

**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, 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 REQUEST FOR  
APPOINTMENT OF MEDIATOR**

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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 defendants listed on Exhibit A hereto (the “Defendants,” and together with the Plaintiff, the “Parties”).

2. The Defendants in the adversary proceedings listed on Exhibit A (the “Adversary Proceedings”) filed answers and/or other responsive pleadings to the Complaints and a proposed form of scheduling order (the “Scheduling Order”) was entered by the Court.

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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 Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

3. Pursuant to the Scheduling Order, the Adversary Proceedings were assigned to mediation and the Defendants were to provide Plaintiff with a list of three (3) proposed mediators. *Scheduling Order*, ¶3. If the Parties cannot agree on a mediator, the Plaintiff shall file a statement alerting the Court of such inability and request that the Court select and appoint a mediator for the Adversary Proceedings. *Id.* at ¶4.

4. The Defendants failed to respond to multiple requests for a list of proposed mediators.

5. Accordingly, the Plaintiff requests that the Court select and appoint a mediator for each of the Adversary Proceedings from the following list of mediators that agreed to serve if appointed by the Court: (i) Judith Fitzgerald; (ii) Leslie Berkoff; (iii) Lucian Murley; and (iv) Derek Abbott.

6. The Plaintiff hereby requests selection of a mediator for each of the Adversary Proceedings at the Court's convenience.

Dated: December 5, 2020  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Colin R. Robinson*

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**EXHIBIT A**

<b>Defendant(s)</b>	<b>Adv. Proc. Case No.</b>
Stefan Kolosenko	19-50301
Eric Little	19-50944
Frontier Advisors Group LLC, David Nichols	19-50945
Legacy Financial Network and Retirement Services, Inc. and Jeffrey Nimmow	19-51016
Robert Biscardi Jr.	19-51048
Arash Tashvighi	19-51049
Structured Strategies, LLC, Alan K. Hoffman	19-51067