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CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                                       |   |                                 |
|---------------------------------------|---|---------------------------------|
| In Re:                                | ) | Chapter 11                      |
|                                       | ) |                                 |
| WOODBIDGE GROUP OF                    | ) | Case No. 17-12560 (BLS)         |
| COMPANIES, LLC, <i>et al.</i> ,       | ) |                                 |
|                                       | ) | (Jointly Administered)          |
| Remaining Debtors.                    | ) |                                 |
| _____                                 | ) |                                 |
|                                       | ) |                                 |
| MICHAEL GOLDBERG, as Liquidating      | ) | Adversary Proceeding            |
| Trustee of the Woodbridge Liquidation | ) | Case No. 19-50312 (BLS)         |
| Trust, successor in interest to the   | ) |                                 |
| estates of WOODBRIDGE GROUP           | ) | DEFENDANT'S, NOYES',            |
| OF COMPANIES, LLC, <i>et. al.</i> ,   | ) | ANSWER TO COMPLAINT             |
|                                       | ) | FOR AVOIDANCE AND RECOVERY      |
| Plaintiff,                            | ) | OF PREFERENTIAL AND             |
|                                       | ) | FRAUDULENT TRANSFERS            |
| v.                                    | ) | PURSUANT TO                     |
|                                       | ) | 11 U.S.C. §§544, 547, 548 & 550 |
| MARY M. NOYES; GALE E. NOYES,         | ) |                                 |
|                                       | ) |                                 |
| vs.                                   | ) |                                 |
|                                       | ) |                                 |
|                                       | ) |                                 |
| Defendants.                           | ) |                                 |
| _____                                 | ) |                                 |

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.

1 COMES NOW the Defendants, GALE E. NOYES and MARY M. NOYES,  
2 husband and wife, by and through their attorney, STEVEN H. SACKMANN, and  
3 answers Plaintiff's Complaint as follows:  
4

5  
6 **Nature of the Action**  
7

- 8 1. Defendants admit the allegations contained in Paragraph 1.  
9

10  
11  
12 **The Parties**  
13

- 14 2. Defendants deny the allegations contained in Paragraph 2.  
15  
16 3. Defendants admit the allegations contained in Paragraph 3.  
17  
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19

20 **Jurisdiction and Venue**  
21

- 22 4. Defendants admit the allegations contained in Paragraph 4.  
23  
24 5. Defendants admit the allegations contained in Paragraph 5.  
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26 6. Defendants admit the allegations contained in Paragraph 6.  
27  
28 7. Defendants admit the allegations contained in Paragraph 7.  
29  
30 8. Defendants admit the allegations contained in Paragraph 8.  
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32

33 **Case Background**  
34

- 35  
36 9. Defendants admit the allegations contained in Paragraph 9.  
37  
38 10. Defendants admit the allegations contained in Paragraph 10.  
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40

41 **Facts**  
42

- 43  
44 11. Defendants admit the allegations contained in Paragraph 11.  
45  
46 12. Defendants deny for lack of information the allegations contained in  
47 Paragraph 12.  
48

1 13. Defendants deny for lack of information the allegations contained in  
2 Paragraph 13.

3  
4 14. Defendants deny for lack of information the allegations contained in  
5 Paragraph 14.

6  
7 15. Defendants deny the allegations contained in Paragraph 15.

8  
9 16. Defendants admit the receipt of repayment of \$200,000 and deny the  
10 remaining allegations contained in Paragraph 16.

11  
12 17. Defendants deny for lack of information the allegations contained in  
13 Paragraph 17.

14  
15 18. Defendants admit the receipt of repayment of \$37,877.00 and deny the  
16 remaining allegations contained in Paragraph 18.

17  
18 19. Defendants deny for lack of information the allegations contained in  
19 Paragraph 19.

20  
21  
22  
23 **FIRST CLAIM FOR RELIEF**

24  
25 **(Avoidance of Preferential Transfers – 11 U.S.C. §547)**

26  
27 20. Defendants admit and deny the allegations of above paragraphs as set  
28 forth above.

29  
30 21. Defendants admit the receipt of repayment of \$200,000 and deny the  
31 remaining allegations contained in Paragraph 21.

32  
33 22. Defendants admit the allegations contained in Paragraph 22.

34  
35 23. Defendants admit the allegations contained in Paragraph 23.

36  
37 24. Defendants admit the allegations contained in Paragraph 24.

38  
39 25. Defendants deny the allegations contained in Paragraph 25.

40  
41 26. Defendants deny for lack of information the allegations contained in  
42 Paragraph 26.

43  
44 27. Defendants deny for lack of information the allegations contained in  
45 Paragraph 27.

46  
47 28. Defendants admit the allegations contained in Paragraph 28.

1 29. Defendants deny the allegations contained in Paragraph 29.  
2  
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5 **SECOND CLAIM FOR RELIEF**  
6

7 **(Recovery of Property – 11 U.S.C. §550)**  
8

9 30. Defendants admit and deny the allegations of above paragraphs as set  
10 forth above.  
11

12 31. Defendants deny the allegations contained in Paragraph 31.  
13

14 32. Defendants admit the allegations contained in Paragraph 32.  
15

16 33. Defendants deny the allegations contained in Paragraph 33.  
17  
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19

20 **THIRD CLAIM FOR RELIEF**  
21

22 **(To Avoid Intentionally Fraudulent Transfers under 11 U.S.C. §544(b)**  
23 **and 548(a)(1)(A), and Cal. Civ. Code § 3439, et seq.)**  
24

25 34. Defendants admit and deny the allegations of above paragraphs as set  
26 forth above.  
27

