

**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)

NOTICE OF RULE 30(b)(6) DEPOSITION OF CONTRARIAN FUNDS, LLC

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure (“FRCP”), made applicable herein by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the debtors and debtors in possession (the “Debtors”) in the above-captioned chapter 11 bankruptcy case will take a deposition of Contrarian Funds, LLC (“Contrarian”) on Wednesday, April 18, 2018, commencing at 10 o’clock a.m., at the law offices of Young Conaway Stargatt & Taylor, LLP, Rockefeller Center, 1270 Avenue of the Americas, Suite 2210, New York, New York 10020, or at such other time or place as the Court may specify or the parties may mutually agree.

PLEASE TAKE FURTHER NOTICE that the deposition will be taken before an officer authorized to administer oaths, all testimony will be recorded by stenographic means, LiveNote may be used, and the deposition may also be recorded by audiovisual means.

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 this 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.

PLEASE TAKE FURTHER NOTICE that “the matters for examination,” FRCP 30(b)(6), concern the matters relevant to the *Motion of Contrarian Funds, LLC for Authority to Acquire Promissory Notes Against the Debtors* [Docket No. 890] (the “Motion”), filed by Contrarian on April 3, 2018, specifically including:

- (1) The factual allegations contained in the Motion, including, without limitation, the statement that “Contrarian has contracted to purchase Notes from several Noteholders.”
- (2) Any contracts, assignments, transfers, consents, receipts, bills of sale, remittances, and other Documents of any type constituting or concerning the acquisition of any Notes or claims against the Debtors, including all terms of such transactions (including price) and the consideration, if any, that Contrarian has paid in connection with such transactions.
- (3) Any offers or solicitations made by Contrarian for the acquisition of any Notes (as defined in the Motion) or claims against the Debtors, including the terms and conditions of any such offers or solicitations.
- (4) Any communications between Contrarian and any Noteholder or other creditor of the Debtors, including any negotiations that have taken place and any representations or predictions that have been made by Contrarian.

PLEASE TAKE FURTHER NOTICE that, pursuant to FRCP 30(b)(6), Contrarian must “designate one or more officers, directors, or managing agents, or . . . other persons who consent to testify” on behalf of Contrarian regarding “information known or reasonably available to” Contrarian with respect to the preceding matters.

Dated: April 10, 2018
Wilmington, Delaware

/s/ Sean M. Beach
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