IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

WOODBRIDGE GROUP OF COMPANIES LLC, *et al.*,¹ Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Debtors.

NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Drinker Biddle & Reath LLP, counsel for the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates (the "<u>Ad Hoc Committee</u>"), hereby enters its appearance pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure; and such counsel hereby requests that copies of all notices and pleadings given or filed in these cases be given and served upon the following:

upon die fonowing.

Steven K. Kortanek, Esq. Patrick A. Jackson, Esq. Joseph N. Argentina, Jr., Esq. DRINKER BIDDLE & REATH LLP 222 Delaware Avenue, Suite 1410 Wilmington, Delaware 19801 Telephone: (302) 467-4200 Facsimile: (302) 467-4201 steven.kortanek@dbr.com patrick.jackson@dbr.com joseph.argentina@dbr.com James H. Millar, Esq. DRINKER BIDDLE & REATH LLP 1177 Avenue of the Americas, 41st Floor New York, New York 10036-2714 Telephone: (212) 248-3140 Facsimile: (212) 248-3141 james.millar@dbr.com

James G. Lundy, Esq. DRINKER BIDDLE & REATH LLP 191 N. Wacker Dr., Ste. 3700 Chicago, Illinois 60606-1698 Telephone: (312) 569-1000 Facsimile: (312) 569-3000 james.lundy@dbr.com

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 91423. A complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses may be obtained on the website of the Debtors' proposed noticing and claims agent at www.gardencitygroup.com/cases/WGC.

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PLEASE TAKE FURTHER NOTICE that, the foregoing demand includes not only the notices and papers referred to in the rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, plan and disclosure statement, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, courier service, hand-delivery, electronic mail, internet, or otherwise filed or made with regards to the referenced cases and proceeds therein.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Entry of Appearance* nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the Ad Hoc Committee's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the Ad Hoc Committee is or may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are reserved.

PLEASE TAKE FURTHER NOTICE that the aforementioned attorneys further request that they be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in the above-captioned cases.

Dated: December 11, 2017 Wilmington, Delaware

DRINKER BIDDLE & REATH LLP

/s/ Patrick A. Jackson

Steven K. Kortanek (Del. Bar No. 3106) Patrick A. Jackson (Del. Bar No. 4976) Joseph N. Argentina, Jr. (Del. Bar No. 5453) 222 Delaware Avenue, Suite 1410 Wilmington, Delaware 19801 Telephone: (302) 467-4200 Facsimile: (302) 467-4201 steven.kortanek@dbr.com patrick.jackson@dbr.com joseph.argentina@dbr.com

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Counsel to the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates