

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

In re:

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

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.*,

Plaintiff,

vs.

THOMAS FURMAN,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding
Case No. 19-50299 (BLS)

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 Thomas Furman, stipulate as follows:

1. Derek C. Abbott, Esquire, of Morris, Nichols, Arsht & Tunnell LLP 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
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
crobinson@pszjlaw.com

Counsel to Plaintiff

BUCHANAN INGERSOLL & ROONEY
PC

/s/ Mark Pfeiffer

Mark Pfeiffer (admitted *pro hac vice*)
50 S. 16th Street, Suite 200
Philadelphia, PA 19102
Telephone: (215) 665-8700
Facsimile: (215) 665-8760
Email: mark.pfeiffer@bipc.com

And

Geoffrey G. Grivner (DE Bar No. 4711)
Buchanan Ingersoll & Rooney PC
919 North Market Street, Suite 990
Wilmington, DE 19801
Telephone: (302) 552-4207
Facsimile: (302) 552-4295
Email: geoffrey.grivner@bipc.com

Counsel to Defendant