

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

In re:

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Ref. Docket No. 3839

**CERTIFICATE OF NO OBJECTION REGARDING LIQUIDATION TRUST'S
SEVENTH MOTION FOR ENTRY OF AN ORDER, PURSUANT TO BANKRUPTCY
RULES 9006 AND 9027, FURTHER EXTENDING THE PERIOD WITHIN WHICH THE
LIQUIDATION TRUST AND ITS SUBSIDIARIES MAY REMOVE ACTIONS
PURSUANT TO 28 U.S.C. § 1452**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the *Liquidation Trust's Seventh Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Further Extending the Period Within Which the Liquidation Trust and its Subsidiaries May Remove Actions Pursuant to 28 U.S.C. § 1452* [Docket No. 3839] (the "Motion"), filed on September 5, 2019 with the U.S. Bankruptcy Court for the District of Delaware (the "Court").

The undersigned further certifies that a review of the Court's docket in these cases reflects no answer, objection, or other responsive pleading to the Motion that was filed. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than September 19, 2019, at 4:00 p.m. (ET).

It is hereby respectfully requested that the proposed form of order, attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

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 Boulevard #302, Sherman Oaks, California 91423.

Dated: September 23, 2019
Wilmington, Delaware

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EXHIBIT A

**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

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**SEVENTH ORDER, PURSUANT TO BANKRUPTCY RULES
9006 AND 9027, FURTHER EXTENDING THE PERIOD WITHIN WHICH THE
LIQUIDATION TRUST AND ITS SUBSIDIARIES MAY REMOVE ACTIONS
PURSUANT TO 28 U.S.C. § 1452**

Upon consideration of the motion (the “Motion”)² of the Liquidation Trust for the entry of an order, pursuant to Bankruptcy Rules 9006 and 9027, further extending the period within which the Liquidation Trust may remove actions pursuant to 28 U.S.C. § 1452 through and including March 19, 2020 and all pleadings related thereto; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required; and it appearing that the Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found and determined that the relief requested in the Motion is in the best interest of the

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Debtors, their estates, their creditors, and all parties in interest; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The time period provided by Bankruptcy Rule 9027 within which the Liquidation Trust and each of its direct and indirect subsidiaries, including, but not limited to, the Wind-Down Entity and the Remaining Debtors, may file notices of removal of claims and causes of action is further enlarged and extended through and including March 19, 2020 (the “Removal Deadline”).
3. This Order shall be without prejudice to the rights of the Liquidation Trust and each of its direct and indirect subsidiaries, including, but not limited to, the Wind-Down Entity and the Remaining Debtors to seek further extensions of the Removal Deadline.
4. This Court shall retain jurisdiction and power to hear and determine all matters arising from or related to the implementation of this Order.