28 35. Defendants deny the allegations contained in Paragraph 35.  
29

30 36. Defendants deny the allegations contained in Paragraph 36.  
31  
32  
33

34 **FOURTH CLAIM FOR RELIEF**  
35

36 **(Recovery of Property – 11 U.S.C. §544(b) and 550**  
37 **and Cal. Civ. Code § 3439, et seq.)**  
38

39 37. Defendants admit and deny the allegations of above paragraphs as set  
40 forth above.  
41

42 38. Defendants admit the allegations contained in Paragraph 38.  
43

44 39. Defendants deny the allegations contained in Paragraph 39.  
45  
46  
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**AFFIRMATIVE DEFENSES**

WHEREFORE, having answered Plaintiff's Complaint, Defendants set forth affirmative defenses as follows:

1. Defendants would or should be classified as a "noteholder claimant" for whom the express provisions of Paragraph 3.11.2 on Page 26 of the Plan (Doc. 2283) apply.

2. The Plan waives and releases all actions to avoid or recover repayments of consideration and Plaintiff is estopped to recover such payments.

Defendants reserve the right to amend their answer and assert additional affirmative defenses and/or counterclaims as disclosed by subsequent discovery.

**PRAYER FOR RELIEF**

WHEREFORE, having answered Plaintiff's Complaint and having set forth Affirmative Defenses, Defendants pray for judgment as follows:

1. For dismissal of Plaintiff's Complaint with prejudice and without costs;

2. For an award of reasonable attorney fees and statutory costs incurred in this action;

3. For such other and further relief as the Court deems just and equitable in the premises.

///End of Body of Document///

DATED this 7th day of December, 2020.



---

GALE E. NOYES, Defendant  
Appearing Pro Se  
PO Box 87  
Warden, Washington 98857

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**VERIFICATION**

I, GALE E. NOYES, do declare as follows:

I am one of the Defendants in the above-entitled action, I have read the foregoing Answer to Complaint, know the contents thereof, and believe the same to be true.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED this 7th day of December, 2020, at Othello, Washington.



GALE E. NOYES, Defendant

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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|---------------------------------------|---|-------------------------|
| In Re:                                | ) | Chapter 11              |
|                                       | ) |                         |
| WOODBRIDGE GROUP OF                   | ) | Case No. 17-12560 (BLS) |
| COMPANIES, LLC, <i>et al.</i> ,       | ) |                         |
|                                       | ) | (Jointly Administered)  |
| Remaining Debtors.                    | ) |                         |
| <hr/>                                 | ) |                         |
|                                       | ) |                         |
| MICHAEL GOLDBERG, as Liquidating      | ) | Adversary Proceeding    |
| Trustee of the Woodbridge Liquidation | ) | Case No. 19-50312 (BLS) |
| Trust, successor in interest to the   | ) |                         |
| estates of WOODBRIDGE GROUP           | ) | DEFENDANT'S, NOYES',    |
| OF COMPANIES, LLC, <i>et. al.</i> ,   | ) | DECLARATION OF SERVICE  |
|                                       | ) |                         |
| Plaintiff,                            | ) |                         |
|                                       | ) |                         |
| v.                                    | ) |                         |
|                                       | ) |                         |
| MARY M. NOYES; GALE E. NOYES,         | ) |                         |
|                                       | ) |                         |
| vs.                                   | ) |                         |
|                                       | ) |                         |
| Defendants.                           | ) |                         |
| <hr/>                                 | ) |                         |

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.



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I, GALE E. NOYES, pursuant to RCW 9A.72.085 declare:

1. I am over the age of 18, am competent to testify as to the matters set forth below, and have personal knowledge of those matters.

2. That on the 7th day of December, 2020, I true and correct copy of:

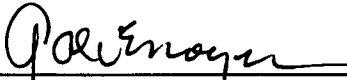
a. Defendant's, Noyes', Answer to Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. §§544, 547, 548 & 550

was served upon the following:

Mr. Jeffrey P. Nolan  
Pachulski Stang Ziehl Jones  
10100 Santa Monica Blvd. 13th Floor  
Los Angeles, CA 90067-4003

and on the said day deposited the same so addressed, with the postage thereon prepaid, in the United States Post Office in the City of Othello, State of Washington.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct on this 7th day of December, 2020, at Othello, Washington.

  
\_\_\_\_\_  
GALE E. NOYES, Defendant  
Appearing Pro Se  
PO Box 87  
Warden, Washington 98857

**FILED**

Gale E. and Mary M. Noyes  
c/o PO Box 409  
Othello, Washington 99344  
(509) 488-5636

2020 DEC 10 AM 8:49

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

December 7, 2020

Clerk of the Court  
United States Bankruptcy Court  
District of Delaware  
824 Market Street North, 3rd Floor  
Wilmington, DE 19801

Re: Gale and Mary Noyes  
My File No.: 7618-19

Michael Goldberg, Liquidating Trustee  
Woodbridge Group of Companies, LLC  
Cause No.: 17-12560 (KJC)

Goldberg vs. Noyes  
Adversary Cause No.: 19-50312 (BLS)

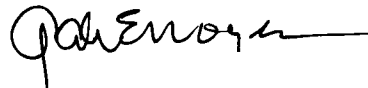
Dear Clerk:

Please find enclosed the following:

1. Defendant's, Noyes', Answer to Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. §§544, 547, 548 & 550
2. Declaration of Service

I have also enclosed an additional copy to be filed and returned to me in the envelope provided. Thank you.

Very truly yours,



Gale E. Noyes

GE:nda  
Enclosure