

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC, *et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Hrg. Date: May 27, 2020 at 10:30 a.m. (ET)

Obj. Deadline: May 6, 2020 at 4:00 p.m. (ET)

**TWENTY-FIFTH (25TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION  
TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

**PARTIES RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES  
AND THEIR DISPUTED CLAIMS IDENTIFIED ON EXHIBIT A  
TO THE PROPOSED ORDER**

**BY THIS OBJECTION, THE TRUST IS NOT MODIFYING THE AMOUNT OF ANY  
NET NOTE CLAIM OR NET UNIT CLAIM FOR ANY DISPUTED CLAIM  
HEREUNDER FROM THE AMOUNTS PREVIOUSLY CALCULATED BY THE  
DEBTORS AND SET FORTH ON THE APPLICABLE BALLOT, WHICH AMOUNT  
EACH CLAIMANT SUBJECT TO THIS OBJECTION HAS NOT DISPUTED.**

Woodbridge Liquidation Trust (the “Trust”), formed pursuant to the confirmed and effective *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [D.I. 2397] (the “Plan”) in the jointly-administered chapter 11 bankruptcy cases (the “Chapter 11 Cases”) of Woodbridge Group of Companies, LLC and its affiliated debtors (the “Debtors”), hereby files this objection (this “Objection”), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1531 (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and

<sup>1</sup> 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.

Rules 3007-1 and 3007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), to each of the claims filed against the Debtors and their estates that are listed on Exhibit A (collectively, the “Disputed Claims”) to the proposed form of order attached hereto as Exhibit 2 (the “Proposed Order”), and request the entry of the Proposed Order modifying the Disputed Claims, as indicated in further detail below and on Exhibit A to the Proposed Order. In support of this Objection, the Trust relies on the declaration of Thomas P. Jeremiassen (the “Jeremiassen Declaration”), a copy of which is attached hereto as Exhibit 1. In further support of this Objection, the Trust respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and, pursuant to Local Rule 9013-1(f), the Trust consents to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief requested herein are Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2.<sup>2</sup>

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

### **GENERAL BACKGROUND**

2. On December 4, 2017, 279 of the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code, and on February 9, 2018, March 9, 2018, March 23, 2018, and March 27 2018, additional affiliated Debtors (27 in total) commenced voluntary cases under chapter 11 of the Bankruptcy Code (collectively, the “Petition Dates”). Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors managed their financial affairs as debtors in possession.

3. The Chapter 11 Cases were jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. No trustee or examiner was appointed in the Chapter 11 Cases.

4. Information about the Debtors’ business, capital structure and the events leading up to the commencement of these Chapter 11 Cases is set forth in the *Disclosure Statement for the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [D.I. 2398].

### **DEBTORS’ SCHEDULES; BAR DATE ORDER; AND PROOFS OF CLAIM**

5. On December 5, 2017, the Court entered an order [D.I. 46] appointing Garden City Group, LLC (“GCG”) as claims and noticing agent in these Chapter 11 Cases. Among other things, GCG is authorized to (a) receive, maintain, and record and otherwise administer the proofs of claim filed in these Chapter 11 Cases and (b) maintain the official claims register for the Debtors.

6. On April 5, 2018, the Court entered an order [D.I. 911] (the “Bar Date Order”) establishing, *inter alia*, June 19, 2018 (the “Bar Date”) as the general bar date for the filing of proofs of claim against the Debtors. On April 20, 2018, the Debtors filed the *Notice of Deadlines for Filing of Proofs of Claim and Proofs of Interest* [D.I. 1599] (the “Bar Date Notice”), pursuant

to which the Debtors provided notice of, *inter alia*, the Bar Date. The Debtors served the Bar Date Notice in accordance with the procedures set forth in the Bar Date Order. *See* D.I. 1688 (Affidavit of Service).

7. On April 15 and 16, 2018, the Debtors filed their Schedules of Assets and Liabilities.

8. On August 3, 2018, the Debtors filed the *Disclosure Statement for the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [Docket No. 2284] (as subsequently revised, the “Disclosure Statement”). The Disclosure Statement included, as Schedule 3 thereto, a “Schedule of Principal Amounts and Prepetition Distributions,” which set forth the Debtors’ calculation of Net Note Claims<sup>3</sup> and Net Unit Claims.<sup>4</sup> With respect to a small number of claimants, the Debtors subsequently filed a revised Schedule of Principal Amounts and Prepetition Distributions. *See* Docket No. 2639.

9. On August 21, 2018, the Court entered the *Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Scheduling Plan Confirmation Hearing and Approving For and Manner of Related Notice and Objection Procedures, (IV) Approving Solicitation Packages and Procedures and Deadlines for Soliciting, Receiving, and Tabulating Votes on the Plan, and (V) Approving Forms of Ballots and Notice to Non-Voting Classes* [Docket No. 2396] (the “Solicitation Procedures Order”).

10. The Solicitation Procedures Order approved and attached, as Exhibit 2 thereto, forms of ballots, including ballots for Noteholders and Unitholders (each, a “Ballot”). Each Ballot mailed to a Noteholder or Unitholder (other than Excluded Parties, none of whom are the subject

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<sup>3</sup> The Outstanding Principal Amount of the Note Claims held by a particular Noteholder, minus the aggregate amount of all Prepetition Distributions received by such Noteholder.

<sup>4</sup> The Outstanding Principal Amount of the Unit Claims held by a particular Unitholder, minus the aggregate amount of all Prepetition Distributions received by such Unitholder.

of this Objection) set forth the amount of such claimant's Net Note Claim and/or Net Unit Claim, as applicable, and explained in bold font that: **"Unless you check the box in this Item 3 indicating that you disagree with the Debtors' calculation, the Net [Note/Unit] Claim set forth in the Schedule of Principal Amounts and Prepetition Distributions will be the amount of your Net [Note/Unit] Claim for purposes of Distributions under the Plan."** Each Ballot provided the option for a claimant to check a box next to bold text stating that: **"The undersigned Claimant DISPUTES the Net [Note/Unit] Claim amounts set forth in the Schedule of Principal Amounts and Prepetition Distributions."**

11. No claimant holding a Disputed Claim subject to this Objection elected to opt out of the Debtors' calculation of such claimant's Net Note Claim and/or Net Unit Claim. Accordingly, pursuant to the Solicitation Procedures Order, those amounts (rather than the amounts in the proofs of claim) are the amounts of the Net Note Claims and Net Unit Claims for purposes of distributions in respect of the Disputed Claims under the Plan.

12. In addition, the Disputed Claims on Exhibit A also assert that the respective claim (or a portion thereof) is entitled to secured and/or priority status. The Plan does not afford such status to Class 3 Standard Note Claims or Class 5 Unit Claims; rather, the Plan's treatment of Class 3 Standard Note Claims and Class 5 Unit Claims is as unsecured claims not entitled to any priority. No Holder of a Disputed Claim (or any Holder of a Claim in Class 3 or Class 5) elected to dispute or otherwise object to such Holder's classification under the Plan.

