

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estate of Woodbridge Group of
Companies, LLC, *et al.*,

Plaintiff,

v.

[SEE ATTACHED **EXHIBIT A**],

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case Nos. (See attached **Exhibit A**)

CERTIFICATION OF COUNSEL REGARDING SCHEDULING ORDER

The undersigned hereby certifies the following:

1. Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, *et al.*, (the “Plaintiff”) filed complaints (the “Complaints”) with the United States Bankruptcy Court for the District of Delaware (the “Court”) against the above-captioned defendants (the “Defendants,” and together with the Plaintiff, the “Parties”).

2. The above-captioned Defendants have filed answers and/or other

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

responsive pleadings to the Complaints and the Plaintiff has circulated to the Defendants a proposed form of scheduling order (the “Scheduling Order”) attached hereto as **Exhibit 1**.

3. The Trust has conferred with the Defendants listed on **Exhibit B** hereto and those Defendants have agreed upon the Scheduling Order.

4. Following the hearing before the Court on August 12, 2020 (the “Hearing”), and as described on the record at the Hearing by counsel to the Trustee, counsel for the Trustee again contacted the Defendants listed on **Exhibit C** who failed to respond to the initial request to review the proposed scheduling order. No response was received to the follow-up communication.

5. The Plaintiff hereby requests entry of the Scheduling Order attached hereto as Exhibit 1 at the Court’s convenience.

Dated: September 2, 2020
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Fax: 302-652-4400

Email: rpachulski@pszjlaw.com

acaine@pszjlaw.com

bsandler@pszjlaw.com

crobinson@pszjlaw.com

Counsel to the Plaintiff

EXHIBIT A

Defendant(s)	Adv. Proc. Case No.
STEFAN KOLOSENKO	19-50301
MARY M. NOYES; GALE E. NOYES	19-50312
DELTON CHRISTMAN; JEAN CHRISTMAN	19-50314
FLOYD G. DAVIS; LAVONNE J. DAVIS	19-50317
TOOMAS HEINMETS; PAMELA HEINMETS	19-50322
DENNIS W. HUETH	19-50331
CHRISTIAN LESTER	19-50332
JOSEPH LIN	19-50334
LAURENCE J. NAKASONE	19-50337
JEFF SCHUSTER	19-50341
ANITA BEDOYA AND MARK BEDOYA	19-50343
ANITA BEDOYA; JULIAN DURAN	19-50344
RONALD COLE	19-50346
NANNETTE TIBBITTS	19-50353
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF DWIGHT L. ATHERTON IRA; DWIGHT L. ATHERTON	19-50581
TERRY B. GRIFFIN, IN HIS CAPACITY AS TRUSTEE OF THE GRIFFIN FAMILY TRUST; TERRY B. GRIFFIN	19-50744
CHRIST TEMPLE BAPTIST CHURCH	19-50756
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF LYNETTE EDDY IRA; LYNETTE EDDY	19-50808
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF EARL EDDY IRA; EARL EDDY	19-50814
RONDA ROGOVIN	19-50852
MGM RESORTS INTERNATIONAL d/b/a Mandalay Bay Resort	19-50853
MARY J. HAPPERSETT, IN HER CAPACITY AS TRUSTEE OF THE MARY J HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; MARY J. HAPPERSETT	19-50870
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF HAROLD L. LUSTIG IRA; HAROLD L. LUSTIG	19-50910
ALL MARK INSURANCE SERVICES, INC.; CAMERON JOHNSON	19-50921
CHRIS DANTIN FINANCIAL SERVICES, LLC; CHRIS A DANTIN SR	19-50922
MATTHEW GILCHRIST	19-50997
DAVID VALENCIA; VALENCIA FINANCIAL SERVICES, LLC	19-51000
BETTE TYDINGS	19-51002

