

**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

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' DISCOVERY
DEMANDS DIRECTED TO JOSEPH E. SARACHEK, ESQ.**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 26, 30 and 34, made applicable herein pursuant to Fed. R. Bankr. P. 7026, 7030, 7034, and 9014, the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the "Committee") shall take discovery of Joseph E. Sarachek, Esq. in connection with the *Motion and Order for Admission Pro Hac Vice*, filed on March 28, 2018 [Docket No. 851], as set forth herein.

A. DEPOSITION NOTICE

The Committee will take the deposition upon oral examination of Joseph E. Sarachek, Esq., commencing at **10:00 a.m. Eastern time on April 4, 2018**. The deposition will take place at the offices of Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, New York, New York 10017. The deposition by oral examination will be taken before a notary public or an officer authorized by law to administer oaths upon oral examination, and will be recorded by a

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. The 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 noticing and claims agent at www.gardencitygroup.com/cases/WGC.

certified court reporter by stenographic method through the use of real-time or otherwise, and/or by audio or video recording.

B. DOCUMENT REQUESTS

The Committee requests that Joseph E. Sarachek, Esq. produce legible copies of the documents requested herein no later than **10:00 a.m. Eastern time on April 4, 2018**, or on such other date as may be agreed to by counsel, to **Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017, Attn: John A. Morris.**

INSTRUCTIONS AND DEFINITIONS

- A. The use of the singular form of any word includes the plural, and vice versa.
- B. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- C. You are required to produce the full and complete originals, or copies if the originals are unavailable, of each Document responsive to the categories below along with all non-identical copies and drafts in its or their entirety, without abbreviations, excerpts, or redactions. Copies may be produced in lieu of originals if the entirety (front and back where appropriate) of the Document is reproduced and the Responding Party or its authorized agent or representative states by declaration or affidavit under penalty of perjury that the copies provided are true, correct, complete, and an accurate duplication of the original(s).
- D. If You withhold or redact a portion of any document under a claim of privilege or other protection, each such Document must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged Documents responsive to this Request for Production, and which privilege log shall identify the following information:

1. The date of the Document;
 2. The type of Document (*e.g.*, letter, memorandum, report, etc.);
 3. The general subject matter of the Document;
 4. The name, address, telephone number and title of the author(s) of the Document;
 5. The name, address, telephone number and title of each recipient and/or addressee of the Document;
 6. The number of pages in the Document;
 7. The Document control number, if any;
 8. The present location(s) of the Document and the name, address and telephone number of the person(s) who has (have) possession of the Document;
 9. A general description of the subject matter of the Document or the portion redacted without disclosing the asserted privileged or protected communication;
 10. The specific privilege(s) or protection(s) that You contend applies.
- E. Unless otherwise indicated, the Documents requested include all documents that have come into existence or been utilized, read, transcribed, copied, placed in or retrieved from any file between December 4, 2017 and the date of Your response.
- F. “All” shall be construed as “all,” “any,” and “each.”
- G. “Cases” means the above-captioned bankruptcy proceedings, which are jointly administered at Case No. 17-12560 (KJC).
- H. “Communications” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) and includes, without limitation, all written Communications of any nature, type or kind including, but not limited to, any Documents, telephone

conversations, discussions, meetings, facsimiles, e-mails, pagers, memoranda, and any other medium through which any information is conveyed or transmitted.

I. “Concerning” means relating to, referring to, describing, evidencing, or constituting.

J. “Debtors” means the above-captioned debtors and their affiliates listed in footnote 1 above.

K. “Document” is used herein in the broadest possible sense as specified in and interpreted under Rule 34 of the Federal Rules of Civil Procedure, and includes, without limitation, all originals and copies, duplicates, drafts, and recordings of any written, graphic or otherwise recorded matter, however produced, reproduced, or stored, and all “writings” as defined in Rule 1001 of the Federal Rules of Evidence, and all other tangible things by which human communication is transmitted or stored, meaning any kind of printed, recorded, graphic, or photographic matter, however printed, produced, reproduced, copies, reproductions, facsimiles, drafts and both sides thereof, including without limitation any kind of written, typewritten, graphic, photographic, printed, taped or recorded material whatsoever.

L. “Each” shall be construed as “all” and “each.”

M. “Motion” means the *Motion and Order for Admission Pro Hac Vice*, filed on March 28, 2018 [Docket No. 851].

N. “You,” “Your,” and “Yours” means and refers to Joseph E. Sarachek, Esq. and all persons and entities acting on behalf or for the benefit of Joseph E. Sarachek, Esq.

O. “Co-counsel” means any person, including any lawyer or firm, who either You or any of Your clients in the Cases have engaged to represent any clients in the Cases.

REQUESTS FOR PRODUCTION

Request No. 1:

All Documents and Communications Concerning the terms on which You are representing any client in connection with the Cases or the Debtors, including all retainer agreements, engagement letters, and other Documents that might or would entitle You or Your Co-counsel to any fee, award, payment, reimbursement, recompense or recovery in connection with the Cases.

Dated: March 30, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Bradford J. Sandler

Richard M. Pachulski (CA Bar No. 90073)
James I. Stang (CA Bar No. 94435)
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*Counsel for the Official Committee of Unsecured
Creditors*

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

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

CERTIFICATE OF SERVICE

I, Colin R. Robinson, hereby certify that on the 30th day of March, 2018, I caused a copy of the documents listed below to be served on the individuals on the attached service list in the manner indicated:

- Official Committee of Unsecured Creditors’ Discovery Demands Directed to Joseph E. Sarachek, Esq.

/s/ Colin R. Robinson

Colin R. Robinson (DE Bar No. 5524)

Woodbridge Discovery Service List

02-Overnight Mail

01-Hand Delivery

04-Electronic Mail

VIA OVERNIGHT MAIL & ELECTRONIC MAIL

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VIA OVERNIGHT MAIL & ELECTRONIC MAIL

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VIA HAND DELIVERY & ELECTRONIC MAIL

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