IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal

Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the undersigned counsel enter their

appearance as counsel Tintarella, LLC ("Tintarella") and request that all notices and other papers

filed or served in the above-captioned cases be served upon the following:

Genise Reiter, Esq. Paul T. Dye, Esq. REITER DYE & BRENNAN, LLP 10990 Wilshire Blvd. Suite 940 Los Angeles, California 90024 Telephone: (424) 369-4470 Email: grr@rdbattorneys.com ptd@rdbattorneys.com

-and-

L. Katherine Good (No. 5101) Stephen B. Gerald (No. 5857) WHITEFORD, TAYLOR & PRESTON LLC² The Renaissance Centre 405 North King Street, Suite 500 Wilmington, Delaware 19801 Telephone: (302) 353-4144 Facsimile: (302) 661-7950 Email: kgood@wtplaw.com sgerald@wtplaw.com

-and-

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 14225 Ventura Boulevard #100, Sherman Oaks, California 92423. 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 <u>www.gardencitygroup.com/cases/WGC</u>, or by contacting the undersigned counsel for the Debtors.

² Whiteford, Taylor & Preston LLC operates as Whiteford Taylor & Preston L.L.P. in jurisdictions outside of Delaware.

John D. Monte, Esq. 15303 Ventura Boulevard, Floor 9 Sherman Oaks, California 91403 Telephone: (323) 876-9918 Facsimile: (323) 978-4842 Email: johnmontelaw@gmail.com Christopher A. Jones, Esq. WHITEFORD TAYLOR & PRESTON L.L.P. 3190 Fairview Park Drive, Suite 800 Falls Church, Virginia 22042-4510 Telephone: (703) 280 9260 Facsimile: (703) 280-9139 Email: cajones@wtplaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of Tintarella including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the "<u>District Court</u>"), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Tintarella is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until Tintarella expressly states otherwise, Tintarella does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: February 2, 2018 Wilmington, Delaware Respectfully submitted,

/s/ Stephen B. Gerald L. Katherine Good (No. 5101) Stephen B. Gerald (No. 5857) WHITEFORD, TAYLOR & PRESTON LLC The Renaissance Centre 405 North King Street, Suite 500 Wilmington, Delaware 19801 Telephone: (302) 353-4144 Facsimile: (302) 661-7950 Email: kgood@wtplaw.com sgerald@wtplaw.com

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Counsel to Tintarella, LLC

CERTIFICATE OF SERVICE

I, Stephen B. Gerald, do hereby certify that on February 2, 2018, a copy of the foregoing *Notice of Appearance and Request for Notices* was served on the parties on the attached service list by first-class mail.

<u>/s/ Stephen B. Gerald</u> Stephen B. Gerald (No. 5857)

WOODBRIDGE GROUP OF COMPANIES, LLC, et al. 17-12560 (KJC) <u>SERVICE LIST</u>

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