RETIREMENT PLANNING SOLUTIONS, LLC; GORDON HANNAH	19-51004
GAULAN FINANCIAL LLC	19-51012
YANITSHA M FELICIANO	19-51015
LEGACY FINANCIAL NETWORK AND RETIREMENT SERVICES, INC. AND JEFFREY NIMMOW	19-51016
ROBERT BISCARDI, JR.	19-51048
ARASH TASHVIGHI	19-51049
TO THE MAX MARKETING, INC.	19-51066
THOMAS FURMAN	19-50299
ALEXANDER S. ADUNA; EMMA R. ADUNA	19-50307
SYLVAN R. JUTTE; JEANNETTE E. JUTTE	19-50308
BRIAN D. KORKUS; ROBIN L KORKUS	19-50309
DARRELL SANDISON; MATTIE SANDISON	19-50313
GEORGE T. IWAHIRO; CHARLENE M. IWAHIRO	19-50319
RICHARD E. ATTIG; STEPHANIE L. ATTIG	19-50325
JASON CURTIS	19-50327
JANET V. DUES	19-50328
DENA FALKENSTEIN	19-50329
JUDY KAREN GOODIN	19-50330
JANE MARSHALL	19-50335
BLAINE PHILLIPS	19-50338
GEORGE EDWARD SARGENT	19-50340
JENNIFER TOM	19-50342
RONALD DRAPER	19-50347
STEPHEN B. MOORE	19-50350
LAWRENCE J. PAYNTER	19-50351
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF MARIE PODKOWINSKI; MARIE PODKOWINSKI	19-50559
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF LORIE GORMAN; LORIE GORMAN	19-50567
IRA SERVICES TRUST COMPANY - CUSTODIAN FOR THE BENEFIT OF JAMES C. CHANG IRA; JAMES C. CHANG	19-50576
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF JOHN KOBIERECKI; JOHN KOBIERECKI	19-50578
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF LARRY A. NORTON IRA; LARRY A. NORTON	19-50586
PAUL F. HAPPERSETT, IN HIS CAPACITY AS TRUSTEE OF THE PAUL F. HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; PAUL F. HAPPERSETT	19-50735

ANTHONY ARTHUR MEOLA JR., IN HIS CAPACITY AS TRUSTEE OF THE ANTHONY ARTHUR MEOLA JR. 2008 TRUST; ANTHONY ARTHUR MEOLA JR.	19-50741
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF TIMOTHY HAWLEY; TIMOTHY HAWLEY	19-50750
IRMGARD HERRMANN	19-50752
RENE C. MARSOLAN; JUDY MARSOLAN	19-50775
ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF SHARON R. FERRY IRA; SHARON R. FERRY	19-50831
CLAYTON NAKASONE	19-50832
HART PLACEMENT AGENCY INC.	19-50847
ROBERT ELMER	19-50850
PETER GREENBERG	19-50855
KATHY HAGEN, IN HER CAPACITY AS TRUSTEE TO THE KATHY A HAGEN DECLARATION OF TRUST DATED MARCH 2, 1998; KATHY HAGEN	19-50869
FRED RANDHAHN; KAREN RANDHAHN; ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF ANTELOPE WOMEN'S CENTER 401K PSP FOR THE BENEFIT OF KAREN RANDHAHN; KRONOS GLOBAL ADVISORS, INC.	19-50908
MICHAEL KANDRAVI	19-50914
MAXWELL FINANCIAL GROUP, INC; ROSEMARY MALMSTEDT	19-50915
KIM BUTLER	19-50917
JOSEPH RUBIN INC.; JOSEPH RUBIN	19-50918
MARK GOLDFINGER	19-50920
DANNY VAN HOUTEN	19-50927
RETIREMENT SERVICES LLC	19-50931
JEROME SCHWARTZ; ASSOCIATED INSURANCE GROUP INCORPORATED	19-50938
ROGER OWENS; JENNIFER M. LEPORE	19-50940
JOHN FAGAN	19-50947
IVY LEAGUE COLLEGE PLANNING STRATEGIES, INC.; MIKE RAPP	19-50951
JAMES LAMONT	19-50952
GERARD J O'NEILL	19-50964
DAVID KELEDJIAN	19-50973
JOSEPH W. ISAAC	19-50976
RANDY ROBERTSON	19-50977
MATTHEW LORENC	19-50979
DONOVAN KNOWLES	19-50980
GREGORY JANDT	19-50981

