

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

In re:	:	Chapter 11
	:	
WOODBRIIDGE GROUP OF COMPANIES LLC, <i>et al.</i> , ¹	:	Case No. 17-12560 (KJC)
	:	
	:	(Jointly Administered)
	:	
Debtors.	:	

**VERIFIED STATEMENT OF DRINKER BIDDLE & REATH LLP PURSUANT
TO RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR THE AD HOC COMMITTEE OF HOLDERS OF PROMISSORY NOTES OF
WOODBRIIDGE MORTGAGE INVESTMENT FUND ENTITIES AND AFFILIATES**

Drinker Biddle & Reath LLP (“DBR”) hereby submits this verified statement (the “Verified Statement”), pursuant to rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in connection with DBR’s representation, in the chapter 11 cases (“Chapter 11 Cases”) of the above-captioned affiliated debtors-in-possession (collectively, the “Debtors”), of the Ad Hoc Committee of Holders of Promissory Notes of Woodbridge Mortgage Investment Fund Entities and Affiliates (the “Ad Hoc Committee”).

Verified Statement

1. The Ad Hoc Committee was formed as of December 11, 2017, and has elected to engage Dundon Advisers LLC and DBR to represent the interests of the Ad Hoc Committee in connection with these Chapter 11 Cases. Pursuant to Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names, addresses, and the amount of each disclosable economic interest held by each of the Ad Hoc Committee members. *See* Fed. R. Bankr. P. 2019(c).

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.

2. None of the Ad Hoc Committee members represents or purports to represent any other entities in connection with the Debtors' Chapter 11 Cases.

3. Nothing contained in this Verified Statement or **Exhibit A** shall be construed as a limitation upon, or waiver of, any rights of any of the Ad Hoc Committee members to assert, file, and/or amend their claims in accordance with applicable law and any orders entered in these Chapter 11 Cases

4. Dundon Advisers LLC and DBR do not hold any claims against, or interests in, the Debtors.

5. DBR will amend or supplement this Verified Statement to identify any additional noteholders who join the Ad Hoc Committee, or as may otherwise be necessary to comply with Bankruptcy Rule 2019.

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Dated: December 11, 2017
Wilmington, Delaware

DRINKER BIDDLE & REATH LLP

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

EXHIBIT A

<u>NAME</u>	<u>ADDRESS</u>	<u>NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTERESTS¹</u>
Ali Heidari	To be provided	\$150,000
Anne Perella	To be provided	\$350,000
Kimberly and John Harris	To be provided	\$100,000
Hellen Harris	To be provided	\$100,000

¹ To the best of DBR's knowledge, the information included herein is accurate as of the date hereof. The debt amounts set forth herein include only outstanding principal amounts and do not include accrued or unpaid interest or other amounts that may be owing under the applicable debt documents.