### **RELIEF REQUESTED**

13. By this Objection, the Trust requests that the Court enter the Proposed Order, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rules 3007-

1 and 3007-2, modifying the Disputed Claims, as indicated in further detail below and on Exhibit A to the Proposed Order.

14. In accordance with Local Rule 3007-1(e)(i)(E), the Trust believes that this Objection complies in all material respects with Local Rule 3007-1.

### **OBJECTION TO DISPUTED CLAIMS**

15. Each of the Disputed Claims listed on Exhibit A to the Proposed Order is a proof of claim in respect of Notes and/or Units filed by a claimant who did *not* elect to dispute the amount of such claimant's Net Note Claim and/or Net Unit Claim in accordance with the Court's Solicitation Procedures Order. However, because the Bar Date passed before claimants viewed the Disclosure Statement, many claimants filed claims, and included in such claims a claim amount that differed from the amount of the Net Note Claim or Net Unit Claim included in the Schedule of Principal Amounts and Prepetition Distributions. Because these claimants subsequently did not dispute the Debtors' calculation of their Net Claims, the amount set forth in the Disputed Claims have therefore been superseded. The Trust files this Objection simply to ensure that the claims register reflects the correct amount of each Disputed Claim—namely, the undisputed amount of each Net Note Claim or Net Unit Claim. The Disputed Claims on Exhibit A are Disputed Claims that contain an amount that differs from the undisputed Net Claim amount.

16. In addition, the Disputed Claims on Exhibit A also assert that the respective claim (or a portion thereof) is entitled to secured and/or priority status. The Plan does not afford such status to Class 3 Standard Note Claims or Class 5 Unit Claims; rather, the Plan's treatment of Class 3 Standard Note Claims and Class 5 Unit Claims is as unsecured claims not entitled to any priority. No Holder of a Disputed Claim (or any Holder of a Claim in Class 3 or Class 5) elected to dispute

or otherwise object to such Holder's classification under the Plan. Accordingly, no Disputed Claim is entitled to secured and/or priority status.

17. Accordingly, Exhibit A contains Disputed Claims in respect of which the Trust seeks to modify the amount of the Disputed Claim, and to change the status of the Disputed Claim to an unsecured claim not entitled to priority, consistent with the claimant's Class 3 and/or Class 5 (as applicable) treatment under the Plan.

18. To conform the claims register to the Trust's books and records, the Plan, and the respective Ballots submitted by these claimants, the Trust therefore seeks to make modifications to the Disputed Claims, as more specifically set forth on Exhibit A to the Proposed Order with respect to each Disputed Claim, to indicate (i) that each Disputed Claim is in the undisputed amount set forth on the applicable Ballot for the respective Claim and (ii) that none of the Disputed Claims are entitled to secured or priority status.<sup>5</sup>

19. For the avoidance of doubt, pursuant to this Objection, **the Trust is not modifying the amount of any Net Note Claim or Net Unit Claim from the amounts previously calculated by the Debtors and set forth on the applicable Ballot, which amount each claimant in respect of a Disputed Claim has not disputed.** Rather, the Trust is modifying the amounts set forth in the proofs of claim for the Disputed Claims to conform to the amounts of the undisputed Net Note Claims and/or Net Unit Claims previously calculated by the Debtors and set forth on the applicable Ballot. Because no claimant in respect of a Disputed Claim elected to dispute (i) the amount of such claimant's Net Note Claim and/or Net Unit Claim in accordance with the Court's Solicitation

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<sup>5</sup> Certain of the Disputed Claims on Exhibit A are also subject to the Debtors' previously filed *Fourth (4th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* [Docket No. 3380] or the *Fifth (5th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* [Docket No. 3381], pursuant to which the Debtors sought to make ministerial changes to modify the creditor name and/or payment address for such claims to conform to the Debtors' books and records.

Procedures Order or (ii) the classification of such Claims as either Class 3 Standard Note Claims or Class 5 Unit Claims, the amounts set forth in the Ballots (rather than the amounts in the proofs of claim) are the amounts of the Net Note Claims and Net Unit Claims for purposes of distributions in respect of the Disputed Claims, and such Claims are not entitled to secured or priority status.

### **RESPONSES TO THIS OBJECTION**

20. Any responses to this Objection must be filed **on or before 4:00 p.m. (ET) on May 6, 2020**, in accordance with the procedures set forth in the notice of this Objection.

### **RESERVATION OF RIGHTS**

21. The Trust reserves the right to adjourn the hearing on any Disputed Claim, and in the event that the Trust does so, the Trust will state the same in the agenda for the hearing on that Disputed Claim, which agenda will be served on the applicable claimant.

22. The Trust reserves any and all rights to amend, supplement, or otherwise modify this Objection, the Proposed Order, or Exhibit A thereto, and to file additional objections to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Disputed Claims. The Trust also reserves any and all rights, claims and defenses with respect to any and all of the Disputed Claims, and nothing included in or omitted from this Objection, the Proposed Order, or Exhibit A thereto is intended or shall be deemed to impair, prejudice, waive, or otherwise affect any rights, claims, or defenses of the Trust with respect to the Disputed Claims.

### **REQUEST FOR WAIVER**

23. Although the Trust does not believe this Objection is one “based on substantive grounds, other than incorrect classification of a claim,” Del. Bankr. L.R. 3007-1(f)(iii), and therefore does not believe that the Objection is required to “include all substantive objections to such claim,” *id.*, or is limited to 150 claims, Del. Bankr. L.R. 3007-1(f)(i), this Objection requests



(out of an abundance of caution) a waiver of Local Rules 3007-1(f)(iii) and (f)(i) to the extent such rules might otherwise be construed to apply. Such a waiver is authorized by Local Rule 1001-1(c), which provides that “[t]he application of these Local Rules in any case or proceeding may be modified by the Court in the interest of justice,” Del. Bankr. L.R. 3007-1(f)(i), and is proper in this instance given that the modifications to the claims register requested by the Trust hereby are ministerial rather than substantive.

### **NOTICE**

24. Notice of this Objection has been provided to the following parties: (i) the United States Trustee for the District of Delaware; (ii) the Trust and its counsel; (iii) any person whose rights are affected by this Objection; and (iv) any Person filing a specific request for notices and papers on and after the Effective Date. The Trust submits that, in light of the nature of the relief requested herein, no other or further notice need be given.

*[Remainder of page intentionally left blank.]*

**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Trust respectfully requests that the Court (a) enter the Proposed Order, and (b) grant such other and further relief as may be just and proper.

Dated: April 22, 2020  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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-and-

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**EXHIBIT 1**

Declaration of Thomas P. Jeremiassen

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC, *et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

**DECLARATION OF THOMAS P. JEREMIASSEN IN SUPPORT OF TWENTY-FIFTH  
(25TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS  
PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

I, Thomas P. Jeremiassen, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Senior Managing Director of Development Specialists, Inc. (“DSI”), located at 333 S. Grand Avenue Suite 4100, Los Angeles, California 90071. Following the “Effective Date” of the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and Its Affiliated Debtors* (the “Plan”), DSI has been engaged to provide forensic accounting and financial advisory services to the Woodbridge Wind-Down Entity LLC (the “Wind-Down Entity”) and the Woodbridge Liquidation Trust (the “Trust”).