JAMES A. KLOHN & ASSOC, P.A.	19-50989
JOHN J MCNAMARA	19-50998
RICKI DEAN WIGGS	19-51003
DENNIS DRAKE; MID-ATLANTIC BROKERS, INC.	19-51006
DAN REISINGER	19-51007
JOHN HARRIS d/b/a HARRIS FINANCIAL MANAGEMENT; JOHN HARRIS	19-51011
SEARCHLIGHT FINANCIAL ADVISORS, LLC; CAROLINE RAKNESS	19-51022
BASIC FINANCIAL SERVICES INC., BASIC WEALTH ADVISORS, INC., FRED C. JOHNSON	19-51039
TWH ANNUITIES & INSURANCE AGENCY, INC.;; GRYPHON FINANCIAL SERVICES	19-51042
SYCAMORE GROUP, INC.; BENDER W. MACKEY	19-51043
MATTE BLACK INC.; MATTHEW J. SCHWARTZ	19-51077
PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF GAIL MARIE BUSH IRA; GAIL MARIE BUSH; GAIL MARIE BUSH AS TRUSTEE OF THE GAIL MARIE BUSH TRUST DATED 12/21/2001	19-51133
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF RICHARD DERF SEP IRA IRA; RICHARD DERF	19-51136
HARRY R. CULOTTA, IN HIS CAPACITY AS TRUSTEE OF THE HARRY R. CULOTTA TRUST DATED 11/16/16, HARRY R. CULOTTA	19-51138
RUSSELL BULLIS; BETSY BULLIS	19-50310
MICHAEL SKURICH; JOYCE SKURICH	19-50315
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF JOHN P. SMITH; JOHN P. SMITH	19-50760
MARCELLA BEST	19-50819
ALTHEA MCCORMICK	19-50823
KIRK W. CHUBKA	19-50826
MARY ELLEN NUHN	19-50829
JOHN J. BEGLEY	19-50830
PHILLIP BALL a/k/a LARRY BALL	19-50913
GREGG W. BUTLER	19-50958
HAROLD PLAIN	19-50974
JOSEPH A. LOOX	19-50978
DANIEL P. ORFIN	19-51005
RICHARD ANTHONY MILLER	19-51008
MICHAEL LITWIN	19-51023
KENNETH HALBERT	19-51027

EXHIBIT B

Defendant(s)	Adv. Proc. Case No.
STEFAN KOLOSENKO	19-50301
MARY M. NOYES; GALE E. NOYES	19-50312
DELTON CHRISTMAN; JEAN CHRISTMAN	19-50314
FLOYD G. DAVIS; LAVONNE J. DAVIS	19-50317
TOOMAS HEINMETS; PAMELA HEINMETS	19-50322
DENNIS W. HUETH	19-50331
CHRISTIAN LESTER	19-50332
JOSEPH LIN	19-50334
LAURENCE J. NAKASONE	19-50337
JEFF SCHUSTER	19-50341
ANITA BEDOYA AND MARK BEDOYA	19-50343
ANITA BEDOYA; JULIAN DURAN	19-50344
RONALD COLE	19-50346
NANNETTE TIBBITTS	19-50353
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF DWIGHT L. ATHERTON IRA; DWIGHT L. ATHERTON	19-50581
TERRY B. GRIFFIN, IN HIS CAPACITY AS TRUSTEE OF THE GRIFFIN FAMILY TRUST; TERRY B. GRIFFIN	19-50744
CHRIST TEMPLE BAPTIST CHURCH	19-50756
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF LYNETTE EDDY IRA; LYNETTE EDDY	19-50808
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF EARL EDDY IRA; EARL EDDY	19-50814
RONDA ROGOVIN	19-50852
MGM RESORTS INTERNATIONAL d/b/a Mandalay Bay Resort	19-50853
MARY J. HAPPERSETT, IN HER CAPACITY AS TRUSTEE OF THE MARY J HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; MARY J. HAPPERSETT	19-50870
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF HAROLD L. LUSTIG IRA; HAROLD L. LUSTIG	19-50910
ALL MARK INSURANCE SERVICES, INC.; CAMERON JOHNSON	19-50921
CHRIS DANTIN FINANCIAL SERVICES, LLC; CHRIS A DANTIN SR	19-50922
MATTHEW GILCHRIST	19-50997
DAVID VALENCIA; VALENCIA FINANCIAL SERVICES, LLC	19-51000
BETTE TYDINGS	19-51002

RETIREMENT PLANNING SOLUTIONS, LLC; GORDON HANNAH	19-51004
GAULAN FINANCIAL LLC	19-51012
YANITSHA M FELICIANO	19-51015
LEGACY FINANCIAL NETWORK AND RETIREMENT SERVICES, INC. AND JEFFREY NIMMOW	19-51016
ROBERT BISCARDI, JR.	19-51048
ARASH TASHVIGHI	19-51049
TO THE MAX MARKETING, INC.	19-51066
THOMAS FURMAN	19-50299
ALEXANDER S. ADUNA; EMMA R. ADUNA	19-50307
SYLVAN R. JUTTE; JEANNETTE E. JUTTE	19-50308
BRIAN D. KORKUS; ROBIN L KORKUS	19-50309
DARRELL SANDISON; MATTIE SANDISON	19-50313
GEORGE T. IWAHIRO; CHARLENE M. IWAHIRO	19-50319
RICHARD E. ATTIG; STEPHANIE L. ATTIG	19-50325
JASON CURTIS	19-50327
JANET V. DUES	19-50328
DENA FALKENSTEIN	19-50329
JUDY KAREN GOODIN	19-50330
JANE MARSHALL	19-50335
BLAINE PHILLIPS	19-50338
GEORGE EDWARD SARGENT	19-50340
JENNIFER TOM	19-50342
RONALD DRAPER	19-50347
STEPHEN B. MOORE	19-50350
LAWRENCE J. PAYNTER	19-50351
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF MARIE PODKOWINSKI; MARIE PODKOWINSKI	19-50559
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF LORIE GORMAN; LORIE GORMAN	19-50567
IRA SERVICES TRUST COMPANY - CUSTODIAN FOR THE BENEFIT OF JAMES C. CHANG IRA; JAMES C. CHANG	19-50576
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF JOHN KOBIERECKI; JOHN KOBIERECKI	19-50578
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF LARRY A. NORTON IRA; LARRY A. NORTON	19-50586
PAUL F. HAPPERSETT, IN HIS CAPACITY AS TRUSTEE OF THE PAUL F. HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; PAUL F. HAPPERSETT	19-50735

