

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Hrg. Date: February 28, 2023 at 11:00 a.m. (ET)  
Obj. Deadline: February 9, 2023 at 4:00 p.m. (ET)

**NOTICE OF THIRTY-SIXTH (36TH) OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE  
BANKRUPTCY CODE, BANKRUPTCY RULE 3007,  
AND LOCAL RULES 3007-1 AND 3007-2**

**PARTIES RECEIVING THIS NOTICE SHOULD LOCATE  
THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED  
ON THE EXHIBITS TO THE ATTACHED PROPOSED ORDER**

TO: (I) THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) THE TRUST AND ITS COUNSEL; (III) ANY PERSON FILING A SPECIFIC REQUEST FOR NOTICES AND PAPERS ON AND AFTER THE EFFECTIVE DATE; AND (IV) CLAIMANTS WHOSE DISPUTED CLAIMS ARE SUBJECT TO THE OBJECTION<sup>2</sup>

**PLEASE TAKE NOTICE** that the Woodbridge Liquidation Trust (the “Trust”) has filed the attached *Thirty-Sixth (36th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”).<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that any responses (each, a “Response”) to the relief requested in the Objection must be filed on or before **February 9, 2023, at 4:00 p.m. (ET)** (the “Response Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. At the same time, any party

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 201 N. Brand Blvd., Suite M, Glendale, CA 92103.

<sup>2</sup> In accordance with Local Rule 3007-2, the Trust has served the parties that, as of the filing of this Notice, have requested notices on and after the Effective Date, with this Notice and the Exhibits to the Objection.

<sup>3</sup> Capitalized terms used but not otherwise defined in this Notice shall have the meanings ascribed to such terms in the Objection.

submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Trust so as to be received on or before the Response Deadline.

**PLEASE TAKE FURTHER NOTICE** that any Response must contain, at a minimum, the following:

- a. a caption setting forth the name of the Court, the above-referenced case number and the title of the Objection to which the Response is directed;
- b. the name of the Respondent and a description of the basis for the amount and classification asserted in the Disputed Claim, if applicable;
- c. a concise statement setting forth the reasons why the particular Disputed Claim should not be disallowed, reclassified or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at any hearing thereon;
- d. all documentation or other evidence of the particular Disputed Claim or asserted amount and classification thereof, to the extent not already included with the proof of claim previously filed, upon which the Respondent will rely in opposing the Objection at any hearing thereon; and
- e. the name, address, telephone number and email address of the person(s) (who may be the Respondent or a legal representative thereof) (i) possessing ultimate authority to reconcile, settle or otherwise resolve the Disputed Claim on behalf of the Respondent and (ii) to whom the Trust should serve any reply to the Response.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING (THE “HEARING”) ON THE OBJECTION WILL BE HELD ON FEBRUARY 28, 2023 AT 11:00 A.M. (ET) BEFORE THE HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE TRUST WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.**

Dated: January 26, 2023  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

-and-

KTBS LAW LLP (*f/k/a Klee, Tuchin, Bogdanoff & Stern LLP*)

Kenneth N. Klee (*pro hac vice*)

Michael L. Tuchin (*pro hac vice*)

David A. Fidler (*pro hac vice*)

Sasha M. Gurvitz (*pro hac vice*)

1801 Century Park East, 26th Floor

Los Angeles, California 90067

*Counsel to Woodbridge Liquidation Trust*

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Hrg. Date: February 28, 2023 at 11:00 a.m. (ET)  
Obj. Deadline: February 9, 2023 at 4:00 p.m. (ET)

**THIRTY-SIXTH (36TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION  
TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

**PARTIES RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES  
AND THEIR DISPUTED CLAIMS IDENTIFIED ON THE EXHIBITS  
TO THE PROPOSED ORDER**

Woodbridge Liquidation Trust (the “Trust”), formed pursuant to the confirmed and effective *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [D.I. 2397] (the “Plan”) in the jointly-administered chapter 11 bankruptcy cases (the “Chapter 11 Cases”) of Woodbridge Group of Companies, LLC and its affiliated debtors (the “Debtors”), hereby files this objection (this “Objection”), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1531 (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 3007-1 and 3007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), to each of the claims filed against the Debtors and their estates that are listed on Exhibits A, B, and C (collectively, the

