

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

In re:

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF APPEARANCE AS COUNSEL AND REQUEST FOR
REMOVAL FROM ELECTRONIC AND PAPER NOTICING MATRIX**

PLEASE TAKE NOTICE that, on December 4, 2017, February 9, 2018, March 9, 2018, March 23, 2018, and March 27 2018, Woodbridge Group of Companies, LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”) each commenced voluntary cases under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”).

PLEASE TAKE FURTHER NOTICE that, on January 23, 2018, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [D.I. 359] authorizing the retention and employment of Young Conaway Stargatt & Taylor, LLP (“Young Conaway”) as co-counsel for the Debtors.

PLEASE TAKE FURTHER NOTICE that, on October 26, 2018, the Court entered an order [D.I. 2903] confirming the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [D.I. 2397] (the “Plan”). The effective date of the Plan occurred on February 15, 2019 (the “Effective Date”) [D.I. 3421].

PLEASE TAKE FURTHER NOTICE that, upon the Effective Date, the Debtors were substantively consolidated into two entities, Woodbridge Group of Companies, LLC and

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 Blvd #302, Sherman Oaks, California 91423.

Woodbridge Mortgage Investment Fund 1, LLC (the “Remaining Debtors”). Plan § 5.8. Also, upon the Effective Date, all of the Debtors other than the Remaining Debtors (the “Unconsolidated Debtors”) were automatically dissolved. Plan § 5.2.3. Further, upon the Effective Date, the Chapter 11 Cases of the Unconsolidated Debtors were closed. Plan § 11.22 and Docket No. 3440. Upon the Effective Date, the Plan also established the Woodbridge Liquidation Trust (the “Trust”) to, among other things, pursue or liquidate the Liquidation Trust Assets (as defined in the Plan). Plan § 5.4.2. The Liquidation Trust Assets included, among other things, any and all Avoidance Actions and Causes of Action (each as defined in the Plan), which were transferred to the Trust upon the Effective Date. Plan §§ 5.4.3, 5.6.1. Finally, also upon the Effective Date, the Plan established the Wind-Down Entity (Plan § 5.3.2) and transferred all of the assets of the Debtors, other than those assets vested in the Trust, to the Wind-Down Entity. Plan § 5.3.3.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Plan and in light of the creation of the Trust and the Wind-Down Entity and the transfer of all of the assets of the Debtors’ estates to the Trust and the Wind-Down Entity, Young Conaway has no controversy pending before the Court. In addition, the Remaining Debtors have consented to Young Conaway’s withdrawal as counsel. Accordingly, pursuant to Rule 9010-2(b)(ii) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Young Conaway hereby withdraws its appearance as counsel for the Debtors in the Chapter 11 Cases. The undersigned further requests that the Clerk of the Court, or any claims or noticing agent appointed in these cases, remove Young Conaway from the electronic and paper noticing matrix for the Chapter 11 Cases.

Dated: July 26, 2019
Wilmington, Delaware

/s/ Ian J. Bambrick

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Sean M. Beach (No. 4070)

Edmon L. Morton (No. 3856)

Ian J. Bambrick (No. 5455)

Betsy L. Feldman (No. 6410)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Tel: (302) 571-6600

Fax: (302) 571-1253