ANTHONY ARTHUR MEOLA JR., IN HIS CAPACITY AS TRUSTEE OF THE ANTHONY ARTHUR MEOLA JR. 2008 TRUST; ANTHONY ARTHUR MEOLA JR.	19-50741
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF TIMOTHY HAWLEY; TIMOTHY HAWLEY	19-50750
IRMGARD HERRMANN	19-50752
RENE C. MARSOLAN; JUDY MARSOLAN	19-50775
ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF SHARON R. FERRY IRA; SHARON R. FERRY	19-50831
CLAYTON NAKASONE	19-50832
HART PLACEMENT AGENCY INC.	19-50847
ROBERT ELMER	19-50850
PETER GREENBERG	19-50855
KATHY HAGEN, IN HER CAPACITY AS TRUSTEE TO THE KATHY A HAGEN DECLARATION OF TRUST DATED MARCH 2, 1998; KATHY HAGEN	19-50869
FRED RANDHAHN; KAREN RANDHAHN; ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF ANTELOPE WOMEN'S CENTER 401K PSP FOR THE BENEFIT OF KAREN RANDHAHN; KRONOS GLOBAL ADVISORS, INC.	19-50908
MICHAEL KANDRAVI	19-50914
MAXWELL FINANCIAL GROUP, INC; ROSEMARY MALMSTEDT	19-50915
KIM BUTLER	19-50917
JOSEPH RUBIN INC.; JOSEPH RUBIN	19-50918
MARK GOLDFINGER	19-50920
DANNY VAN HOUTEN	19-50927
RETIREMENT SERVICES LLC	19-50931
JEROME SCHWARTZ; ASSOCIATED INSURANCE GROUP INCORPORATED	19-50938
ROGER OWENS; JENNIFER M. LEPORE	19-50940
JOHN FAGAN	19-50947
IVY LEAGUE COLLEGE PLANNING STRATEGIES, INC.; MIKE RAPPA	19-50951
JAMES LAMONT	19-50952
GERARD J O'NEILL	19-50964
DAVID KELEDJIAN	19-50973
JOSEPH W. ISAAC	19-50976
RANDY ROBERTSON	19-50977
MATTHEW LORENC	19-50979
DONOVAN KNOWLES	19-50980
GREGORY JANDT	19-50981

JAMES A. KLOHN & ASSOC, P.A.	19-50989
JOHN J MCNAMARA	19-50998
RICKI DEAN WIGGS	19-51003
DENNIS DRAKE; MID-ATLANTIC BROKERS, INC.	19-51006
DAN REISINGER	19-51007
JOHN HARRIS d/b/a HARRIS FINANCIAL MANAGEMENT; JOHN HARRIS	19-51011
SEARCHLIGHT FINANCIAL ADVISORS, LLC; CAROLINE RAKNESS	19-51022
BASIC FINANCIAL SERVICES INC., BASIC WEALTH ADVISORS, INC., FRED C. JOHNSON	19-51039
TWH ANNUITIES & INSURANCE AGENCY, INC.;; GRYPHON FINANCIAL SERVICES	19-51042
SYCAMORE GROUP, INC.;; BENDER W. MACKEY	19-51043
MATTE BLACK INC.;; MATTHEW J. SCHWARTZ	19-51077
PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF GAIL MARIE BUSH IRA; GAIL MARIE BUSH; GAIL MARIE BUSH AS TRUSTEE OF THE GAIL MARIE BUSH TRUST DATED 12/21/2001	19-51133
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF RICHARD DERF SEP IRA IRA; RICHARD DERF	19-51136
HARRY R. CULOTTA, IN HIS CAPACITY AS TRUSTEE OF THE HARRY R. CULOTTA TRUST DATED 11/16/16, HARRY R. CULOTTA	19-51138