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

“Disputed Claims”) to the proposed form of order attached hereto as Exhibit 2 (the “Proposed Order”), and request the entry of the Proposed Order modifying the Disputed Claims, as indicated in further detail below and on Exhibits A, B, and C to the Proposed Order. In support of this Objection, the Trust relies on the declaration of Thomas P. Jeremiassen (the “Jeremiassen Declaration”), a copy of which is attached hereto as Exhibit 1. In further support of this Objection, the Trust respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and, pursuant to Local Rule 9013-1(f), the Trust consents to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief requested herein are Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2.<sup>2</sup>

### **GENERAL BACKGROUND**

2. On December 4, 2017, 279 of the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code, and on February 9, 2018, March 9, 2018, March 23, 2018, and March 27 2018, additional affiliated Debtors (27 in total) commenced voluntary cases under chapter 11 of the Bankruptcy Code (collectively, the “Petition Dates”). Pursuant to sections

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

1107(a) and 1108 of the Bankruptcy Code, the Debtors managed their financial affairs as debtors in possession.

3. The Chapter 11 Cases were jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. No trustee or examiner was appointed in the Chapter 11 Cases.

4. Information about the Debtors' business, capital structure and the events leading up to the commencement of these Chapter 11 Cases is set forth in the *Disclosure Statement for the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors* [D.I. 2398] (the "Disclosure Statement"). The Disclosure Statement was approved by order of the Court entered on August 21, 2018 [Docket No. 2396] (the "Solicitation Procedures Order").

5. On April 5, 2018, the Court entered an order [Docket No. 911] (the "Bar Date Order") establishing, *inter alia*, June 19, 2018 (the "General Bar Date") as the deadline by which each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts), other than governmental units, must file (i) a proof of claim based on claims against the Debtors that arose prior to the applicable Petition Date, including requests for allowance and payment of claims under section 503(b)(9), and (ii) a proof of interest based on ownership interests in the Debtors.

6. On October 26, 2018, the Court entered an order confirming the Plan. Dkt. No. 2903 (the "Confirmation Order"). The Plan and Confirmation Order established that the Debtors were operated as a Ponzi scheme. On February 15, 2019, the effective date of the Plan occurred and the Trust was established. *See* Docket No. 3421.

**RELIEF REQUESTED**

7. By this Objection, the Trust requests that the Court enter the Proposed Order, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rules 3007-1 and 3007-2, modifying the Disputed Claims, as indicated in further detail below and on Exhibits A, B, and C to the Proposed Order.

8. In accordance with Local Rule 3007-1(e)(i)(E), the Trust believes that this Objection complies in all material respects with Local Rule 3007-1.

**OBJECTION TO DISPUTED CLAIMS**

9. The Trust has reviewed the Disputed Claims listed on Exhibit A to the Proposed Order (the “Duplicate Claims”) and has determined that each such claim is a duplicate of one or more other proof(s) of claim filed against the same Debtor, in the same amount, on account of a single liability. Because the Debtor may be held liable for this single liability at most once, the Duplicate Claim must be disallowed and expunged. Accordingly, the Duplicate Claims listed on Exhibit A to the Proposed Order should be disallowed and expunged. Failure to disallow and expunge the Duplicate Claims could result in the relevant claimants receiving an unwarranted recovery in respect of a single liability. Moreover, disallowance and expungement of the Duplicate Claims will enable the Trust to maintain a more accurate claims register in these Chapter 11 Cases.

10. The Trust has reviewed the Disputed Claims listed on Exhibit B to the Proposed Order (the “Amended Claims”) and has determined that each such claim has been amended and superseded by another proof of claim filed against the same Debtor, on account of a single liability. Because the claimant intended that the later-filed proof of claim amend and supersede the earlier filed proof(s) of claim, and because the Debtor may be held liable for this single liability at most once, the Amended Claims must be disallowed and expunged. Accordingly, the Amended Claims

listed on Exhibit B to the Proposed Order should be disallowed and expunged. Failure to disallow and expunge the Amended Claims could result in the relevant claimants receiving an unwarranted recovery in respect of a single liability. Moreover, disallowance and expungement of the Amended Claims will enable the Trust to maintain a more accurate claims register in these Chapter 11 Cases.

11. The Trust has reviewed the Disputed Claims listed on Exhibit C to the Proposed Order (the “Late Claims”) and has determined that each such claim was filed after the General Bar Date as established by the Bar Date Order. The Trust understands that each claimant was duly noticed of the General Bar Date, and that such notice made clear that failure to timely file a proof of claim as required by the Bar Date Order may result in the claimant being forever barred, estopped, and enjoined from asserting such claim against the Debtors and their estates. *See* Docket No. 1599. Nevertheless, the claimants filed the Late Claims after passage of the General Bar Date, without obtaining an order extending or otherwise granting relief from the Bar Date Order. The late filing is not excusable and the Late Claims should be disallowed and expunged as requested herein to prevent any inappropriate distribution of estate funds and to facilitate administration of the claims allowance process, consistent with the Bar Date Order.

### **BASIS FOR RELIEF**

12. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). In adjudicating claim objections, courts apply “a burden-shifting framework.” *In re Devonshire PGA Holdings LLC*, 548 B.R. 689, 697 (Bankr. D. Del. 2016). As explained by the Third Circuit Court of Appeals—

Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is “*prima facie*” valid. In other words, a claim that alleges facts sufficient to support a legal liability to the claimant

satisfies the claimant's initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the filed claim. It is often said that the objector must produce evidence equal in force to the *prima facie* case. In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim's legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

*In re Allegheny Int'l Inc.*, 954 F.2d 167, 173–74 (3d Cir. 1992) (citations omitted). Thus at the outset, “a proof of claim that alleges sufficient facts to support liability satisfies the claimant's initial obligation to proceed, after which the burden shifts to the objector to produce sufficient evidence to negate the *prima facie* validity of the filed claim.” *Lampe v. Lampe*, 665 F.3d 506, 514 (3d Cir. 2011); *see also In re Devonshire*, 548 B.R. at 697 (“Initially, the burden of proof lies on the claimant; if the claimant supports his claim with sufficient facts or documentation, the claim is deemed *prima facie* valid. The burden then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the claim.”).

13. Once the *prima facie* validity of a claim is rebutted, “the burden then reverts to the claimant to prove its validity by a preponderance of the evidence.” *In re Devonshire*, 548 B.R. at 697; *see also Raj Singh v. Mariner Post-Acute Network, Inc. (In re Mariner Post-Acute Network, Inc.)*, No. 04-0208, 2005 U.S. Dist. LEXIS 13673, at \*5 (D. Del. July 8, 2005) (“If the objector advances sufficient evidence to challenge the validity of the proof of claim, the burden shifts back to the claimant to prove the claim's validity by a preponderance of the evidence.”). Importantly, the ultimate “burden of persuasion is always on the claimant.” *In re Allegheny Int'l*, 954 F.2d at 174. Indeed, “it is for the claimant to prove his claim, not for the objector to disprove it.” *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citation omitted).

14. A debtor in possession in a chapter 11 case “has the duty to object to the allowance of any claim that is improper.” *Int’l Yacht & Tennis, Inc. v. Wasserman Tennis, Inc. (In re Int’l Yacht & Tennis, Inc.)*, 922 F.2d 659, 661–62 (11th Cir. 1991); *see also* 11 U.S.C. §§ 704(a)(5), 1106(a)(1), & 1107(a). A claimant is not entitled to multiple recoveries for a single liability. *See, e.g., In re Handy Andy Home Improvement Ctrs., Inc.*, 222 B.R. 571, 575 (Bankr. N.D. Ill. 1998) (“[I]t is axiomatic that one cannot recover for the same debt twice.”).

15. Bankruptcy Code section 502(b) provides that a claim shall not be allowed to the extent that “proof of such claim is not timely filed.” 11 U.S.C. § 502(b)(9). A “bar date is akin to a statute of limitations, and must be strictly observed.” *In re Keene Corp.*, 188 B.R. 903, 907 (Bankr. S.D.N.Y. 1995); *see also First Fidelity Bank, N.A. v. Hooker Inves. Inc. (In re Hooker Inves. Inc.)*, 937 F.2d 833, 840 (2d Cir. 1991) (“[A] bar order does not ‘function merely as a procedural gauntlet,’ but as an integral part of the reorganization process.” (citation omitted)).

