

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

In re:

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

Debtors.

Chapter 11

Case No. 17-12560 (KJC)

(Jointly Administered)

Ref. Docket No. 692

SUPPLEMENTAL DECLARATION OF PAUL HUYGENS IN SUPPORT OF THE APPLICATION FOR ENTRY OF AN ORDER, PURSUANT TO SECTION 327(a) OF THE BANKRUPTCY CODE, AUTHORIZING THE EMPLOYMENT AND RETENTION OF PROVINCE, INC. AS OPERATIONAL AND FINANCIAL ADVISORS TO THE DEBTORS *NUNC PRO TUNC* TO FEBRUARY 1, 2018

I, Paul Huygens, hereby declare the following is true to the best of my knowledge, information, and belief:

1. I am a principal with the firm of Province, Inc. (“Province”), which is an operational and financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 330, Henderson, Nevada 89074. Province also has offices in the Los Angeles and Miami metro areas. I am duly authorized to make this declaration (the “Supplemental Declaration”) on behalf of Province.

2. I submit this Supplemental Declaration in support of the *Application for Entry of an Order, Pursuant to Section 327(a) of the Bankruptcy Code, Authorizing the Employment and Retention of Province, Inc. as Operational and Financial Advisors to the Debtors Nunc Pro Tunc*

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 14140 Ventura Boulevard #302, Sherman Oaks, California 91423. 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 www.gardencitygroup.com/cases/WGC, or by contacting the undersigned counsel for the Debtors.

to February 1, 2018 [D.I. 692] (the “Application”).² Except as otherwise noted,³ I have personal knowledge of the matters set forth herein and, if called as a witness, I could and would testify thereto.

3. In connection with the Debtors’ proposed retention of Province, the United States Trustee has requested that I make the following disclosures:

- a. The Debtors previously retained Province to provide expert valuation services solely with respect to obtaining post-petition financing. Any additional services to be provided by Province were conditioned upon further court approval pursuant to a separate retention application. *Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtors to Retain Expert Consultant Nunc Pro Tunc as of December 18, 2017* [D.I. 360] (the “Valuation Services Order”). Consistent with the Valuation Services Order, Province now seeks retention as the operational and financial advisor to the Debtors pursuant to sections 327(a) and 328(a) of the Bankruptcy Code.
- b. The Debtors’ current Chief Executive Officer, Frederick Chin, was previously employed by Province as a Senior Director from May of 2016 to January 28, 2018. Mr. Chin previously disclosed his former employment in the *Declaration of Frederick Chin in Support of Debtors’ Motion under 105(a) and 363(b) for Authorization to Employ and Retain*

² Capitalized terms used herein, but not otherwise defined, have the meanings given to them in the Application.

³ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at Province and are based on information provided by them.

*Frederick Chin as Chief Executive Officer Nunc Pro Tunc to January 29,
2018 [D.I. 564].*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
is true and correct.

Dated: March 22, 2018

/s/ Paul Huygens

Paul Huygens
Principal
Province, Inc.