EXHIBIT C

Defendant(s)	Adv. Proc. Case No.
RUSSELL BULLIS; BETSY BULLIS	19-50310
MICHAEL SKURICH; JOYCE SKURICH	19-50315
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF JOHN P. SMITH; JOHN P. SMITH	19-50760
MARCELLA BEST	19-50819
ALTHEA MCCORMICK	19-50823
KIRK W. CHUBKA	19-50826
MARY ELLEN NUHN	19-50829
JOHN J. BEGLEY	19-50830
PHILLIP BALL a/k/a LARRY BALL	19-50913
GREGG W. BUTLER	19-50958
HAROLD PLAIN	19-50974
JOSEPH A. LOOX	19-50978
DANIEL P. ORFIN	19-51005
RICHARD ANTHONY MILLER	19-51008
MICHAEL LITWIN	19-51023
KENNETH HALBERT	19-51027

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>WOODBRIIDGE GROUP OF COMPANIES, LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Remaining Debtors.</p>	<p>Chapter 11</p> <p>Case No. 17-12560 (BLS)</p> <p>(Jointly Administered)</p>
<p>MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>(SEE <u>EXHIBIT 1</u> ATTACHED HERETO),</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Proc. Case Nos. (SEE <u>EXHIBIT 1</u>)</p>

SCHEDULING ORDER

To promote the efficient and expeditious disposition of adversary proceedings, the following schedule shall apply to each of the above-captioned adversary proceedings.

IT IS HEREBY ORDERED that:

1. The discovery planning conference described in Fed.R.Civ.P. 26(f), made applicable by Fed.R.Bankr.P. 7026, shall be deemed to have taken place, provided, however, that the parties each reserve their rights regarding issues concerning electronic discovery.

2. The above-captioned adversary proceedings are assigned to mediation pursuant to Local Rule 9019-5.

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

3. No later than thirty (30) days after this Scheduling Order is entered, the Defendant shall provide the Plaintiff with a list of three (3) proposed mediators.

4. No later than forty-five (45) days after this Scheduling Order is entered, the parties shall file a Stipulation Regarding Appointment of a Mediator setting forth the mediator selected by the parties and the date the mediation has been set to commence. If the Parties cannot agree on a mediator, the Plaintiff shall file a statement alerting the Court of such inability and a request that the Court select and appoint a mediator to the proceeding.

5. All formal discovery between the parties, including, but not limited to the service of initial disclosures under Fed.R.Civ.P. 26(a)(1), shall be tolled until after the filing of the Mediator's Certificate of Completion pursuant to Local Rule 9019-5(f)(ii). The form of stipulation tolling discovery attached hereto as **Exhibit A** is hereby approved.

6. The parties shall provide the initial disclosures under Fed.R.Civ.P. 26(a)(1) no later than thirty (30) days after the filing of the Certificate of Completion. Any extension of the deadline to provide initial disclosures may be made by agreement of the parties or by Order of the Court for good cause shown.

7. All fact discovery shall be completed no later than one hundred twenty (120) days after the filing of the Certificate of Completion.

8. Any expert report required pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) shall be served by the party which bears the burden of proof for that issue, not including any report by Plaintiff on insolvency of the Debtors, no later than one hundred sixty-five (165) days after the filing of the Certificate of Completion. If the Defendant intends to

provide expert testimony regarding the insolvency of the Debtors, notice of the Defendant's intent to submit any such expert report must be provided no later than one hundred fifty (150) days after the filing of the Certificate of Completion, and any such expert report must be provided no later than one hundred eighty (180) days after the filing of the Certificate of Completion. Any expert rebuttal report by Plaintiff on the insolvency of the Debtors, shall be provided no later than two hundred ten (210) days after the filing of the Certificate of Completion. Any Party's expert report intended to rebut any other expert report, including any other expert reports that may be filed earlier than the deadlines established in this subparagraph, shall be provided no later than thirty (30) days after the report being rebutted, provided, however, that in no event shall the thirty (30) day period start prior to one hundred twenty (120) days after the filing of the Certificate of Completion. All reports shall provide the information required by Fed.R.Civ.P. 26(a)(2)(B). All expert discovery shall be completed no later than two hundred seventy (270) days after the filing of the Certificate of Completion.

9. If either party does not agree to toll discovery until after the conclusion of mediation in accordance with paragraph 5 of this Order, it must notify the other party in writing within five (5) days of the entry of this Scheduling Order, and, in such instances, the following subparagraphs (a) through (d) shall apply:

- (a) The discovery planning conference described in Fed.R.Civ.P. 26(f), made applicable by Fed.R.Bankr.P. 7026, shall be deemed to have taken place, provided, however, that the parties each reserve their rights regarding issues concerning electronic discovery.

