

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

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

**Ref. Docket No. 2903**

**NOTICE OF STIPULATION**

**PLEASE TAKE NOTICE** that attached hereto as Exhibit A is a copy of the *Stipulation Regarding Contributed Claims Election of Beverley Lasher* (the “Stipulation”) entered into by the above-captioned debtors and debtors in possession (the “Debtors”) and Ms. Lasher. Pursuant to the Stipulation, upon the Effective Date<sup>2</sup> of the Plan and the formation of the Liquidation Trust, Ms. Lasher will be deemed, without further action, to have contributed her Contributed Claims to the Liquidation Trust and shall be deemed a Contributing Claimant.

**PLEASE TAKE FURTHER NOTICE** that, prior to filing this Notice of Stipulation, the Debtors conferred with the Unsecured Creditors’ Committee, the Noteholder Committee, and the Unitholder Committee, each of which confirmed it did not object to the Debtors’ entry into the Stipulation.

<sup>1</sup> The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of this information may be obtained on the website of the Debtors’ noticing and claims agent at [www.gardencitygroup.com/cases/WGC](http://www.gardencitygroup.com/cases/WGC), or by contacting the undersigned counsel for the Debtors.

<sup>2</sup> Capitalized terms used herein, but not otherwise defined, have the meanings given to them in the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and Its Affiliated Debtors* [Docket No. 2903, Ex. A] (the “Plan”).

Dated: November 27, 2018  
Wilmington, Delaware

/s/ Betsy L. Feldman  
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-and-

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**EXHIBIT A**

**Stipulation**

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

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

**STIPULATION REGARDING CONTRIBUTED CLAIMS ELECTION  
OF CLAIMANT BEVERLY LASHER**

This Stipulation is entered into by and between, on the one hand, Beverly Lasher (“Lasher”) and, on the other hand, Woodbridge Group of Companies, LLC *et al.* (the “Debtors,” and with Lasher, the “Parties” and each a “Party”).

A. **WHEREAS**, on December 4, 2017, the Debtors commenced voluntary cases under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”);

B. **WHEREAS**, on August 22, 2018, the Debtors filed the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [Docket No. 2397] (as it may be amended, supplemented, or modified from time to time pursuant to the terms thereof, the “Plan”),<sup>2</sup> and the *Disclosure Statement for the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [Docket No. 2398] (as it may be amended, supplemented, or modified from time to

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<sup>1</sup> The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ noticing and claims agent at [www.gardencitygroup.com/cases/WGC](http://www.gardencitygroup.com/cases/WGC), or by contacting the undersigned counsel for the Debtors.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Plan.

time, the “Disclosure Statement”);

C. **WHEREAS**, on August 22, 2018, the Bankruptcy Court entered an order approving the Disclosure Statement and authorizing the Debtors to solicit votes to accept the Plan [Docket No. 2396];

D. **WHEREAS**, the Plan provides, *inter alia*, that each Holder of a Class 3 Standard Note Claim may agree, by electing on its Ballot, to contribute its Contributed Claims to the Liquidation Trust;

E. **WHEREAS**, Mainstar Trust FBO Beverly Lasher holds a Class 3 Standard Note Claim (the “Claim”);

F. **WHEREAS**, Lasher asserts that she intended to make the Contributed Claims election on her Ballot #4903 but inadvertently failed to check the applicable box on such Ballot;

G. **WHEREAS**, Lasher represents and warrants that she (i) is the Holder of the Claim or an authorized signatory for such Holder, (ii) has full power and authority to determine whether to make the Contributed Claims election with respect to the Claim, and (iii) has full power and authority to enter into this Stipulation and that by the Parties’ signatures below, it will become a binding agreement; and

H. **WHEREAS**, Lasher represents and warrants that her Contributed Claims are free and clear of any pledge, lien, security interest, charge, claim, equity, option, proxy, voting restriction, right of first refusal, or other limitation on disposition or encumbrance of any kind that would adversely affect in any way Lasher’s ability to contribute such Contributed Claims to the Liquidation Trust.

**NOW THEREFORE**, the Parties agree as follows:

1. Recitals A through H, inclusive, are true and correct and are an integral part of this Stipulation.

2. Lasher shall be deemed to have elected to contribute her Contributed Claims to the Liquidation Trust as if Lasher had made such election on her Class 3 Ballot.

3. Lasher shall be deemed a Contributing Claimant under the Plan and shall receive the treatment set forth in the Plan (including, without limitation, under Section 3.4 of the Plan) for Holders of Class 3 Standard Note Claims who are Contributing Claimants.

4. The Bankruptcy Court shall have exclusive jurisdiction and power to resolve any dispute arising out of, relating to, or deriving from this Stipulation and has the jurisdiction and power to enter a final order thereon.

*[Remainder of page intentionally left blank]*

Dated: 11-28, 2018

WOODBIDGE GROUP OF COMPANIES,  
LLC, ET AL.

By:  \_\_\_\_\_

Name: Bradley D. Sharp

Title: Chief Restructuring Officer

BEVERLY LASHER

\_\_\_\_\_

Dated: Nov 20, 2018

WOODBIDGE GROUP OF COMPANIES,  
LLC, ET AL.

By: \_\_\_\_\_

Name: Bradley D. Sharp

Title: Chief Restructuring Officer

BEVERLY LASHER

Beverly Lasher