IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11

WOODBRIDGE GROUP OF COMPANIES, LLC, et al., ¹

Case No. 17-12560 (BLS)

(Jointly Administered)

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, *et al.*,

Adversary Proceeding Case No. 19-50341 (BLS)

Plaintiff,

VS.

JEFF SCHUSTER,

Defendant.

STIPULATION REGARDING APPOINTMENT OF MEDIATOR

Pursuant to this Court's September 3, 2020, scheduling order (the "Scheduling Order"), plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust, and defendant Jeff Schuster, stipulate as follows:

- 1. Ian Connor Bifferato, Esquire, of The Bifferato Firm, P.A. shall be appointed as the mediator (the "Mediator") in this adversary proceeding.
- 2. The mediation between the parties shall proceed in accordance with the Scheduling Order and the deadlines set forth therein and shall be conducted in accordance with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for

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.

the District of Delaware and/or otherwise as may be agreed by the parties and the Mediator. The parties will select a date for commencement of the mediation.

STIPULATED AND AGREED:

Dated: November 5, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142) Andrew W. Caine (CA Bar No. 110345) Colin R. Robinson (DE Bar No. 5524) 919 North Market Street, 17th Floor P.O. Box 8705

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