

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

STIPULATION TO DISALLOW CLAIM 7039
OF CLAIMANT CANDI P. FELLER

This Stipulation is entered into by and between, on the one hand, Candi P. Feller (the “Claimant”) and, on the other hand, the Woodbridge Liquidation Trust (the “Liquidation Trust”), and together with the Claimant, the “Parties”).

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 and the *Disclosure Statement for the First Amended*

¹ The last four digits of Woodbridge Group of Companies, LLC’s federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ noticing and claims agent at www.gardencitygroup.com/cases/WGC.

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Plan.

Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors [Docket No. 2398] (as it may be amended, supplemented, or modified from time to time, the “Disclosure Statement”);

C. **WHEREAS**, on August 22, 2018, the Bankruptcy Court entered an order approving the Disclosure Statement and authorizing the Debtors to solicit votes to accept the Plan [Docket No. 2396];

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

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

F. **WHEREAS**, on June 7, 2018, Claimant filed claim number 7039 (“Claim 7039”) in the amount of \$126,000.00 (as listed on the Debtors’ claims register).

H. **WHEREAS** Claim 7039 is not based on a direct investment in the Debtors, but is based on Claimant’s investment in one of more of the Ironbridge funds, none of which is a debtor entity or related entity, and each of which itself filed a claim against the Debtors based on its investment of the funds of its many clients, including Claimant;

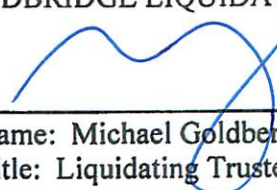
I. **WHEREAS** the claims of the Ironbridge funds have, as a result of the Trustee’s motion therefor, been converted into claims of the individual Ironbridge investors against the Debtors and thus, Claimant now holds Class A Shares in the Woodbridge Liquidation Trust for the identical underlying investment, and is not entitled to a duplicate recovery;

NOW THEREFORE, the Parties agree as follows:

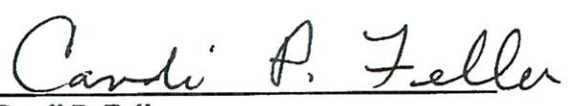
1. Recitals A through I, inclusive, are true and correct and are an integral part of this Stipulation.
2. Claim No. 7039 shall be disallowed and expunged from the Debtors' claims register.
3. The Bankruptcy Court shall have exclusive jurisdiction and power to resolve any dispute arising out of, relating to, or deriving from this Stipulation and has the jurisdiction and power to enter a final order thereon.

Dated: 12/22/2020 2020

WOODBIDGE LIQUIDATION TRUST

By: 
Name: Michael Goldberg
Title: Liquidating Trustee

Dated: 1/16, 2020

By: 
Candi P. Feller