- (b) The parties shall provide the initial disclosures under Fed.R.Civ.P. 26(a)(1) no later than thirty (30) days after the date this Scheduling Order is entered. Any extension of the deadline to provide initial disclosures may be made by agreement of the parties or by Order of the Court for good cause shown.
- (c) All fact discovery ("Fact Discovery") shall be completed no later than one hundred twenty (120) days after the date this Scheduling Order is entered.
- (d) Any expert report required pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) shall be served by the Party which bears the burden of proof for that issue, not including any report by Plaintiff on insolvency of the Debtor, no later than one hundred sixty-five (165) days after the date this Scheduling Order is entered. If the Defendant intends to provide expert testimony regarding the insolvency of the Debtors, notice of the Defendant's intent to submit any such expert report must be provided no later than one hundred fifty (150) days after the date this Scheduling Order is entered, and any such expert report must be provided no later than one hundred eighty (180) days after the date this Scheduling Order is entered. Any expert rebuttal report by Plaintiff on the insolvency of the Debtors shall be provided no later than two hundred ten (210) days after the date this Scheduling Order is entered. Any Party's expert report intended to rebut any other expert report, including any other expert reports that may

be filed earlier than the deadlines established in this subparagraph, shall be provided no later than thirty (30) days after the report being rebutted, provided, however, that in no event shall the thirty (30) day period start prior to one hundred twenty (120) days after the date this Scheduling Order is entered. All reports shall provide the information required by Fed.R.Civ.P. 26(a)(2)(B). All expert discovery shall be completed, and discovery shall close, no later than two hundred seventy (270) days after the date this Scheduling Order is entered.

10. All motions pursuant to Rule 5011-1 of the Local Rules, including a motion for withdrawal of the reference or motion for a determination of whether the Court has authority to enter final orders and judgments, shall be filed and served not sooner than thirty (30) days after the close of all discovery and not later than 60 days prior to trial, and shall be subject to the Local Rules.

11. All dispositive motions shall be filed and served by not later than thirty (30) days after the close of all discovery and shall be subject to Rule 7007-1 of the Local Rules.

12. The parties shall file, no later than three (3) business days prior to the date set for Trial, their Joint Pretrial Memorandum approved by all counsel and shall contemporaneously deliver two (2) copies thereof to Judge Shannon's chambers.

13. As soon as is feasible after the close of all discovery, the Plaintiff shall contact the Court to schedule a final pretrial conference in accordance with Local Rule 7016-2(a).

14. The Plaintiff shall immediately notify Chambers upon the settlement, dismissal or other resolution of any adversary proceeding subject to this Order and shall file with the Court appropriate evidence of such resolution as soon thereafter as is feasible. The Plaintiff shall file a status report sixty (60) days after the date of this Scheduling Order, each sixty (60) days thereafter, and thirty (30), twenty (20), and ten (10) days prior to trial, setting out the status of each unresolved adversary proceeding subject to this Order. Plaintiff shall immediately advise Chambers, in writing, of any occurrence or circumstance which Plaintiff believes may suggest or necessitate the adjournment or other modification of the trial setting.

15. Deadlines contained in this Scheduling Order may be extended by written agreement of the parties or upon written motion or stipulation for cause shown.

16. The Plaintiff shall serve this Scheduling Order on each of the Defendant's in the above-captioned adversary proceedings within five (5) business days after the entry of this Order.

EXHIBIT A TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBRIIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estate of Woodbridge Group of
Companies, LLC, *et al.*,

Plaintiff,

v.

[DEFENDANT NAME],

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc No. 19- _____ (BLS)

**STIPULATION TO TOLL
DISCOVERY UNTIL AFTER THE CONCLUSION OF MEDIATION**

Plaintiff Michael Goldberg, (the “Plaintiff”), as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, *et al.*, and the above-captioned defendant (the “Defendant” and together with the Plaintiff, the “Parties”), hereby agree and stipulate that, in according with the scheduling order dated _____, 2020, discovery shall be tolled until after the filing of a mediator’s Certificate of Completion pursuant to Local Rule 9019-5(f)(ii).

