

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of the
Woodbridge Liquidation Trust, successor in interest to
the estate of Woodbridge Group of Companies, LLC, *et*
al.,

Plaintiff,

v.

Sylvan & Jeannette Jutte,
Brian & Robin Korkus,
Delton & Jean Christman,
Floyd & Lavonne Davis
George & Charlene Iwahiro,
Toomas & Pamela Heinmets,
Janet V. Dues,
Dena Falkenstein,
Judy Karen Goodin,
Denis W. Hueth,
Christian Lester,
Jane Marshall,
Laurence J. Nakasone,
Blaine Phillips,
George Edward Sargent,
Jeff Schuster,
Jennifer Tom,
Anita Bedoya & Mark Bedoya,
Anita Bedoya & Julian Duran,
Ronald Cole,
Ronald Draper,
Lawrence J. Paynter,
Nannette Tibbitts,

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Adv. Pro. No. 19-50308 (JKS)
Adv. Pro. No. 19-50309 (JKS)
Adv. Pro. No. 19-50314 (JKS)
Adv. Pro. No. 19-50317 (JKS)
Adv. Pro. No. 19-50319 (JKS)
Adv. Pro. No. 19-50322 (JKS)
Adv. Pro. No. 19-50328 (JKS)
Adv. Pro. No. 19-50329 (JKS)
Adv. Pro. No. 19-50330 (JKS)
Adv. Pro. No. 19-50331 (JKS)
Adv. Pro. No. 19-50332 (JKS)
Adv. Pro. No. 19-50335 (JKS)
Adv. Pro. No. 19-50337 (JKS)
Adv. Pro. No. 19-50338 (JKS)
Adv. Pro. No. 19-50340 (JKS)
Adv. Pro. No. 19-50341 (JKS)
Adv. Pro. No. 19-50342 (JKS)
Adv. Pro. No. 19- 50343 (JKS)
Adv. Pro. No. 19-50344 (JKS)
Adv. Pro. No. 19-50346 (JKS)
Adv. Pro. No. 19-50347 (JKS)
Adv. Pro. No. 19-50351 (JKS)
Adv. Pro. No. 19-50353 (JKS)

¹ 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.

Clayton Nakasone,

Defendants.

Adv. Pro. No. 19-50832 (JKS)

Ref Docket No.: N/A

AFFIDAVIT OF SERVICE

STATE OF OHIO)
) ss.:
COUNTY OF FRANKLIN)

ANGELA CHACHOFF, being duly sworn, deposes and says:

1. I am employed as a Case Manager by Epiq Class Action and Claims Solutions, Inc., located at 5151 Blazer Parkway Way, Suite A, Dublin, Ohio 43017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On September 22, 2021, I caused to be served the “Notice of Agenda of Matters Scheduled for Hearing on September 24, 2021 at 1:00 p.m. (Prevailing Eastern Time) Before the Honorable J. Kate Stickles,” dated September 22, 2021, a copy of which is annexed hereto as Exhibit A, filed in the above-referenced cases associated with Woodbridge Group of Companies, LLC, *et al.*, Case No. 17-12560 (JKS), by causing a true and correct copy to be delivered via electronic mail to: *curtishehn@comcast.net*.

/s/ Angela Chachoff
Angela Chachoff

Sworn to before me this
23rd day of September, 2021
/s/ Andrea R. Speelman
Andrea R. Speelman
Notary Public, State of Ohio
Commission Expires March 21, 2024

EXHIBIT A

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estate of Woodbridge Group of
Companies, LLC, *et al.*,

Plaintiff,

v.

Sylvan & Jeannette Jutte,
Brian & Robin Korkus,
Delton & Jean Christman,
Floyd & Lavonne Davis,
George & Charlene Iwahiro,
Toomas & Pamela Heinmets,
Janet V. Dues,
Dena Falkenstein,
Judy Karen Goodin,
Denis W. Hueth,
Christian Lester,
Jane Marshall,
Laurence J. Nakasone,
Blaine Phillips,
George Edward Sargent,
Jeff Schuster,
Jennifer Tom,
Anita Bedoya & Mark Bedoya,
Anita Bedoya & Julian Duran,
Ronald Cole,
Ronald Draper,
Lawrence J. Paynter,
Nannette Tibbitts,
Clayton Nakasone,

Defendants.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Adv. Proc. Case No. 19-50308 (JKS)
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Adv. Proc. Case No. 19-50353 (JKS)
Adv. Proc. Case No. 19-50832 (JKS)

¹ 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.

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON SEPTEMBER 24, 2021 AT 1:00 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE J. KATE STICKLES**

All remote hearings scheduled before Judge Stickles will be conducted entirely over Zoom and will require all participants to register in advance at the link provided below prior to the hearing.