2. Prior to the “Effective Date” of the Plan, I supported the Chief Restructuring Officer of WGC Independent Manager LLC, a Delaware limited liability company (“WGC Independent Manager”), which was the sole manager of Woodbridge Group of Companies, LLC, a Delaware limited liability company and an affiliate of each of the entities that were debtors and

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<sup>1</sup> 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.

debtors in possession (each, a “Debtor” and collectively, the “Debtors”) in the above-captioned jointly administered chapter 11 cases (the “Chapter 11 Cases”).

3. On February 13, 2018, the Court entered an order authorizing the Debtors to retain and employ DSI as their restructuring advisor. In such capacity, I became familiar with the day-to-day operations and financial affairs of the Debtors. I was one of the individuals responsible for implementing the Debtors’ wind-down and liquidation strategies and overseeing the Debtors’ financial and operational affairs. I have been consistently involved in or am familiar with the Debtors’ wind-down activities and development of the Plan.

4. I submit this declaration in support of the *Twenty-Fifth (25th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”).<sup>2</sup>

5. I am one of the persons responsible for overseeing the claims reconciliation and objection process in these Chapter 11 Cases. Considerable resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtors and their estates in the Chapter 11 Cases. The Disputed Claims were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate personnel and representatives of the Debtors, the Trust, and the Wind-Down Entity. These efforts resulted in the identification of the Disputed Claims.

6. The information contained in Exhibit A to the Proposed Order is true and correct to the best of my knowledge, information, and belief.

7. Through a review of the claims register maintained by the claims and noticing agent in these Chapter 11 Cases, the Ballots, and the Trust’s books and records, the Trust has determined

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

that each of the Disputed Claims listed on Exhibit A to the Proposed Order is a claim in respect of Notes and/or Units filed by a claimant who did not elect to dispute the amount of such claimant's Net Note Claim and/or Net Unit Claim in accordance with the Court's Solicitation Procedures Order, and who did not object to, or otherwise dispute, the classification of such Disputed Claim as a Class 3 Standard Note Claim or Class 5 Unit Claim (which classes are not afforded any secured or priority status under the Plan). Nevertheless, the Disputed Claims set forth a claim amount that differs from the Debtors' calculation of the amount of the respective Net Note Claim and/or Net Unit Claim as set forth on the applicable Ballot. To conform the claims register to the Trust's books and records, the Plan, and the respective Ballots submitted by these claimants, the Objection seeks to make modifications to the Disputed Claims to indicate (i) that each Disputed Claim is in the amount set forth on the applicable Ballot for the respective Net Note Claim and/or Net Unit Claim and (ii) that none of the Disputed Claims are entitled to secured or priority status.

8. I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.

Executed on April 22, 2020

/s/ Thomas P. Jeremiassen  
Thomas P. Jeremiassen

**EXHIBIT 2**

Proposed Order

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC, *et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Ref. Docket No. \_\_\_\_

**ORDER SUSTAINING TWENTY-FIFTH (25TH) OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

Upon consideration of the *Twenty-Fifth (25th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”)<sup>2</sup> and the Jeremiassen Declaration; and it appearing that this Court has jurisdiction to consider the Objection pursuant to 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 as of February 29, 2012; and it appearing that venue of these Chapter 11 Cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Trust, its beneficiaries, and other parties in interest; and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record of these Chapter 11 Cases; and after due deliberation thereon and good and

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.



sufficient cause appearing therefor; it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Objection is SUSTAINED, as set forth herein.
2. The Disputed Claims identified on Exhibit A to this Order are hereby modified as set forth on Exhibit A with respect to each such Disputed Claim.
3. The Trust's objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
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. To the extent applicable to the Objection, Local Rules 3007-1(f)(i) and (iii) are hereby waived.
6. Any and all rights of the Trust to amend, supplement, or otherwise modify the Objection and to file additional objections to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Disputed Claims, shall be reserved. Any and all rights, claims, and defenses of the Trust with respect to any and all of the Disputed Claims shall be reserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive, or otherwise affect any rights, claims, or defenses of the Trust with respect to the Disputed Claims.

7. This Court shall retain jurisdiction and power over any and all affected parties with respect to any and all matters, claims, or rights arising from or related to the implementation or interpretation of this Order.

**EXHIBIT A**<sup>1</sup>

Disputed Claims

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<sup>1</sup> Capitalized terms used but not otherwise defined on Exhibit A shall have the meanings ascribed to such terms in the Objection.

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
GUANG M MA		2272	50,000.00	47,361.15	Secured/Unsecured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUSTODIAN FBO GUANG M MA		2271	73,921.25	70,122.51	Secured/Unsecured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUSTODIAN FBO GORDON MACALISTER		3183	60,000.00	59,354.17	Secured	General Unsecured	See Footnote 4
IRA SERVICES TRUST COMPANY CFBO JAMES M MACE		5021 5022	46,000.00 99,500.00	135,329.17	Secured Secured	General Unsecured	See Footnote 4
JUNE MACE		8909	60,000.00	60,000.00	Secured	General Unsecured	See Footnote 4
MAINSTAR - FBO GREGORY A MACEAU		4679	162,300.00	147,064.75	Secured	General Unsecured	See Footnote 4
MICHAEL H. MACGUFFIN & LISA A. MACGUFFIN		7339	50,291.67	48,395.84	Secured	General Unsecured	See Footnote 4
HORIZON TRUST CO FBO JUAN E. MACIAS IRA		6742	49,768.13	46,845.52	Secured	General Unsecured	See Footnote 4
JILL L MAENNER		1428 5677	100,000.00 100,000.00	83,902.71	Secured Secured	General Unsecured	See Footnote 4

<sup>1</sup> Pursuant to the Trust's books and records, the Disputed Claim is held in a manner other than as it was filed (i.e., through a legal custodian, jointly by two claimants). The Debtors (pre-Effective Date) objected to such Disputed Claim on that basis (in the Fourth and Fifth Omnibus Objections). For clarity, this Exhibit sets forth both the name of the applicable creditor as filed (the "Filed Creditor Name" column) as well as the name to which the Debtors' previous objections sought to modify the Disputed Claim (the "Modified Creditor Name" column).

<sup>2</sup> This number reflects the amount in which the applicable Disputed Claim was filed.

<sup>3</sup> This number reflects the amount to which the Trust proposes to modify each Disputed Claim.

<sup>4</sup> In accordance with the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors (the "Plan"), the claim amounts set forth for the Disputed Claims in the "Modified Amount" column represent the Debtors' calculation of the Net Note Claim or Net Unit Claim (as such terms are defined in the Plan) applicable to such Disputed Claim. No claimant in respect of a Disputed Claim herein elected in such claimant's ballot to dispute the amount of such claimant's Net Note Claim or Net Unit Claim. Accordingly, the Trust believes that each such Disputed Claim should be modified to reflect the amount of each undisputed Net Note Claim or Net Unit Claim. In addition, each Disputed Claim herein asserted entitlement to either secured and/or priority status. However, each Disputed Claim herein was classified as either a Class 3 Standard Note Claim or a Class 5 Unit Claim, and no holder of a Disputed Claim listed herein objected to, or otherwise disputed their classification. The Plan does not provide any secured or priority status to Class 3 Standard Note Claims or Class 5 Unit Claims. Accordingly, the Trust believes that each such Disputed Claim should also be modified to clarify that each is an unsecured claim not entitled to priority.