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Dated: _____, 2020

[FIRM]

PACHULSKI STANG ZIEHL & JONES LLP

By: _____

[Attorney]

[Address]

[City, State, Zip]

Tel: _____

Fax: _____

Email: _____

Counsel for Defendant

By: _____

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Fax: 302-652-4400

Email: rpachulski@pszjlaw.com

acaine@pszjlaw.com

bsandler@pszjlaw.com

crobinson@pszjlaw.com

Counsel for Plaintiff

EXHIBIT 1

Defendant(s)	Adv. Proc. Case No.
STEFAN KOLOSENKO	19-50301
MARY M. NOYES; GALE E. NOYES	19-50312
DELTON CHRISTMAN; JEAN CHRISTMAN	19-50314
FLOYD G. DAVIS; LAVONNE J. DAVIS	19-50317
TOOMAS HEINMETS; PAMELA HEINMETS	19-50322
DENNIS W. HUETH	19-50331
CHRISTIAN LESTER	19-50332
JOSEPH LIN	19-50334
LAURENCE J. NAKASONE	19-50337
JEFF SCHUSTER	19-50341
ANITA BEDOYA AND MARK BEDOYA	19-50343
ANITA BEDOYA; JULIAN DURAN	19-50344
RONALD COLE	19-50346
NANNETTE TIBBITTS	19-50353
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF DWIGHT L. ATHERTON IRA; DWIGHT L. ATHERTON	19-50581
TERRY B. GRIFFIN, IN HIS CAPACITY AS TRUSTEE OF THE GRIFFIN FAMILY TRUST; TERRY B. GRIFFIN	19-50744
CHRIST TEMPLE BAPTIST CHURCH	19-50756
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF LYNETTE EDDY IRA; LYNETTE EDDY	19-50808
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF EARL EDDY IRA; EARL EDDY	19-50814
RONDA ROGOVIN	19-50852
MGM RESORTS INTERNATIONAL d/b/a Mandalay Bay Resort	19-50853
MARY J. HAPPERSETT, IN HER CAPACITY AS TRUSTEE OF THE MARY J HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; MARY J. HAPPERSETT	19-50870
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF HAROLD L. LUSTIG IRA; HAROLD L. LUSTIG	19-50910
ALL MARK INSURANCE SERVICES, INC.; CAMERON JOHNSON	19-50921
CHRIS DANTIN FINANCIAL SERVICES, LLC; CHRIS A DANTIN SR	19-50922
MATTHEW GILCHRIST	19-50997
DAVID VALENCIA; VALENCIA FINANCIAL SERVICES, LLC	19-51000
BETTE TYDINGS	19-51002

RETIREMENT PLANNING SOLUTIONS, LLC; GORDON HANNAH	19-51004
GAULAN FINANCIAL LLC	19-51012
YANITSHA M FELICIANO	19-51015
LEGACY FINANCIAL NETWORK AND RETIREMENT SERVICES, INC. AND JEFFREY NIMMOW	19-51016
ROBERT BISCARDI, JR.	19-51048
ARASH TASHVIGHI	19-51049
TO THE MAX MARKETING, INC.	19-51066
THOMAS FURMAN	19-50299
ALEXANDER S. ADUNA; EMMA R. ADUNA	19-50307
SYLVAN R. JUTTE; JEANNETTE E. JUTTE	19-50308
BRIAN D. KORKUS; ROBIN L KORKUS	19-50309
DARRELL SANDISON; MATTIE SANDISON	19-50313
GEORGE T. IWAHIRO; CHARLENE M. IWAHIRO	19-50319
RICHARD E. ATTIG; STEPHANIE L. ATTIG	19-50325
JASON CURTIS	19-50327
JANET V. DUES	19-50328
DENA FALKENSTEIN	19-50329
JUDY KAREN GOODIN	19-50330
JANE MARSHALL	19-50335
BLAINE PHILLIPS	19-50338
GEORGE EDWARD SARGENT	19-50340
JENNIFER TOM	19-50342
RONALD DRAPER	19-50347
STEPHEN B. MOORE	19-50350
LAWRENCE J. PAYNTER	19-50351
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF MARIE PODKOWINSKI; MARIE PODKOWINSKI	19-50559
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF LORIE GORMAN; LORIE GORMAN	19-50567
IRA SERVICES TRUST COMPANY - CUSTODIAN FOR THE BENEFIT OF JAMES C. CHANG IRA; JAMES C. CHANG	19-50576
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF JOHN KOBIERECKI; JOHN KOBIERECKI	19-50578
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF LARRY A. NORTON IRA; LARRY A. NORTON	19-50586
PAUL F. HAPPERSETT, IN HIS CAPACITY AS TRUSTEE OF THE PAUL F. HAPPERSETT REVOCABLE LIVING TRUST AGREEMENT DATED 07/15/98; PAUL F. HAPPERSETT	19-50735

