

**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)

WOODBIDGE WIND-DOWN ENTITY, LLC  
and WB 714 OAKHURST, LLC,

Plaintiffs,

v.

MONSOON BLOCKCHAIN STORAGE, INC.,

Defendant.

Adv. Proc. No. 19-50102 (BLS)

**Hearing Date: August 27, 2020 at 11:00 am (ET)**

**Obj. Deadline: August 25, 2020 at 4:00 pm (ET)**

**Re: Adv. D.I. 49 and 51**

**NOTICE OF MOTION OF BAYARD, P.A. AND PROCOPIO, CORY, HARGREAVES &  
SAVITCH, LLP FOR LEAVE TO WITHDRAW AS COUNSEL TO  
DEFENDANT MONSOON BLOCKCHAIN STORAGE, INC.**

PLEASE TAKE NOTICE that on August 13, 2020, Bayard, P.A. (“Bayard”) and Procopio, Cory, Hargreaves & Savitch, LLP (“Procopio”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the **Motion of Bayard, P.A. and Procopio, Cory, Hargreaves & Savitch, LLP for Leave to Withdraw as Counsel to Defendant Monsoon Blockchain Storage, Inc.** [Adv. D.I. 49] (the “Motion”), a copy of which is being served on you with this notice.

<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.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief sought in the Motion will be held on **August 27, 2020 at 11:00 a.m. (ET)** before the Honorable Brendan L. Shannon, United States Bankruptcy Judge, at the Court, 824 Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the entry of an order approving the Motion, must be filed on or before **August 25, 2020 at 4:00 p.m. (ET)** (the "Objection Deadline") with the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response upon the undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO PROPERLY FILE AND SERVE A RESPONSE ON OR BEFORE THE OBJECTION DEADLINE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

*Remainder of Page Left Intentionally Blank*

Dated: August 14, 2020  
Wilmington, Delaware

BAYARD, P.A.

/s/ Evan T. Miller

Evan T. Miller (No. 5364)  
Sophie E. Macon (No. 6562)  
600 N. King Street, Suite 400  
Wilmington, DE 19801  
Telephone: (302) 655-5000  
Facsimile: (302) 658-6395  
E-mail:emiller@bayardlaw.com  
smacon@bayardlaw.com

- and -

PROCOPIO

William A. Smelko  
525 B Street, Suite 2200  
San Diego, CA 92101  
Telephone: (619) 525-3834  
Facsimile: (619) 744-5447  
Email: bill.smelko@procopio.com

*Counsel for Defendant*