### **RESPONSES TO THIS OBJECTION**

16. Any responses to this Objection must be filed **on or before 4:00 p.m. (ET) on February 9, 2023**, in accordance with the procedures set forth in the notice of this Objection.

### **RESERVATION OF RIGHTS**

17. The Trust reserves the right to adjourn the hearing on any Disputed Claim, and in the event that the Trust does so, the Trust will state the same in the agenda for the hearing on that Disputed Claim, which agenda will be served on the applicable claimant.

18. The Trust reserves any and all rights to amend, supplement, or otherwise modify this Objection, the Proposed Order, or the Exhibits thereto, and to file additional objections to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Disputed Claims. The Trust also reserves any and all rights, claims and defenses with respect to

any and all of the Disputed Claims, and nothing included in or omitted from this Objection, the Proposed Order, or the Exhibits thereto is intended or shall be deemed to impair, prejudice, waive, or otherwise affect any rights, claims, or defenses of the Trust with respect to the Disputed Claims.

**NOTICE**

19. Notice of this Objection has been provided to the following parties: (i) the United States Trustee for the District of Delaware; (ii) the Trust and its counsel; (iii) any person whose rights are affected by this Objection; and (iv) any person filing a specific request for notices and papers on and after the Effective Date. The Trust submits that, in light of the nature of the relief requested herein, no other or further notice need be given.

**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Trust respectfully requests that the Court (a) enter the Proposed Order, and (b) grant such other and further relief as may be just and proper.

*[Remainder of Page Intentionally Left Blank]*

Dated: January 26, 2023  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899 (Courier 19801)

-and-

KTBS LAW LLP (*f/k/a Klee, Tuchin, Bogdanoff & Stern LLP*)

Kenneth N. Klee (*pro hac vice*)

Michael L. Tuchin (*pro hac vice*)

David A. Fidler (*pro hac vice*)

Sasha M. Gurvitz (*pro hac vice*)

1801 Century Park East, 26th Floor

Los Angeles, California 90067

*Counsel to Woodbridge Liquidation Trust*

**EXHIBIT 1**

Declaration of Thomas P. Jeremiassen

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

**DECLARATION OF THOMAS P. JEREMIASSEN IN SUPPORT OF THIRTY-SIXTH  
(36TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS  
PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

I, Thomas P. Jeremiassen, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Senior Managing Director of Development Specialists, Inc. (“DSI”), located at 333 S. Grand Avenue Suite 4100, Los Angeles, California 90071. Following the “Effective Date” of the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and Its Affiliated Debtors* (the “Plan”), DSI has been engaged to provide forensic accounting and financial advisory services to the Woodbridge Wind-Down Entity LLC (the “Wind-Down Entity”) and the Woodbridge Liquidation Trust (the “Trust”).

2. Prior to the “Effective Date” of the Plan, I supported the Chief Restructuring Officer of WGC Independent Manager LLC, a Delaware limited liability company (“WGC Independent Manager”), which was the sole manager of Woodbridge Group of Companies, LLC, a Delaware limited liability company and an affiliate of each of the entities that were debtors and

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<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

debtors in possession (each, a “Debtor” and collectively, the “Debtors”) in the above-captioned jointly administered chapter 11 cases (the “Chapter 11 Cases”).

3. On February 13, 2018, the Court entered an order authorizing the Debtors to retain and employ DSI as their restructuring advisor. In such capacity, I became familiar with the day-to-day operations and financial affairs of the Debtors. I was one of the individuals responsible for implementing the Debtors’ wind-down and liquidation strategies and overseeing the Debtors’ financial and operational affairs. I have been consistently involved in or am familiar with the Debtors’ wind-down activities and development of the Plan.

4. I submit this declaration in support of the *Thirty-Sixth (36th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”).<sup>2</sup>

5. I am one of the persons responsible for overseeing the claims reconciliation and objection process in these Chapter 11 Cases. Considerable resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtors and their estates in the Chapter 11 Cases. The Disputed Claims were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate personnel and representatives of the Debtors, the Trust, and the Wind-Down Entity. These efforts resulted in the identification of the Disputed Claims.

