IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Ref. Docket No. 4053

CERTIFICATE OF NO OBJECTION REGARDING MOTION TO CONVERT THE CLAIMS OF IRONBRIDGE ASSET FUND LLC, IRONBRIDGE ASSET FUND 1 LLC AND IRONBRIDGE ASSET FUND 2 LLC INTO ALLOWED CLASS 5 CLAIMS OF THE INDIVIDUAL FUND INVESTORS

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the *Motion to Convert the Claims of Ironbridge Asset Fund LLC, Ironbridge Asset Fund 1 LLC and Ironbridge Asset Fund 2 LLC into Allowed Class 5 Claims of the Individual Fund Investors* [Docket No. 4053] (the "Motion"), filed on November 19, 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 December 3, 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: December 9, 2019 Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073) Andrew W. Caine (CA Bar No. 110345) Bradford J. Sandler (DE Bar No. 4142) Colin R. Robinson (DE Bar No. 5524) 919 North Market Street, 17th Floor P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-4100

Fax: 302-652-4400

Email: rpachulski@pszjlaw.com acaine@pszjlaw.com

bsandler@pszjlaw.com crobinson@pszjlaw.com

-and-

KLEE, TUCHIN, BOGDANOFF & STERN LLP

Kenneth N. Klee (admitted *pro hac vice*) Michael L. Tuchin (admitted pro hac vice) David A. Fidler (admitted pro hac vice) Jonathan M. Weiss (admitted pro hac vice) 1999 Avenue of the Stars, 39th Floor Los Angeles, California 90067

Tel: (310) 407-4000 (310) 407-9090 Fax:

Counsel to the Woodbridge Liquidation Trust

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Ref. Docket No. 4053

ORDER ON MOTION OF LIQUIDATION TRUST TO CONVERT THE CLAIMS OF IRONBRIDGE ASSET FUND LLC, IRONBRIDGE ASSET FUND 1 LLC AND IRONBRIDGE ASSET FUND 2 LLC INTO ALLOWED CLASS 5 CLAIMS OF THE INDIVIDUAL FUND INVESORS

Upon consideration of the motion (the "Motion")² of the Liquidation Trust for the entry of an order (i) disallowing the Fund Claims; and (ii) allowing, in lieu of the Fund Claims, the Individual Investor Claims; 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 Trust and its beneficiaries and all parties in interest; and after due deliberation and good and sufficient cause appearing therefor,

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.

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

IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED as set forth herein.
- 2. The Fund Claims are hereby disallowed in their entirety.
- 3. The Individual Investor Claims are hereby deemed Allowed Class 5 Claims (as defined in the Plan), for all purposes under the Plan, in the amounts set forth on **Exhibit C** attached to the Motion.
- 4. Garden City Group, Inc. is directed to modify the official claims register it maintains to comport with the relief granted by this Order.
- 5. This Court shall retain jurisdiction and power to hear and determine all matters arising from or related to the implementation of this Order.