

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

In re: ) Chapter 11  
 )  
WOODBIDGE GROUP OF COMPANIES, LLC, ) Case No. 17-12560 (KJC)  
 )  
*et al.*,<sup>1</sup> )  
 ) (Jointly Administered)  
Remaining Debtors. )

**NOTICE OF STIPULATION REGARDING RESOLUTION  
OF DISPUTED NOTE CLAIMS**

**PLEASE TAKE NOTICE** that Raymond Sykes (the “Claimant”), a beneficial holder of a Class 3 Standard Note Claim under 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”) disputed the calculation of the amount of his claim.

**PLEASE TAKE FURTHER NOTICE** that the Woodbridge Liquidation Trust and the Claimant conferred and resolved the dispute and have determined the appropriate amount of the Claimants’ Class 3 claim, and the Claimant has elected not to become a Disputing Claimant under the Plan with respect to such claim.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is a copy of the stipulation (the “Stipulation”) entered into by the Woodbridge Liquidation Trust and the respective Claimant to reflect the foregoing.

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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.

Dated: October 7, 2019  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Colin R. Robinson*

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**EXHIBIT A**

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 CLAIM  
OF CLAIMANT RAYMOND SYKES

This Stipulation is entered into by and between, on the one hand, Raymond Sykes (the “Claimant”) and, on the other hand, the Woodbridge Liquidation Trust (the “Liquidation Trust,” and with the Claimant, the “Parties” and each a “Party”).

A. **WHEREAS**, on December 4, 2017, Woodbridge Group of Companies, LLC *et al.* (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*

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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).

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

*Debtors* [Docket No. 2398] (as it may be amended, supplemented, or modified from time to 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**, on October 26, 2018, the Bankruptcy Court entered an order confirming the Plan [Docket No. 2903];

E. **WHEREAS**, the effective date of the Plan occurred and the Liquidation Trust was established on February 15, 2019;

F. **WHEREAS**, the Claimant is the beneficial Holder of a Class 3 Standard Note Claim (the “Claim”);

G. **WHEREAS**, the Debtors’ books and record reflect that Claimant is the beneficiary of the Claim, and that the legal owner of the Claim is Prov. Tr GP – FBO Raymond M. Sykes IRA;

H. **WHEREAS**, the Debtors’ Schedule of Principal Amounts and Prepetition Distributions, which is Schedule 3 to the Disclosure Statement, sets forth that, after subtracting Prepetition Distributions from the Claim, the “net” amount of the Claim is \$39,102.39;

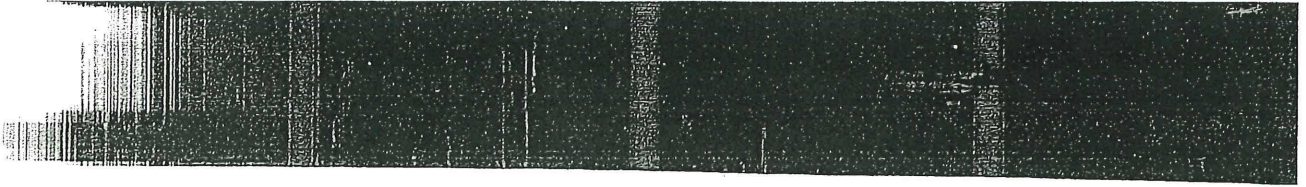
I. **WHEREAS**, on the Claimant’s Class 3 Ballot, the Claimant disputed the Debtors’ calculation of the Claim, thereby becoming a Disputing Claimant under the Plan with respect to such Claim;

J. **WHEREAS**, the Parties have conferred regarding the Prepetition Distributions received by the Claimant and the calculation of the Claimant’s Claim and have determined that the appropriate amount of the Claimant’s Claim is \$39,102.39; and

K. **WHEREAS**, the Parties have conferred regarding ownership of the Claim and have determined that legal title to the Claim is held by Prov. Tr GP – FBO Raymond M. Sykes IRA, with an address at Provident Trust Group, LLC, Attn: Lockbox, P.O. Box 4330, Ontario, CA 91761.

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

1. Recitals A through K, inclusive, are true and correct and are an integral part of this Stipulation.
2. The Claim shall be an Allowed Class 3 Standard Note Claim in the amount of \$39,102.39.
3. The Claimant shall be deemed to have elected not to become a Disputing Claimant on the Claimant's Class 3 Ballot with respect to the Claim.
4. The creditor name in respect of the Claim shall be modified to Prov. Tr GP – FBO Raymond M. Sykes IRA and any distributions made on account of the Claim shall be sent to the following address, Provident Trust Group, LLC, Attn: Lockbox, P.O. Box 4330, Ontario, CA 91761.
5. 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.



Dated: 5/16, 2019

WOODBIDGE LIQUIDATION TRUST

By: \_\_\_\_\_  
Name:  
Title:

RAYMOND SYKES

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