6. The information contained in Exhibits A, B, and C to the Proposed Order is true and correct to the best of my knowledge, information, and belief.

7. Through a review of the claims register maintained by the claims and noticing agent in these Chapter 11 Cases, the Disputed Claims, and the Trust’s books and records, the Trust has

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

determined that each of the Duplicate Claims on Exhibit A is a duplicate of another proof of claim filed against the same Debtor, in the same amount, on account of a single liability.

8. Through a review of the claims register maintained by the claims and noticing agent in these Chapter 11 Cases, the Disputed Claims, and the Trust's books and records, the Trust has determined that each of the Amended Claims on Exhibit B has been amended and superseded by another proof of claim filed against the same Debtor, on account of a single liability. From a review of the face of the later-filed proofs of claims, it appears the claimant intended to amend and supersede the earlier-filed Amended Claims.

9. Through a review of the claims register maintained by the claims and noticing agent in these Chapter 11 Cases and the Disputed Claims, the Trust has determined that each of the Late Claims on Exhibit C was filed after the General Bar Date as established by the Bar Date Order. The Trust understands that each claimant was duly noticed of the General Bar Date, and that such notice made clear that failure to timely file a proof of claim as required by the Bar Date Order may result in the claimant being forever barred, estopped, and enjoined from asserting such claim against the Debtors and their estates.

10. Accordingly, the Disputed Claims set forth on Exhibits A, B, and C should be disallowed and expunged in their entirety.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.

Executed on January 26, 2023

/s/ Thomas Jeremiassen  
Thomas P. Jeremiassen

**EXHIBIT 2**

Proposed Order

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

In re:

WOODBRIIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

**Re: Docket No.** \_\_\_\_\_

**ORDER SUSTAINING THIRTY-SIXTH (36TH) OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULE 3007, AND LOCAL RULES 3007-1 AND 3007-2**

Upon consideration of the *Thirty-Sixth (36th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rules 3007-1 and 3007-2* (the “Objection”)<sup>2</sup> and the Jeremiassen Declaration; and it appearing that this Court has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and it appearing that venue of these Chapter 11 Cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Trust, its beneficiaries, and other parties in interest; and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record of these Chapter 11 Cases; and after due deliberation thereon and good and

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

sufficient cause appearing therefor; it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Objection is SUSTAINED, as set forth herein.
2. The Disputed Claims identified on Exhibits A, B, and C to this Order are hereby disallowed as set forth on Exhibits A, B, and C with respect to each such Disputed Claim.
3. The Trust's objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
4. The Debtors' claims agent is directed to modify the official claims register it maintains to comport with the relief granted by this Order.
5. Any and all rights of the Trust to amend, supplement, or otherwise modify the Objection and to file additional objections to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Disputed Claims, shall be reserved. Any and all rights, claims, and defenses of the Trust with respect to any and all of the Disputed Claims shall be reserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive, or otherwise affect any rights, claims, or defenses of the Trust with respect to the Disputed Claims.

6. This Court shall retain jurisdiction and power over any and all affected parties with respect to any and all matters, claims, or rights arising from or related to the implementation or interpretation of this Order.

**EXHIBIT A**<sup>1</sup>

**Duplicate Claims (Same Debtor)**

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<sup>1</sup> Capitalized terms used but not otherwise defined on Exhibit A shall have the meanings ascribed to such terms in the Objection.

Claimant Name	Remaining Claim No.	Claim No. To Be Disallowed	Claim Amount (of Disallowed Claim)	Reason for Disallowance
14241 VENTURA LLC	4670	455	\$1,100.00	Claim 4670 and Claim 455 assert the same amount against the same Debtor in respect of the same liability, specifically, a check (#52961) to claimant from Woodbridge Group of Companies, LLC in the amount of \$1,050 that was returned for insufficient funds. Because the Debtor may be held liable for this single liability at most once, the duplicate claim must be disallowed and expunged.
FIRST AMERICAN DATA TREE	7566	1079	\$6,296.68	Claim 7566 and Claim 1079 assert the same amount against the same Debtor in respect of the same liability, specifically, for amounts asserted to be owed on account of invoice numbers 20014321117 and 20014321217. Because the Debtor may be held liable for this single liability at most once, the duplicate claim must be disallowed and expunged.
SOUTHERN CALIFORNIA EDISON COMPANY	9803	9802	\$1,509.93	Claim 9803 and Claim 9802 assert the same amount against the same Debtor in respect of the same liability, specifically, utility services for account ending 5823 from 2017 through the Petition Date for the same listed properties. Because the Debtor may be held liable for this single liability at most once, the duplicate claim must be disallowed and expunged.
STEPHENSON FOURNIER, PLLC	9196	8040 & 8032	\$3,104.37	Claim 9196, Claim 8040, and Claim 8032 assert the same amount against the same Debtor in respect of the same liability, specifically, for legal services re 802 N. Wharton Street, billed on November 30, 2017. Because the Debtor may be held liable for this single liability at most once, the two duplicate claims must be disallowed and expunged.

