

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

In re: Woodbridge Group of Companies LLC <i>et al.</i> , Debtors.	Chapter 11 Bankruptcy No. 17-12560 (KJC) (Jointly Administered)
---------------------------------------------------------------------------------	-------------------------------------------------------------------------------

**NOTICE OF APPEARANCE OF COUNSEL AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Jeffrey W. Shields, Blake D. Miller, and Paul R. Smith of Jones, Waldo, Holbrook & McDonough, PC, and Mark Desgrosseilliers and Ericka Johnson of Womble Bond Dickinson (US) LLP, hereby enter their appearances in the above-captioned cases as counsel to the Utah Noteholder Group (the constituents of which are listed in **Exhibit A**),¹ as holders of promissory notes of Woodbridge Mortgage Investment Fund entities and affiliates, and requests that all pleadings, notices, and other documents, be sent to:

Jeffrey W. Shields Blake D. Miller Paul R. Smith JONES WALDO HOLBROOK & McDONOUGH PC 170 South Main Street, Suite 1500 Salt Lake City, UT 84101 (801) 521-3200 jshields@joneswaldo.com bmiller@joneswaldo.com psmith@joneswaldo.com	Mark Desgrosseilliers Ericka Johnson WOMBLE BOND DICKINSON (US) LLP 222 Delaware Avenue, Suite 1501 Wilmington, DE 19801 (302) 252-4320 Mark.Desgrosseilliers@wbd-us.com Ericka.Johnson@wbd-us.com
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand,

¹ Undersigned counsel anticipate that more individuals will be added to the Collective Noteholder Group over the next few months. Counsel will supplement this Notice of Appearance as those individuals join the group.
1436979.1

memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that is filed or given in connection with this case and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, or claim waives (i) any right to have any matter or proceeding for which a bankruptcy court lacks the authority to enter final order or judgment without the consent of the parties adjudicated by an Article III court, (ii) any right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) any right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) an election of remedies, or (v) any other substantive or procedural right.

PLEASE TAKE FURTHER NOTICE that this notice is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreements, in law, inequity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against debtors or any other entity either in these cases or in any other actions are expressly reserved.

DATED this 18th day of January, 2018.

WOMBLE BOND DICKINSON (US) LLP

/s/ Mark L. Desgrosseilliers

Mark L. Desgrosseilliers (Del. Bar No. 4083)
Ericka F. Johnson (Del. Bar No. 5024)
222 Delaware Avenue, Suite 1501
Wilmington, DE 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
E-mail: mark.desgrosseilliers@wbd-us.com
E-mail: ericka.johnson@wbd-us.com

and

Jeffrey W. Shields (*pro hac vice* pending)

Blake D. Miller (*pro hac vice* pending)

Paul R. Smith (*pro hac vice* pending)

JONES WALDO HOLBROOK & McDONOUGH PC

170 South Main Street, Suite 1500

Salt Lake City, UT 84101

(801) 521-3200

jshields@joneswaldo.com

bmiller@joneswaldo.com

psmith@joneswaldo.com

Attorneys for Utah Noteholder Group

EXHIBIT A

- Jerry Nunley
- Vickie Jorgenson
- Mike Huwe
- George Shengchuan Hsu
- Manuella Bakker
- Michael H. Spackman
- Jeff Doermann
- Chris Brinkerhoff
- Kent Booth
- Robert Murdock
- Jeff Wolk
- Jeff and Lillian Leong
- Kent and Mary Sue Rominger
- Maung Tin-Wa and Anna Spielvogel
- Don Aslett
- Cheryl and David Hermansen
- David Coltrin
- Riley Astill
- Mark Zigerelli
- Karen Conmy
- Raleigh Davis
- Brady Teuscher
- Gwena and Stan Morrill
- Dan Binkerd
- Madeline Clark
- Anthony Barrack
- Patrick Haslam
- Mike Molacek
- Lenoard and Donna Sherman
- Renee Norton
- Clyde Done
- Doyle and Marcia Rumsey
- Yen-Hsu Chen
- Larry Jacobson
- Karl Nelson
- Nasim Barrack
- Golden Berrett
- Ann Halliday
- Richard Doss