

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

In re:

WOODBRIIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER
APPROVING STIPULATION REGARDING DISTRIBUTIONS TO CLAIMANT
HANA YAMATE-MORGAN AND HEIDI YAMATE-MORGAN**

The undersigned hereby certifies as follows:

1. 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”).² On October 26, 2018, the Bankruptcy Court entered an order confirming the Plan [Docket No. 2903]. The effective date of the Plan occurred and the Woodbridge Liquidation Trust (the “Liquidation Trust”) was established on February 15, 2019.

2. Hana Yamate-Morgan and Heidi Yamate-Morgan (together, “Claimant,” and with the Liquidation Trust, the “Parties” and each a “Party”) is the Holder of a Class 3 Standard Note Claim (the “Claim”), with a Net Note Claim amount of 21,666.60. On or about March 27, 2019, the Liquidation Trust mailed Claimant a check in the amount of \$1,137.49 (the “Initial Distribution Check”) to the address listed in Claimant’s Proofs of Claim.

3. Section 7.18 of the Plan provides, in pertinent part, that “[i]f the Holder of a Claim fails to cash a check payable to it within the time period set forth in Section 7.6, . . . then

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 defined herein shall have the meaning ascribed to such terms in the Plan.

such Holder shall be deemed to have forfeited its right to any reserved and future Distributions under the Plan. Any such forfeited Distributions shall be deemed Available Cash for all purposes, notwithstanding any federal or state escheat laws to the contrary.”

4. The Claimant represented to the Liquidation Trust that Claimant was unaware of the deadline to cash the Initial Distribution Check under Section 7.6 of the Plan.

5. The parties conferred and have entered into a stipulation (the “Stipulation”),³ pursuant to which, subject to Court approval, the Liquidation Trust will issue a replacement check, in the same amount as the Initial Distribution Check (the “Replacement Distribution Check”). A copy of the Stipulation is attached as Exhibit 1 to the proposed order approving the Stipulation (the “Proposed Order”) attached hereto as **Exhibit A**.

WHEREFORE, the parties respectfully request that the Court enter the Proposed Order at its earliest convenience without further notice or a hearing.

Dated: December 27, 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)

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-and-

³ Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and Its Affiliated Debtors, as confirmed by the Court* [Docket No. 2903] (the “Plan”).

KLEE, TUCHIN, BOGDANOFF & STERN LLP

Kenneth N. Klee (*pro hac vice*)

Michael L. Tuchin (*pro hac vice*)

David A. Fidler (*pro hac vice*)

Jonathan M. Weiss (*pro hac vice*)

1999 Avenue of the Stars, 39th Floor

Los Angeles, California 90067

Tel: (310) 407-4000

Counsel to the Woodbridge Liquidation Trust

EXHIBIT A

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

In re:

WOODBRIIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

**ORDER APPROVING STIPULATION REGARDING DISTRIBUTIONS TO
CLAIMANT HANA YAMATE-MORGAN AND HEIDI YAMATE-MORGAN**

Upon consideration of the Certification of Counsel;² and upon review of such certification and the Parties' *Stipulation Regarding Distributions to Claimant Hana Yamate-Morgan and Heidi Yamate-Morgan* attached hereto as **Exhibit 1** (the "Stipulation"); and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The Stipulation is approved.

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 meaning ascribed to them in the Certification of Counsel.

2. This Court shall have exclusive jurisdiction and power to resolve any dispute arising out of, relating to, or deriving from the Stipulation and has the jurisdiction and power to enter a final order thereon.

EXHIBIT 1 TO ORDER

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

In re:

WOODBRIIDGE GROUP OF
COMPANIES, LLC, *et al.*,¹

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

**STIPULATION REGARDING DISTRIBUTIONS TO CLAIMANT
HANA YAMATE-MORGAN AND HEIDI YAMATE-MORGAN**

This Stipulation is entered into by and between, on the one hand, Hana Yamate-Morgan and Heidi Yamate-Morgan (together, “Claimant”) and, on the other hand, the Woodbridge Liquidation Trust (the “Liquidation Trust,” and with 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”);²

C. **WHEREAS**, Section 7.6 of the Plan provides, in pertinent part, that “Cash payments made pursuant to the Plan in the form of checks shall be null and void if not cashed

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 defined herein shall have the meaning ascribed to such terms in the Plan.

within 180 calendar days of the date of issuance thereof;”