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
ANTOINETTE MAGARO	PROV. TR GP-FBO ANTOINETTE MAGARO IRA	1537	250,000.00	227,361.11	Secured	General Unsecured	See Footnote 4
ANTOINETTE MAGARO		1522	25,000.00	23,537.50	Secured	General Unsecured	See Footnote 4
MAGDOV CPA FIRM AN ACCOUNTANCY CORP		4601	26,584.16	23,842.74	Secured	General Unsecured	See Footnote 4
TERI L MAGNOTTI MAINSTAR TRUST IRA	MAINSTAR-FBO TERI L MAGNOTTI	2966	288,319.00	268,411.11	Secured	General Unsecured	See Footnote 4
PROVIDENT TRT GROUP-FBO JANET MAHANA IRA		5288	59,500.00	55,136.67	Secured	General Unsecured	See Footnote 4
BRENDA S MAHLER		2329	130,000.00	114,339.29	Secured	General Unsecured	See Footnote 4
ALAN & RUTH MAICKI		2820	40,000.00	39,077.76	Secured/Unsecured	General Unsecured	See Footnote 4
LEON F & CAROL S MAIERHAER		5324	50,000.00	49,951.39	Secured	General Unsecured	See Footnote 4
MAINE TSP HS DISTRICT EDU FOUNDATION		7823 7827	51,875.00 51,750.00		Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
TIMOTHY & SHERRI MAKELA		441	400,000.00	367,500.00	Secured	General Unsecured	See Footnote 4
MICHAEL J MALCOLM	YVONNE & MICHAEL MALCOLM	9107	50,000.00	49,697.92	Secured	General Unsecured	See Footnote 4
MARLENE MALLAH AND MAURICE MALLAH TRST		8237	1,007,333.33	895,129.72	Secured	General Unsecured	See Footnote 4
EDWARD F MALLOY		8459	25,000.00	24,906.25	Secured	General Unsecured	See Footnote 4
JAMES J & CHERI MALONEY		3244	25,000.00	23,183.33	Admin/Unsecured	General Unsecured	See Footnote 4
PROV. TR GP-FBO JOE L MALONEY IRA		3720	126,438.00	55,253.40	Secured/Priority	General Unsecured	See Footnote 4
ROSE R MALOOF RLT DTD 09/23/99		8331 8333	113,180.49 52,499.96		Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
MAURICE & AMY MAMO	THE MAMO FT DTD 11/18/02	2446	30,150.00	29,050.00	Secured	General Unsecured	See Footnote 4
MARK L MANDEVILLE & JENNIFER L MANDEVILLE		2388 2389 2390	100,000.00 40,000.00 60,000.00		Secured Secured Secured	General Unsecured	See Footnote 4

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
VITALINA RUIZ MANDUJANO		4208	30,000.00	29,750.00	Secured	General Unsecured	See Footnote 4
BUFORD ALONZO MANER & GAIL T MANER		6035	100,000.00	88,211.06	Secured	General Unsecured	See Footnote 4
ANTHONY J MANGIA		3560	100,583.33	98,930.56	Secured/Unsecured	General Unsecured	See Footnote 4
MAINSTAR-FBO E MANNABERG		6830	25,137.50	22,708.33	Secured	General Unsecured	See Footnote 4
GOLDMAN		4584	25,000.00	23,510.38	Secured	General Unsecured	See Footnote 4
D LEE MANNING & ELLEN MANNING	MAINSTAR-FBO DANNY C MANNING	1715	399,197.57	391,835.32	Secured/Unsecured	General Unsecured	See Footnote 4
DANNY C MANNING		9410	25,137.50	24,068.43	Secured	General Unsecured	See Footnote 4
WILBER MANNING AND PHILLIS MANNING		9469	100,000.00	92,315.85	Secured	General Unsecured	See Footnote 4
PHILLIS MANNING AND VERA PRYOR		9302 9767	100,000.00 100,000.00	98,166.67	Secured Secured	General Unsecured	See Footnote 4
RON MANZO		7466	25,134.62	24,082.46	Secured	General Unsecured	See Footnote 4
MAINSTAR TRUST, CUSTODIAN FBO MAY L. MAR #T2176303		7471	85,000.00	81,396.95	Secured	General Unsecured	See Footnote 4
MAINSTAR TRUST, CUSTODIAN FBO THERON EUGENE MARA		723	246,897.03	190,276.27	Secured	General Unsecured	See Footnote 4
FLORENCE MARANUK		993 994	25,000.00 25,000.00	41,625.70	Secured Secured	General Unsecured	See Footnote 4
JULIE MARCHANTE	MARIE & JULIE M MARCHANTE	995 996	160,000.00 50,000.00	205,120.81	Secured Secured	General Unsecured	See Footnote 4
THE MARIE MARCHANTE FAMILY TRUST 8/21/2000		8463	25,000.00	24,760.41	Secured	General Unsecured	See Footnote 4
RENEE MARCOZZI		3744	50,000.00	48,465.30	Secured	General Unsecured	See Footnote 4
IRA SVCS TR CO-CFBO		3745	25,000.00	24,222.20	Secured	General Unsecured	See Footnote 4
SHELDON M MARCUS IRA							
SHELDON M MARCUS							

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
MARIA E & LUIS A MARES		7068	50,000.00	49,193.05	Secured	General Unsecured	See Footnote 4
LEAH MARIE		5591	50,000.00	45,096.67	Secured	General Unsecured	See Footnote 4
JOYCE H. MARION REV LIVING TRUST		7540	60,330.00	54,544.89	Secured	General Unsecured	See Footnote 4
CONRAD J MARKER	PROV. TR GP-FBO CONRAD MARKER IRA	342	134,167.50	127,092.00	Secured	General Unsecured	See Footnote 4
PROV. TR GP-FBO MURRAY MARKOWITZ IRA		6840	120,742.50	98,660.00	Secured	General Unsecured	See Footnote 4
THE MURRAY AND LINDA MARKOWITZ RT		6861	120,742.50	101,315.00	Secured	General Unsecured	See Footnote 4
PATRICIA JAN MARKUM	MAINSTAR-FBO PATRICIA JAN MARKUM	1087	58,230.00	56,081.56	Secured	General Unsecured	See Footnote 4
PAUL MARNELL	MAINSTAR-FBO PAUL MARNELL	4378	100,440.00	93,534.75	Secured	General Unsecured	See Footnote 4
KERMIT W & NANCY R MARQUAND		8541 8543	50,333.33 51,340.00		Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
PROV. TR GP-FBO NANCY R MARQUAND ROTH IRA		8542	25,166.67	20,713.53	Secured/Unsecured	General Unsecured	See Footnote 4
JAMES MARS & ADRIENNE DRITZ-MARS		545	60,000.00	56,858.33	Secured	General Unsecured	See Footnote 4
JOHN ROBERT MARSH AND LINDA MARSH		495	25,000.00	24,091.00	Secured	General Unsecured	See Footnote 4
RONNIE ERROL MARSH		959	80,000.00	80,000.00	Secured/Unsecured	General Unsecured	See Footnote 4
CHRISTIAN T MARSHALL		3963	50,291.67	49,416.66	Secured/Unsecured	General Unsecured	See Footnote 4
HORIZON TRUST COMPANY CUSTODIAN FBO SARA L MARSHALL IRA		3920	201,000.00	180,133.37	Secured/Unsecured	General Unsecured	See Footnote 4
MARILYN MARSHALL		6701	100,000.00	94,850.00	Secured	General Unsecured	See Footnote 4
MICHAEL B MARSHALL		7069	25,000.00	24,737.50	Secured	General Unsecured	See Footnote 4
PROVIDENT TR GP FBO DENESE A MARSHALL IRA		1210 1214	116,000.00 40,000.00	118,664.44	Secured Secured	General Unsecured	See Footnote 4

