

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

In re:

Chapter 11

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

Case No. 17-12560 (KJC)

Debtors.

**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE OF SHUTTS & BOWEN LLP**

Shutts & Bowen LLP (“Shutts”), hereby submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, and respectfully states as follows:

1. On December 4, 2017, Woodbridge Group of Companies, LLC, *et al.* (collectively, the “Debtors”) filed their respective voluntary petitions under Chapter 11 of title 11, United States Code.

2. Shutts is legal counsel to (i) Robert M. Rowe, (ii) Leann M. Rowe, (iii) Robert E. Rowe, (iv) Norma J. Rowe, (v) David Cox, and (vi) Margaret Cox (collectively, the “Noteholders”). Shutts has been retained as counsel by the Noteholders for representation relating to the Debtors and their bankruptcy cases.

3. Pursuant to Rule 2019, the attached Exhibit “A” lists each of the Noteholders’ names and addresses and the nature and amount of their respective claims or interests in these bankruptcy cases as of February 1, 2018.¹

4. Shutts does not own or have a claim against or interest in the Debtors. Pursuant to Bankruptcy Rule 2019(d), Shutts reserves the right to amend, revise and/or supplement this Statement.

¹ Nothing herein should be construed as an admission or factual representation by the Noteholders or otherwise limit, waive or otherwise affect the Noteholders’ ability to assert or file new or additional claims against the Debtors as such claims may be determined during the course of the bankruptcy cases.

5. The undersigned hereby verifies that the foregoing is true and accurate as of the date hereof to the best of knowledge and belief.

Dated: February 2, 2018.

/s/ Ryan C. Reinert

RYAN C. REINERT

Florida Bar No. 81989

SHUTTS & BOWEN LLP

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Attorneys for Noteholders

Exhibit "A"

| Creditor | Address | Amount of Claim² |
|-------------------------------------|--|------------------------------------|
| Robert M. Rowe and Leann M. Rowe | 621 64th Ave. St. Pete Beach, FL 33706 | \$500,000.00 (Note) |
| Robert E. Rowe and Norma J. Rowe | 9055 Scottsboro Hwy. Scottsboro, AL 35769 | \$2,000,000.00 (Notes) |
| David Cox and Margaret Cox | 458 Babe Wright Rd. Grant, AL 35747 | \$130,000.00 (Notes) |

² In addition to such other and further claims as may be determined during the course of the bankruptcy cases.