Claimant Name	Remaining Claim No.	Claim No. To Be Disallowed	Claim Amount (of Disallowed Claim)	Reason for Disallowance
14140 INVESTMENTS LTD	10038	3366 & 10037	\$108,758.40	Claim 10038, Claim 3366, and Claim 10037 all assert the same amount against the same Debtor in respect of the same liability, specifically, lease rejection damages for a property located in Sherman Oaks, California. Because the Debtor may be held liable for this single liability at most once, the two duplicate claims must be disallowed and expunged.

**EXHIBIT B**<sup>1</sup>

**Amended & Superseded Claims**

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<sup>1</sup> Capitalized terms used but not otherwise defined on Exhibit B shall have the meanings ascribed to such terms in the Objection.

Claimant Name	Remaining Claim No.	Claim No. To Be Disallowed	Claim Amount (of Disallowed Claim)	Reason for Disallowance
SOUTHERN CALIFORNIA EDISON COMPANY	9803	7535 & 8182	\$1,479.66	Claim 9803 asserts that it is intended to amend and supersede a previous claim filed by claimant in June 2018 in the amount of \$1,479.66. Claim 7535 and Claim 8182 are identical claims filed by claimant in June 2018 and appear to be the claims intended by claimant to be amended and superseded. All the claims are asserted against the same Debtor in respect of the same liability, specifically, utility services for account ending 5823 from 2017 through the Petition Date. Because the claimant intended to amend and supersede these claims, and because the Debtor may be held liable for this single liability at most once, the two amended and superseded claims must be disallowed and expunged.
SNELL & WILMER LLP	10011	2605	\$116,724.53	Claim 10011 asserts that it is intended to amend and supersede a previous claim filed by claimant. Claim 2605 appears to be the claim intended by claimant to be amended and superseded. Both claims are asserted against the same Debtor in respect of the same liability, specifically, alleged breach of contract for legal services. Because the claimant intended to amend and supersede this claim, and because the Debtor may be held liable for this single liability at most once, the amended and superseded claim must be disallowed and expunged.

**EXHIBIT C**<sup>1</sup>

**Late Claims**

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<sup>1</sup> Capitalized terms used but not otherwise defined on Exhibit C shall have the meanings ascribed to such terms in the Objection.

Claimant Name	Claim No. To Be Disallowed	Date Filed	Claim Amount (of Disallowed Claim)	Reason for Disallowance
BOSWELL CONSTRUCTION INC.	9996	01/22/2019	\$18,735.09	Claim 9996 was filed after the General Bar Date, without seeking relief from the Bar Date Order. Because no excuse justifies the late filing, the claim must be disallowed and expunged.
NATALIE LEWIS	9771	10/06/2018	\$200.00	Claim 9771 was filed after the General Bar Date, without seeking relief from the Bar Date Order. Because no excuse justifies the late filing, the claim must be disallowed and expunged. Additionally, the Trust can find no basis in the Debtors' books and record to support this claim, nor does the claim attach sufficient documentation as support.
TEST TESTING	11001	06/24/2021	\$100,000.00	Claim 9996 was filed after the General Bar Date, without seeking relief from the Bar Date Order. Because no excuse justifies the late filing, the claim must be disallowed and expunged. Additionally, the Trust can find no basis in the Debtors' books and record to support this claim, nor does the claim attach sufficient documentation as support. The claim appears to be fraudulent, <i>e.g.</i> , the claimant's address is listed as "123 No Pl., Nowhere, WA 12345."