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
PROVIDENT TRUST GR LLC FBO BEVERLY A MARSHALL IRA		7193	30,350.00	27,909.35	Secured	General Unsecured	See Footnote 4
SARA L MARSHALL		3921 3993	502,500.00 50,291.67	508,916.66	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
STEPHEN MARSHALL		2157	50,000.00	47,616.63	Secured	General Unsecured	See Footnote 4
BEATRICE E MARSTON	MAINSTAR-FBO BEATRICE MARSTON	376	8,600.00	8,430.87	Secured	General Unsecured	See Footnote 4
CHRISTOPHER & DANA LEE MARSTON		3575	134,000.00	131,856.00	Secured	General Unsecured	See Footnote 4
LORRI BETH MARSTON	MAINSTAR-FBO LORRI BETH MARSTON	439	92,500.00	91,266.67	Secured	General Unsecured	See Footnote 4
RICHARD LEE MARSTON	MAINSTAR-FBO RICHARD MARSTON	377	8,800.00	8,626.93	Secured	General Unsecured	See Footnote 4
RICHARD LEE MARSTON	MAINSTAR-FBO RICHARD MARSTON	378	75,300.00	73,090.72	Secured	General Unsecured	See Footnote 4
ANSEL EARL & BARBARA MARTIN		8533	50,000.00	49,458.32	Secured	General Unsecured	See Footnote 4
FRANCES & STEPHEN MARTIN		3504	30,000.00	28,315.42	Secured/Unsecured	General Unsecured	See Footnote 4
GRAHAM MARTIN		7072 7073 7074	350,000.00 125,000.00 125,000.00	570,097.14	Secured Secured Secured	General Unsecured	See Footnote 4
LINDA MARTIN		403	50,000.00	45,005.42	Secured	General Unsecured	See Footnote 4
RANDALL S. MARTIN	PROV. TR GP-FBO RANDALL S MARTIN ROTH IRA	9011	80,000.00	70,599.78	Secured	General Unsecured	See Footnote 4
RICHARD & GRETA MARTIN LIVING TRUST 11-1-99		9435	81,464.13	81,258.21	Secured	General Unsecured	See Footnote 4
ROSE MARTIN		9320	30,192.50	25,667.50	Secured	General Unsecured	See Footnote 4
IRINA MARTINEAU AND NICOLE MARTINEAU		2486	50,250.00	46,125.00	Secured/Unsecured	General Unsecured	See Footnote 4
GARY S MARTINEZ		2491	30,162.50	28,640.42	Secured	General Unsecured	See Footnote 4
ANTHONY MICHAEL MARTINOVICH		2375	50,270.83	47,706.97	Secured	General Unsecured	See Footnote 4



## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
MASBANJI TRUST		7255	99,000.00	86,306.00	Secured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUST FBO THOMAS MASON #T2176814		7881	86,543.71	83,868.07	Secured	General Unsecured	See Footnote 4
MARILYN L MASON	PROV. TR GP-FBO MARILYN L MASON IRA	1142	50,500.00	45,255.02	Secured	General Unsecured	See Footnote 4
MARILYN L MASON		1140	300,000.00		Secured		
MASONIC MEMORIAL TEMPLE INC		1141	100,000.00	389,184.75	Secured	General Unsecured	See Footnote 4
		1424	50,000.00		Secured	General Unsecured	See Footnote 4
CHARLIE L. MASSEY	PROV. TR GP-FBO CHARLIE MASSEY IRA	4869	35,200.00	35,200.00	Secured	General Unsecured	See Footnote 4
JAMES & GERALDINE MASSON		2350	30,750.00	26,013.33	Secured/Unsecured	General Unsecured	See Footnote 4
PROVIDENT TRUST GROUP FBO JAMES H MASSON IRA		2351	54,682.75	42,554.84	Secured/Unsecured	General Unsecured	See Footnote 4
MATA CBL INVESTMENTS LLC		4662	38,961.81	34,538.20	Secured/Unsecured	General Unsecured	See Footnote 4
NORA L HARTQUIST TTEE	THE TR OF ANTONY F MATARESE	490	200,000.00	195,000.02	Secured	General Unsecured	See Footnote 4
CHRISTINE MATER	MAINSTAR-FBO CHRISTINE MATER	277	145,168.09	136,574.46	Secured	General Unsecured	See Footnote 4
GAYLE & CHRISTOPHER MATHE		1843	25,000.00	24,258.33	Secured	General Unsecured	See Footnote 4
DAVID H & JANET M MATOESIAN		2166	50,000.00	41,716.67	Secured	General Unsecured	See Footnote 4
ADRIANNE S MATTE TRUST		2462	210,499.99	196,194.46	Secured	General Unsecured	See Footnote 4
		3620	100,000.00		Secured/Unsecured		
		3621	109,750.00		Secured/Unsecured		
JAMES W MATTHEW		3622	100,000.00	95,275.00	Secured/Unsecured	General Unsecured	See Footnote 4
SUNWEST TRUST AS CUST FOR DORIS B. MATTHEWS IRA		9417	100,000.00	83,983.33	Secured	General Unsecured	See Footnote 4
DENNIS W & DIANE L MATTIS		3218	50,000.00	48,916.67	Secured	General Unsecured	See Footnote 4