D. **WHEREAS**, Section 7.18 of the Plan provides, in pertinent part, that “[i]f the Holder of a Claim fails to cash a check payable to it within the time period set forth in Section 7.6, . . . then such Holder shall be deemed to have forfeited its right to any reserved and future Distributions under the Plan. Any such forfeited Distributions shall be deemed Available Cash for all purposes, notwithstanding any federal or state escheat laws to the contrary;”

E. **WHEREAS**, on October 26, 2018, the Bankruptcy Court entered an order confirming the Plan [Docket No. 2903];

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

G. **WHEREAS**, Claimant is the Holder of a Class 3 Standard Note Claim (the “Claim”), with a Net Note Claim amount of \$21,666.60;

H. **WHEREAS**, on or about March 27, 2019, the Liquidation Trust mailed Claimant a check in the amount of \$1,137.49 (the “Initial Distribution Check”);

I. **WHEREAS**, Claimant did not cash the Initial Distribution Check within the 180-day period set forth in Section 7.6 of the Plan;

J. **WHEREAS**, Claimant represents that Claimant was unaware of the deadline to cash the Initial Distribution Check under Section 7.6 of the Plan;

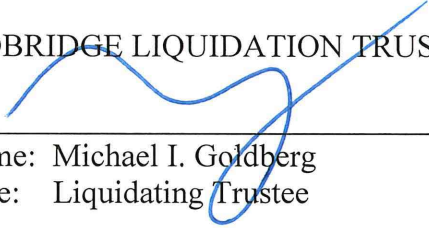
K. **WHEREAS**, the Parties have conferred regarding the matters described above and have agreed, subject to Court approval, that the Liquidation Trust will issue a replacement check, in the same amount as the Initial Distribution Check (the “Replacement Distribution Check”), to Claimant and that Claimant shall not be deemed to have forfeited Claimant’s right to the Replacement Distribution Check or to any future Distributions under the Plan.

NOW THEREFORE, the Parties agree as follows:

1. The foregoing Recitals are true and correct and are an integral part of this Stipulation.
2. Within thirty (30) days after entry of a Bankruptcy Court order approving this Stipulation, the Liquidation Trust shall issue the Replacement Distribution Check to Claimant in the amount of \$1,137.49.
3. Notwithstanding Section 7.18 of the Plan, Claimant shall not be deemed – by virtue of not having cashed the Initial Distribution Check previously sent to Claimant – to have forfeited Claimant’s right to receive the Replacement Distribution Check or future Distributions under the Plan.
4. Nothing in this Stipulation or the order approving this Stipulation shall waive or modify the Liquidation Trust’s rights, including, without limitation, its rights under Section 7.6 and Section 7.18 of the Plan, with respect to the Replacement Distribution Check or any future Distributions to Claimant.
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: December 27th, 2019

WOODBRIIDGE LIQUIDATION TRUST

By: 
Name: Michael I. Goldberg
Title: Liquidating Trustee

HANA YAMATE-MORGAN

By: _____
Name: Hana Yamate-Morgan

HEIDI YAMATE-MORGAN

By: _____
Name: Heidi Yamate-Morgan

NOW THEREFORE, the Parties agree as follows:

1. The foregoing Recitals are true and correct and are an integral part of this Stipulation.
2. Within thirty (30) days after entry of a Bankruptcy Court order approving this Stipulation, the Liquidation Trust shall issue the Replacement Distribution Check to Claimant in the amount of \$1,137.49.
3. Notwithstanding Section 7.18 of the Plan, Claimant shall not be deemed – by virtue of not having cashed the Initial Distribution Check previously sent to Claimant – to have forfeited Claimant’s right to receive the Replacement Distribution Check or future Distributions under the Plan.
4. Nothing in this Stipulation or the order approving this Stipulation shall waive or modify the Liquidation Trust’s rights, including, without limitation, its rights under Section 7.6 and Section 7.18 of the Plan, with respect to the Replacement Distribution Check or any future Distributions to Claimant.
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: 12/26/, 2019

WOODBIDGE LIQUIDATION TRUST

By: _____
Name: Michael I. Goldberg
Title: Liquidating Trustee

HANA YAMATE-MORGAN

By: Hana Yamate-Morgan
Name: Hana Yamate-Morgan

Signature
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12/26/2019

HEIDI YAMATE-MORGAN

By: Heidi Yamate-Morgan
Name: Heidi Yamate-Morgan