

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

In re:

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

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, *et al.*,

Plaintiff,

vs.

BANK OF AMERICA CORPORATION,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case No. 19-51031 (BLS)

STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT

Michael Goldberg, in his capacity as the Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of Woodbridge Group of Companies, LLC, *et al.*, (the “Plaintiff”) and Bank of America Corporation (the “Defendant” together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead in response to the *Complaint for Avoidance and Recovery of Preferential*

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.

and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548 & 550 [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including February 3, 2020.

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

<p>Dated: January 3, 2020</p> <p>PACHULSKI STANG ZIEHL YOUNG & JONES LLP</p> <p><u>/s/ Colin R. Robinson</u></p> <p>Andrew W. Caine (CA Bar No. 110345) Bradford J. Sandler (DE Bar No. 4142) Colin R. Robinson (DE Bar no. 5524) 919 North Market Street, 17th Floor P.O. Box 8705 Wilmington, DE 19899 (Courier 19801) Phone: (302) 652-4100 Email: acaine@pszjlaw.com bsandler@pszjlaw.com crobinson@pszjlaw.com</p> <p><i>Counsel for Michael Goldberg, in his capacity as the Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of Woodbridge Group of Companies, LLC, et al.</i></p>	<p>Dated: January 3, 2020</p> <p>POTTER ANDERSON CORROON LLP</p> <p><u>/s/ R. Stephen McNeill</u></p> <p>R. Stephen McNeill (DE Bar No. 5210) Hercules Plaza 1313 N. Market Street, 6th Floor Wilmington, Delaware 19801 Phone: (302) 984-6000 Email: rmcneill@potteranderson.com</p> <p><i>-and-</i></p> <p>MCGUIREWOODS LLP Gregory E. Dapper Tower Two-Sixty 260 Forbes Avenue, Suite 1800 Pittsburgh, PA 15222-3142 Phone: 412 667 7984 Email: gdapper@mcguirewoods.com</p> <p><i>Counsel for Bank of America Corporation</i></p>
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