ANTHONY ARTHUR MEOLA JR., IN HIS CAPACITY AS TRUSTEE OF THE ANTHONY ARTHUR MEOLA JR. 2008 TRUST; ANTHONY ARTHUR MEOLA JR.	19-50741
MAINSTAR TRUST, CUSTODIAN FOR THE BENEFIT OF TIMOTHY HAWLEY; TIMOTHY HAWLEY	19-50750
IRMGARD HERRMANN	19-50752
RENE C. MARSOLAN; JUDY MARSOLAN	19-50775
ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF SHARON R. FERRY IRA; SHARON R. FERRY	19-50831
CLAYTON NAKASONE	19-50832
HART PLACEMENT AGENCY INC.	19-50847
ROBERT ELMER	19-50850
PETER GREENBERG	19-50855
KATHY HAGEN, IN HER CAPACITY AS TRUSTEE TO THE KATHY A HAGEN DECLARATION OF TRUST DATED MARCH 2, 1998; KATHY HAGEN	19-50869
FRED RANDHAHN; KAREN RANDHAHN; ASCENSUS, LLC D/B/A PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF ANTELOPE WOMEN'S CENTER 401K PSP FOR THE BENEFIT OF KAREN RANDHAHN; KRONOS GLOBAL ADVISORS, INC.	19-50908
MICHAEL KANDRAVI	19-50914
MAXWELL FINANCIAL GROUP, INC; ROSEMARY MALMSTEDT	19-50915
KIM BUTLER	19-50917
JOSEPH RUBIN INC.; JOSEPH RUBIN	19-50918
MARK GOLDFINGER	19-50920
DANNY VAN HOUTEN	19-50927
RETIREMENT SERVICES LLC	19-50931
JEROME SCHWARTZ; ASSOCIATED INSURANCE GROUP INCORPORATED	19-50938
ROGER OWENS; JENNIFER M. LEPORE	19-50940
JOHN FAGAN	19-50947
IVY LEAGUE COLLEGE PLANNING STRATEGIES, INC.; MIKE RAPP	19-50951
JAMES LAMONT	19-50952
GERARD J O'NEILL	19-50964
DAVID KELEDJIAN	19-50973
JOSEPH W. ISAAC	19-50976
RANDY ROBERTSON	19-50977
MATTHEW LORENC	19-50979
DONOVAN KNOWLES	19-50980
GREGORY JANDT	19-50981

JAMES A. KLOHN & ASSOC, P.A.	19-50989
JOHN J MCNAMARA	19-50998
RICKI DEAN WIGGS	19-51003
DENNIS DRAKE; MID-ATLANTIC BROKERS, INC.	19-51006
DAN REISINGER	19-51007
JOHN HARRIS d/b/a HARRIS FINANCIAL MANAGEMENT; JOHN HARRIS	19-51011
SEARCHLIGHT FINANCIAL ADVISORS, LLC; CAROLINE RAKNESS	19-51022
BASIC FINANCIAL SERVICES INC., BASIC WEALTH ADVISORS, INC., FRED C. JOHNSON	19-51039
TWH ANNUITIES & INSURANCE AGENCY, INC.;; GRYPHON FINANCIAL SERVICES	19-51042
SYCAMORE GROUP, INC.; BENDER W. MACKEY	19-51043
MATTE BLACK INC.; MATTHEW J. SCHWARTZ	19-51077
PROVIDENT TRUST GROUP, CUSTODIAN FOR THE BENEFIT OF GAIL MARIE BUSH IRA; GAIL MARIE BUSH; GAIL MARIE BUSH AS TRUSTEE OF THE GAIL MARIE BUSH TRUST DATED 12/21/2001	19-51133
IRA SERVICES TRUST COMPANY, CUSTODIAN FOR THE BENEFIT OF RICHARD DERF SEP IRA IRA; RICHARD DERF	19-51136
HARRY R. CULOTTA, IN HIS CAPACITY AS TRUSTEE OF THE HARRY R. CULOTTA TRUST DATED 11/16/16, HARRY R. CULOTTA	19-51138
RUSSELL BULLIS; BETSY BULLIS	19-50310
MICHAEL SKURICH; JOYCE SKURICH	19-50315
PROVIDENT TRUST GROUP, LLC, CUSTODIAN FOR THE BENEFIT OF JOHN P. SMITH; JOHN P. SMITH	19-50760
MARCELLA BEST	19-50819
ALTHEA MCCORMICK	19-50823
KIRK W. CHUBKA	19-50826
MARY ELLEN NUHN	19-50829
JOHN J. BEGLEY	19-50830
PHILLIP BALL a/k/a LARRY BALL	19-50913
GREGG W. BUTLER	19-50958
HAROLD PLAIN	19-50974
JOSEPH A. LOOX	19-50978
DANIEL P. ORFIN	19-51005
RICHARD ANTHONY MILLER	19-51008
MICHAEL LITWIN	19-51023
KENNETH HALBERT	19-51027