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Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
ROBERT F & BARBARA A MATTOX		2727	310,000.00	292,208.33	Secured	General Unsecured	See Footnote 4
JOHN B MATZ REVOCABLE LIVING TRUST 5TH DAY OF AUGUST 2016		2591	80,400.00	65,904.96	Secured/Unsecured	General Unsecured	See Footnote 4
PROVIDENT TRUST GROUP LLC FBO EVAN D MAUST IRA		1443	50,000.00	37,325.00	Secured	General Unsecured	See Footnote 4
JOHN E MAY		1950	100,000.00	85,800.00	Secured	General Unsecured	See Footnote 4
KARA H MAY		6036	300,000.00	282,999.99	Secured	General Unsecured	See Footnote 4
PROV. TR GP-FBO GARY E MAY IRA		5970 6043	64,571.25 57,285.00	103,900.06	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
ALAN K MAYEDA		1652	300,000.00	142,491.67	Secured	General Unsecured	See Footnote 4
DAVID MASAO MAYEDA		1749	1,200,000.00	591,300.00	Secured	General Unsecured	See Footnote 4
EMILY MAYER		3668	50,000.00	49,277.79	Secured	General Unsecured	See Footnote 4
BRIAN MAYFIELD		7251	25,156.25	23,552.08	Secured/Unsecured	General Unsecured	See Footnote 4
BURTON M & MARILYN M MAYFIELD		7249 7250	92,536.66 73,000.00	150,600.99	Secured/Unsecured Secured	General Unsecured	See Footnote 4
BURTON W MAYFIELD		7248	50,333.33	38,922.32	Secured/Unsecured	General Unsecured	See Footnote 4
GREGORY N & KATHLEEN M MAYNER		4582 4832	51,250.00 51,250.00	93,958.33	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
GEORGE G MAZMANIAN		2509	25,000.00	22,300.29	Secured	General Unsecured	See Footnote 4
ROSE DESESA MAZMANIAN		3672	25,000.00	22,300.29	Secured/Unsecured	General Unsecured	See Footnote 4
ANTHONY R MAZZOCCO		8303 8304	50,333.33 50,291.67	83,859.66	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
EDWARD P MAZZOLINI & CLARICE MAZZOLINI TRUST		1011 4054	50,000.00 50,000.00	48,279.15	Secured Secured	General Unsecured	See Footnote 4

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Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
CHRISTY MCAFFEE		3606	30,000.00	28,414.17	Secured	General Unsecured	See Footnote 4
DIXIE L & JAMES E MCALLISTER		5211 5212	352,916.66 252,083.32	575,138.90	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
THOMAS P MCANDREWS		7612	25,000.00	23,016.67	Secured	General Unsecured	See Footnote 4
DANIEL MCARTHUR AND DOROTHY MCARTHUR		6032	50,000.00	47,372.19	Secured	General Unsecured	See Footnote 4
WILLIAM MCCALLUM	WILLIAM & DEBRA ANN MCCALLUM	7504 7505	140,000.00 40,000.00	162,403.33	Secured Secured	General Unsecured	See Footnote 4
JOSEPH F MCCANN IRA	IRA SVCS TR CO-CFBO JOSEPH MCCANN IRA	5132	48,468.00	46,646.37	Secured	General Unsecured	See Footnote 4
LORRAINE J MCCANN	PROV. TR GP-FBO LORRAINE J MCCANN IRA	8795	244,022.14	202,772.22	Secured/Unsecured	General Unsecured	See Footnote 4
LORRAINE J MCCANN		8785 8796 8798	150,875.00 201,166.66 151,000.00	469,128.47	Secured/Unsecured Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
MARY MCCANN		8919	40,000.00	39,750.00	Secured	General Unsecured	See Footnote 4
JAMES MCCAREY		8307	100,000.00	91,152.83	Secured	General Unsecured	See Footnote 4
CHRISTOPHER SHANE MCCARROLL		4441	50,000.00	46,954.15	Secured	General Unsecured	See Footnote 4
ALAN J MCCARTHY		6668	50,000.00	48,959.71	Secured	General Unsecured	See Footnote 4
MICHAEL G MCCARTNEY	PROV. TR GP-FBO MICHAEL MCCARTNEY IRA	1656	56,000.00	39,837.77	Secured	General Unsecured	See Footnote 4
JOHN MCCAULEY		2179	50,000.00	37,916.57	Secured	General Unsecured	See Footnote 4
SCOTT MCCAW		8630 8631	25,209.59 25,209.59	49,312.50	Secured Secured	General Unsecured	See Footnote 4
SCOTT MCCAW (THROUGH MAINSTAR TRUST IRA)	MAINSTAR-FBO SCOTT MCCAW	8228	75,628.77	74,531.25	Secured	General Unsecured	See Footnote 4
YING MCCAW		8241	25,209.59	24,531.25	Secured	General Unsecured	See Footnote 4

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GLENN II & CONSTANCE MCCLELLAN		7472 7674	70,000.00 40,000.00	93,959.97	Secured Secured	General Unsecured	See Footnote 4
PROV TR GP-FBO CONSTANCE MCCLELLAN ROTH		7470	30,050.00	-	Secured	General Unsecured	See Footnote 4
PROV TR GP FBO CONSTANCE MCCLELLAN IRA		7474 7675	329,650.00 25,500.00	339,948.91	Secured Secured	General Unsecured	See Footnote 4
DOUGLAS A MCCLINTIC		2843	50,000.00	49,465.27	Secured	General Unsecured	See Footnote 4
BRYAN MCCLOSKEY		5874	25,000.00	23,825.00	Secured	General Unsecured	See Footnote 4
JEFFREY MCCLURG	MAINSTAR-FBO JEFFREY MCCLURG	514	90,000.00	86,713.75	Secured	General Unsecured	See Footnote 4
THE MCCLUSKEY FAMILY TRUST		5204	100,000.00	45,966.67	Admin/Secured	General Unsecured	See Footnote 4
DONALD MCCOMSEY		8910	30,000.00	29,716.67	Secured	General Unsecured	See Footnote 4
JAMES M MCCONNELL		3135 3136	100,500.00 150,750.00	213,041.57	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
MCCONNELL CHARITABLE REMANIDER TRUST		3092	302,250.00	260,500.00	Secured	General Unsecured	See Footnote 4
RAYFORD E MCCORMICK		8536	75,000.00	73,447.92	Secured	General Unsecured	See Footnote 4
JENNIFER B MCCracken		5456 5457 5458	75,000.00 25,000.00 30,000.00	122,801.78	Secured Secured Secured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUST FBO KIM MCCREADY		3699	49,500.00	49,199.22	Secured	General Unsecured	See Footnote 4
GEORGIA MCCREERY AND ANDREW LAMOND		7563	300,000.00	284,875.00	Secured	General Unsecured	See Footnote 4
PROVIDENT TG, FBO MARK J. MCDERMOTT IRA		6797	24,250.00	20,700.09	Secured	General Unsecured	See Footnote 4
JAMES K & MALLIE V MCDOLE		7304	26,000.00	25,731.33	Secured	General Unsecured	See Footnote 4
ALLAN M McDONALD		3571	50,000.00	48,625.02	Secured/Unsecured	General Unsecured	See Footnote 4