Zoom registration link:

<https://debuscourts.zoomgov.com/meeting/register/vJItd-uprDwoE5ZezN7Xrff-5afQQVebSU>

ORAL ARGUMENT:

I. Complaints and Answers:

A. Adversary case 19-50308

1. *Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Sylvan R. Jutte, Jeannette E. Jutte [Filed 8/26/19] ([Docket No. 1](#))
2. *Answer* Filed by Jeannette E. Jutte, Sylvan R. Jutte [Filed 10/4/19] ([Docket No. 4](#))

B. Adversary case 19-50309

1. *Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Brian D. Korkus, Robin L. Korkus [Filed 8/26/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

C. Adversary case 19-50314.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to §§ 544, 547, 548 & 550* by Michael Goldberg against Delton Christman, Jean Christman [Filed 8/26/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

D. Adversary case 19-50317.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to §§ 544, 547, 548 & 550* by Michael Goldberg against Floyd G Davis, Lavonne J. Davis [Filed 8/26/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

E. Adversary case 19-50319.

1. *Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against George T. Iwahiro, Charlene M. Iwahiro [Filed 8/26/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

F. Adversary case 19-50322.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to §§ 544, 547, 548 & 550* by Michael Goldberg against Toomas Heinmets, Pamela Heinmets [Filed 8/26/19] ([Docket No. 1](#))
2. *Answers* [Filed 9/27/19] ([Docket No. 4](#)); [Filed 10/4/19] ([Docket No. 5](#))

G. Adversary case 19-50328.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Janet V. Dues [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

H. Adversary case 19-50329.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Dena Falkenstein [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

I. Adversary case 19-50330.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Judy Karen Goodin [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

J. Adversary case 19-50331.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Dennis W. Hueth [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 5](#))

K. Adversary case 19-50332.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Christian Lester [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

L. Adversary case 19-50335.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Jane Marshall [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

M. Adversary case 19-50337.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Laurence J. Nakasone [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

N. Adversary case 19-50338.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Blaine Phillips [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

O. Adversary case 19-50340.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against George Edward Sargent [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

P. Adversary case 19-50341.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Jeff Schuster [Filed 8/27/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 5](#))

Q. Adversary case 19-50342.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Jennifer Tom [Filed 8/27/19] ([Docket No. 1](#))

2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

R. Adversary case 19-50343.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Anita Bedoya, Mark Bedoya [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/9/19] ([Docket No. 4](#))

S. Adversary case 19-50344.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Anita Bedoya, Julian Duran [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/9/19] ([Docket No. 4](#))

T. Adversary case 19-50346.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Ronald Cole [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

U. Adversary case 19-50347.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Ronald Draper [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/9/19] ([Docket No. 4](#))

V. Adversary case 19-50351.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Lawrence J. Paynter [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

W. Adversary case 19-50353.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* by Michael Goldberg against Nannette Tibbitts [Filed 8/28/19] ([Docket No. 1](#))
2. *Answer* [Filed 10/4/19] ([Docket No. 4](#))

X. Adversary case 19-50832.

1. *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548 & 550* by Michael Goldberg against Clayton Nakasone [Filed 11/18/19] ([Docket No. 1](#))
2. *Answer* [Filed 12/16/19] ([Docket No. 4](#))

II. Stay Motion and Related Pleadings:

1. *Defendants' Motion to Temporarily Stay the Prosecution of Their Complaint Pending the Determination of Distributions to Class 3 Note Claimants Under the Confirmed Plan* [Filed 5/10/21; Adv. Case No. 19-50308, [Adv. Docket No. 58](#)]
2. *Liquidation Trust's Objection to Defendants' Motion to Temporarily Stay the Prosecution of Their Complaint Pending the Determination of Distributions to Class 3 Note Claimants Under the Confirmed Plan* [Filed 6/23/21; Adv. Case No. 19-50308, [Adv. Docket No. 69](#)]
3. *Reply to Liquidation Trust's Objection to Defendants' Motion to Temporarily Stay the Prosecution of Their Complaints Pending the Determination of Distributions to Class 3 Note Claimants Under the Confirmed Plan* [Filed 7/14/21; Adv. Case No. 19-50308, [Adv. Docket No. 72](#)]
4. *Request for Oral Argument* [Filed 7/21/21; Adv. Case No. 19-50308, [Adv. Docket No. 73](#)]
5. *Notice of Completion of Briefing* [Filed 7/30/21; Adv. Case No. 19-50308, [Adv. Docket No. 74](#)]
6. *[Signed] Order Setting Oral Argument* [Filed 8/23/21; Adv. Case No. 19-50308, [Adv. Docket No. 75](#)]

Status: Oral argument with respect to the Defendants' *Motion to Temporarily Stay the Prosecution of Their Complaint Pending the Determination of Distributions to Class 3 Note Claimants under the Confirmed Plan* will be going forward.

Dated: September 22, 2021
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)

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