

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

MICHAEL GOLDBERG, in his capacity as  
Liquidating Trustee of the WOODBRIDGE  
LIQUIDATION TRUST,

Plaintiff,

vs.

JAMES A. KLOHN & ASSOC., P.A.,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case No. 19-50989 (BLS)

**STIPULATION REGARDING APPOINTMENT OF MEDIATOR**

Pursuant to this Court's September 3, 2020, scheduling order (the "Scheduling Order"), plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust, and defendant James A. Klohn & Assoc., P.A., stipulate as follows:

1. Ian Connor Bifferato, Esquire, of The Bifferato Firm, P.A. shall be appointed as the mediator (the "Mediator") in this adversary proceeding.
2. The mediation between the parties shall proceed in accordance with the Scheduling Order and the deadlines set forth therein and shall be conducted in accordance with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for

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<sup>1</sup> 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 District of Delaware and/or otherwise as may be agreed by the parties and the Mediator. The parties will select a date for commencement of the mediation.

STIPULATED AND AGREED:

Dated: November 5, 2020

PACHULSKI STANG ZIEHL & JONES LLP

LAW OFFICES OF JOYCE, LLC

/s/ Colin R. Robinson

/s/ Michael J. Joyce

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