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Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
JAMES A MCDONALD		4560 4561 4592	50,000.00 75,000.00 100,000.00	210,279.80	Secured Secured Secured	General Unsecured	See Footnote 4
LARRY R MCDONALD		2180	200,000.00	172,888.84	Secured	General Unsecured	See Footnote 4
MAINSTAR TR CUST FBO BOBBY C MCDONALD #T2177755		8537	119,903.54	119,752.00	Secured	General Unsecured	See Footnote 4
SUNWEST TRUST AS CUSTODIAN FOR JAMES A MCDONALD ROTH IRA	SUNWEST TR JAMES A MCDONALD ROTH IRA	4591 9477 9480	500,000.00 50,000.00 500,000.00	456,559.69	Secured Secured Secured	General Unsecured	See Footnote 4
THE JAMES A MCDONALD REVOCABLE LIVING TRUST 2/7/05 AS AMENDED & RESTATED 8/1/10		4593	150,000.00	121,329.17	Secured	General Unsecured	See Footnote 4
ROBERT ANTHONY MCELROY & JACQUELINE PEACH MCELROY		1324	25,500.00	22,741.67	Secured	General Unsecured	See Footnote 4
ROBERT MCELROY	ROBERT & DOROTHY D MCELROY	976	317,476.65	288,661.19	Secured/Unsecured	General Unsecured	See Footnote 4
DORIS R MCELWEE TRUSTEE FOR THE DORIS MCELWEE LIVING TRUST		1796	25,000.00	24,284.70	Secured/Unsecured	General Unsecured	See Footnote 4
DAVID G MCFARLAND	PROV. TR GP- FBO DAVID G MCFARLAND IRA	4209	100,458.33	94,958.33	Secured	General Unsecured	See Footnote 4
JACQUELINE MCGOVERN		7635 7666	100,000.00 118,000.00	210,403.93	Secured Secured	General Unsecured	See Footnote 4
JAMES & CAROLYN MCGOWAN		1998	60,000.00	59,186.25	Secured	General Unsecured	See Footnote 4
MAINSTAR- FBO PAMELA MCGOWAN		6624 6625 6626 6627	26,312.50 50,333.33 24,207.50 100,583.33	176,291.48	Secured/Unsecured Secured/Unsecured Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4

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Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
MAINSTAR- FBO ROBERT MCGOWAN		6615	24,733.75		Secured/Unsecured		
		6618	25,208.33		Secured/Unsecured		
		6619	26,312.50		Secured/Unsecured		
		6620	40,233.33		Secured/Unsecured		
		6621	125,729.17	210,125.53	Secured/Unsecured	General Unsecured	See Footnote 4
ROBERT MCGOWAN		6597	50,375.00	43,550.00	Secured/Unsecured	General Unsecured	See Footnote 4
JAMES P MCGRANN		4297	60,300.00		Secured/Unsecured		
		4298	41,205.00		Secured/Unsecured		
		4299	29,145.00	108,882.64	Secured/Unsecured	General Unsecured	See Footnote 4
SHAWN MCGORY		3035	65,000.00	57,737.46	Secured	General Unsecured	See Footnote 4
RONALD A AND NANCY H MCINNES		3809	25,750.00	20,270.84	Secured/Unsecured	General Unsecured	See Footnote 4
DALE A MCINTIRE TRUST UAD 1/20/2011		2283	100,541.67	95,558.31	Secured	General Unsecured	See Footnote 4
PROV. TR GP-FBO EVELYN M MCKEE IRA		6741	80,574.25	76,539.36	Secured	General Unsecured	See Footnote 4
GORDON MCKENZIE	MAINSTAR-FBO GORDON R MCKENZIE	614	431,757.00	379,833.33	Secured/Priority	General Unsecured	See Footnote 4
LARRY H MCKINNEY		992	30,000.00	29,583.33	Secured	General Unsecured	See Footnote 4
ROBERT C MCKINNEY	PROV. TR GP-FBO ROBERT MCKINNEY IRA	222	78,163.00	67,588.36	Secured	General Unsecured	See Footnote 4
GARY L MCKINZIE REVOCABLE TRUST 7/24/2002		2432	150,750.00	131,033.33	Secured	General Unsecured	See Footnote 4
PAULINE MCKITRICK AND LAUREN D SHUMUMBAUGH		6699	100,541.67	95,431.92	Secured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUSTODIAN FBO JESSICA MCLAUGHLIN		3487	64,000.00	62,424.63	Secured	General Unsecured	See Footnote 4
THOMAS W MCLEMORE JR		1917 1918	200,000.00 25,000.00	211,423.98	Secured Secured	General Unsecured	See Footnote 4
ADA SUE MCMAHAN		4498	25,000.00	21,616.79	Secured	General Unsecured	See Footnote 4

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Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
WILLIAM R MCMAHON & SAND SUTER MCMAHON		7127	100,500.00	84,166.67	Secured	General Unsecured	See Footnote 4
PROVIDENT TRUST GROUP LLC FBO WILLIAM J MCMILLAN & JO-ANN P MCMILLAN REV TRUST		1888	30,000.00	25,266.67	Secured	General Unsecured	See Footnote 4
PROVIDENT TRUST GROUP LLC FBO WILLIAM J MCMILLAN IRA		1887	25,000.00	18,812.50	Secured	General Unsecured	See Footnote 4
GAYLE H MCMILLIAN		3338	30,000.00	28,053.33	Secured/Unsecured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUSTODIAN FBO GERALD MCMULLIN		2124 2125	50,000.00 150,000.00		Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
MAINSTAR TRUST CUSTODIAN FBO KELLY MCMULLIN		2126	100,000.00	96,830.55	Secured/Unsecured	General Unsecured	See Footnote 4
ROBERT MCNEELY AND SHEILA S MCNEELY JOINT		2472 2473	50,250.00 50,250.00	91,291.67	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
WILLIAM ROBERT MCNINCH		7917	25,000.00	20,437.50	Secured	General Unsecured	See Footnote 4
MAINSTAR FBO DANIEL E MCPADDEN JR IRA #T2177855	MAINSTAR-FBO DANIEL MCPADDEN JR	99	167,892.29	164,301.26	Secured	General Unsecured	See Footnote 4
EDWARD MCPHERSON		1801	50,000.00	47,210.45	Secured	General Unsecured	See Footnote 4
TINA COLLEEN MCQUISTON		4511	100,000.00	78,833.42	Secured	General Unsecured	See Footnote 4
PAUL M MCSHANE JR		8460	50,000.00	49,305.57	Secured	General Unsecured	See Footnote 4
KRISTA MCVEY		5375 5376 9788	45,000.00 25,000.00 45,000.00		Secured Secured Priority/Unsecured	General Unsecured	See Footnote 4
JOHN MEDEIROS TRUST		1089 8867 8868 8869	200,000.00 100,000.00 100,000.00 100,000.00		Secured Secured Secured Secured	General Unsecured	See Footnote 4

## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
ROSA M MEDINA		5084 5085 5086	50,000.00 50,000.00 25,000.00	118,467.33	Secured Secured Secured	General Unsecured	See Footnote 4
NAVIN & NEELAM K MEHTA		2701 6444	100,000.00 100,000.00	92,698.61	Secured Secured	General Unsecured	See Footnote 4
NORM MEIER		7307	600,000.00	582,648.57	Secured	General Unsecured	See Footnote 4
MICHAEL MELDRUM	MAINSTAR-FBO MICHAEL J MELDRUM	1337	54,500.00	53,938.34	Secured	General Unsecured	See Footnote 4
GEORGE & LYNNE MELLECKER		617	76,563.00	70,364.58	Secured	General Unsecured	See Footnote 4
CHARLES E MELLOR		4127	60,000.00	55,491.67	Secured	General Unsecured	See Footnote 4
ALLISON MELOGRANO & ANTHONY C MELOGRANO		6217	50,320.84	48,599.99	Secured	General Unsecured	See Footnote 4
ANTHONY MELOGRANO & GAIL MELOGRANO		7838	50,366.67	48,561.15	Secured	General Unsecured	See Footnote 4
JANICE MELOSKY AND THOMAS TUCKER		8819	301,650.00	295,150.00	Secured	General Unsecured	See Footnote 4
DONNA MELOY		7356 7357 7358	55,825.00 106,000.00 37,555.00	163,791.47	Secured/Unsecured Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
PROVIDENT TR GRP-FBO DONNA MELOY		8012 8013	110,825.00 13,097.50	107,947.00	Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
RICHARD A. MENDONCA, JR., TRUSTEE		6948	110,000.00	109,725.00	Secured	General Unsecured	See Footnote 4
RICHARD A. MENDONCA, TRUSTEE		8016	90,000.00	88,612.50	Secured	General Unsecured	See Footnote 4
CHING-YU MENG		4165	50,000.00	47,532.61	Secured	General Unsecured	See Footnote 4
BENJAMIN MENOLD CUSTODIAN FOR MORGAN R MENOLD - UTMA CA		461	40,489.99	40,000.00	Secured/Unsecured	General Unsecured	See Footnote 4
RONALD H MERCIER		1189	33,550.00	20,965.50	Secured/Unsecured	General Unsecured	See Footnote 4



## Exhibit A

Filed Creditor Name	Modified Creditor Name (if applicable) (See Footnote 1)	Claim Number	Filed Amount (See Footnote 2)	Modified Amount (See Footnote 3)	Filed Status	Modified Status	Reason for Modification
PROVIDENT TRUST GROUP FBO JOHN P MERKER IRA		8492 8493 8494	248,255.00 50,499.00 155,659.00	363,375.10	Secured/Unsecured Secured/Unsecured Secured/Unsecured	General Unsecured	See Footnote 4
CINDY AND ROBERT MERRILL		2392	25,927.80	11,507.69	Secured/Unsecured	General Unsecured	See Footnote 4
DOROTHY MERRILL	MAINSTAR-FBO DOROTHY MERRILL	1495	50,000.00	47,299.70	Secured	General Unsecured	See Footnote 4
RICHARD F MERRION LT JAMES KING III & KATHY K MERRITT		7244	25,000.00	23,762.50	Secured	General Unsecured	See Footnote 4
JAMES MERRITT III ROTH	HORIZON TR CO-FBO JAMES MERRITT III ROTH	6914	90,000.00	54,968.40	Secured	General Unsecured	See Footnote 4
PROV TR GRP LLC FBO KATHERINE M MESSENGER IRA		6913	52,450.08	32,577.81	Secured	General Unsecured	See Footnote 4
ALVA WENDELL MESSIMER		6708	317,700.00	302,123.87	Secured	General Unsecured	See Footnote 4
MICHAEL R MEYER		708	25,000.00	24,774.66	Secured	General Unsecured	See Footnote 4
PAULA MEYERSON		3277	25,500.00	19,812.45	Secured/Unsecured	General Unsecured	See Footnote 4
		1447	51,000.00	49,500.00	Secured	General Unsecured	See Footnote 4

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC, *et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Hrg. Date: May 27, 2020 at 10:30 a.m. (ET)

Obj. Deadline: May 6, 2020 at 4:00 p.m. (ET)

**NOTICE OF TWENTY-FIFTH (25TH) OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE  
BANKRUPTCY CODE, BANKRUPTCY RULE 3007,  
AND LOCAL RULES 3007-1 AND 3007-2**

**PARTIES RECEIVING THIS NOTICE SHOULD LOCATE  
THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED  
ON EXHIBIT A TO THE PROPOSED ORDER**

**BY THIS OBJECTION, THE TRUST IS NOT MODIFYING THE AMOUNT OF ANY  
NET NOTE CLAIM OR NET UNIT CLAIM FOR ANY DISPUTED CLAIM  
HEREUNDER FROM THE AMOUNTS PREVIOUSLY CALCULATED BY THE  
DEBTORS AND SET FORTH ON THE APPLICABLE BALLOT, WHICH AMOUNT  
EACH CLAIMANT SUBJECT TO THIS OBJECTION HAS NOT DISPUTED.**

TO: (I) THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) THE TRUST AND ITS COUNSEL; (III) ANY PERSON FILING A SPECIFIC REQUEST FOR NOTICES AND PAPERS ON AND AFTER THE EFFECTIVE DATE; AND (IV) CLAIMANTS WHOSE DISPUTED CLAIMS ARE SUBJECT TO THE OBJECTION<sup>2</sup>

**PLEASE TAKE NOTICE** that the Woodbridge Liquidation Trust (the “Trust”) has filed the attached *Twenty-Fifth (25th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”).<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that any responses (each, a “Response”) to the relief requested in the Objection must be filed on or before **May 6, 2020, at 4:00 p.m. (ET)**

<sup>1</sup> 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.

<sup>2</sup> In accordance with Local Rule 3007-2, the Trust has served the parties that, as of the filing of this Notice, have requested notices on and after the Effective Date, with this Notice and the Exhibits to the Objection.

<sup>3</sup> Capitalized terms used but not otherwise defined in this Notice shall have the meanings ascribed to such terms in the Objection.

(the “Response Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. At the same time, any party submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Trust so as to be received on or before the Response Deadline.

**PLEASE TAKE FURTHER NOTICE** that any Response must contain, at a minimum, the following:

- a. a caption setting forth the name of the Court, the above-referenced case number and the title of the Objection to which the Response is directed;
- b. the name of the Respondent and a description of the basis for the amount and classification asserted in the Disputed Claim, if applicable;
- c. a concise statement setting forth the reasons why the particular Disputed Claim should not be disallowed, reclassified or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at any hearing thereon;
- d. all documentation or other evidence of the particular Disputed Claim or asserted amount and classification thereof, to the extent not already included with the proof of claim previously filed, upon which the Respondent will rely in opposing the Objection at any hearing thereon; and
- e. the name, address, telephone number and email address of the person(s) (who may be the Respondent or a legal representative thereof) (i) possessing ultimate authority to reconcile, settle or otherwise resolve the Disputed Claim on behalf of the Respondent and (ii) to whom the Trust should serve any reply to the Response.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING (THE “HEARING”) ON THE OBJECTION WILL BE HELD ON MAY 27, 2020, AT 10:30 A.M. (ET) BEFORE THE HONORABLE BRENDAN L. SHANNON, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE TRUST WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.**

**PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE TRUST, TO THE ATTENTION OF JONATHAN M. WEISS. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIMS OR THE OBJECTION.**

Dated: April 22, 2020  
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)  
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-and-

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*Counsel to Woodbridge Liquidation Trust*