

**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.

[SEE ATTACHED **EXHIBIT A**],

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case Nos. (See attached **Exhibit A**)

Hearing Date: March 3, 2021, at 10:30 a.m. (ET)

**Objection Deadline: Feb. 24, 2021, at 4:00
p.m. (ET)**

**LIQUIDATION TRUST'S MOTION FOR ENTRY
OF AN ORDER MODIFYING AND GRANTING A LIMITED WAIVER OF CERTAIN
REQUIREMENTS OF GENERAL ORDER RE: PROCEDURES
IN ADVERSARY PROCEEDINGS**

The Woodbridge Liquidation Trust (the "Liquidation 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* [Docket No. 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 and debtors in possession (collectively, the "Debtors"), respectfully states as follows in support of this motion (this "Motion"):

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.

Relief Requested

1. The Liquidation Trust seeks entry of an order, substantially in the form attached hereto as **Exhibit B** (the “Order”), granting a limited waiver and modification of the Court’s *General Order Re: Procedures in Adversary Proceedings* dated April 7, 2004 (the “General Order”), to permit the Liquidation Trust to file, on behalf of the appointed mediators for each of the Adversary Proceedings, one omnibus status report that provides the status of the mediations and their projected scheduled for completion and, where mediation was completed, confirmation that mediation was completed (in lieu of a certificate of completion). In further support of this Motion, the Liquidation Trust respectfully states as follows.

Jurisdiction and Venue

2. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over these Chapter 11 Cases and the Motion 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 February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of these Chapter 11 Cases and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

3. Pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors consent to the Court’s entry of a final judgment or order with respect to the Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory and legal predicates for the relief requested herein are Bankruptcy Rules 1001 and Local Rule 1001-1(c).

Background

5. On December 4, 2017, 279 of the Debtors (the “Original Debtors”) commenced voluntary cases under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”). Thereafter, on February 9, 2018, March 9, 2018, March 23, 2018, and March 27, 2018, an additional 27 affiliated Debtors (the “Additional Debtors”) commenced voluntary cases under chapter 11 of the Bankruptcy Code (collectively, the “Petition Dates”). The Debtors’ Chapter 11 Cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

6. On December 14, 2017, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors [Docket No. 79] (the “Committee”).

7. Information about the Debtors’ operations, 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* [Docket No. 2398].

8. On October 26, 2018, the Court entered an order confirming the Plan. *See* Docket No. 2903. The Effective Date under the Plan occurred on February 15, 2019 and the Liquidation Trust was established. *See* Docket No. 3421. On February 25, 2019, the Court entered the *Final Decree Closing Certain Cases and Amending Caption of Remaining Cases* [Docket No. 3440] which closed all of the Debtors’ cases other than those of debtors Woodbridge Group of Companies, LLC and Woodbridge Mortgage Investment Fund 1, LLC (the “Remaining Debtors”).

9. The Liquidation Trust filed adversary proceedings (the “Adversary Proceedings”) against the defendants listed on Exhibit A (the “Defendants,” and together with the Plaintiff, the “Parties”).

10. The Defendants in the Adversary Proceedings listed on Exhibit A filed answers and/or other responsive pleadings to the complaints and a proposed form of scheduling order (the “Scheduling Order”) was entered by the Court against the Defendants listed on Exhibit A attached hereto.

11. Pursuant to the Scheduling Order, the Adversary Proceedings were assigned to mediation and the Defendants were to provide Plaintiff with a list of three (3) proposed mediators. Scheduling Order, ¶3. If the Parties did not agree on a mediator, the Plaintiff filed a statement alerting the Court of such inability and requested that the Court select and appoint a mediator for the Adversary Proceedings. *Id.* at ¶4. A mediator was appointed in each of the Adversary Proceedings listed on Exhibit A, either by agreement of the Parties or by order of the Court where no agreement was reached or the Defendant failed to respond or submit proposed mediators.

Basis for Relief

12. Pursuant to the General Order, [w]ithin sixty (60) days after the entry of the *Order Assigning Adversary to Mediation*, the mediator shall either (a) file the mediator’s certificate of completion, or, (b) if the mediation is not concluded, file a status report that provides the projected scheduled for completion of the mediation.” *See General Order*, ¶4(a). Mediations are conducted pursuant to Local Rule 9019-5. Bankruptcy Rule 1001 provides that the Bankruptcy Rules “shall be construed, administered, and employed by the court and parties to secure the just, speedy, and inexpensive determination of every case and proceeding.” Fed. R.

Bankr. P. 1001. Further, Local Rule 1001-1(c) provides that “[t]he application of these Rules in any case or proceeding may be modified by the Court in the interest of justice.” *See* Del. Bankr. L.R. 1001(c). Finally, Local Rule 1001-1(e) provides that “[t]hese Local Rules supersede all previous Local Rules promulgated by the Court, but do not affect any General Order issued by the Court...”

13. The Liquidation Trust respectfully submits sufficient cause exists to grant the relief requested in this Motion. Over one-hundred Adversary Proceedings were assigned to mediation and the mediators have, or will file the status report required by the General Order or, in those Adversary Proceedings where mediation is complete, a certificate of completion. Due to the number of Adversary Proceedings assigned to mediation, the appointment of multiple mediators and the unique circumstances in scheduling multiple mediations by Zoom and then filing status reports or certificates of completion, in an effort to ease the burden on the mediators and present a more uniform, comprehensive update to the Court on the status of the mediations, the Liquidation Trust believes that granting a limited waiver of the General Order, specifically with respect to paragraph 4(a) and for the Adversary Proceedings in these Chapter 11 Cases only, is appropriate in these circumstances and will not prejudice the Defendants or any other interested party.

14. While the General Order governs the submission of the status reports by the mediator, the Liquidation Trust respectfully submits that a limited waiver of the General Order to allow the Liquidation Trust to file one omnibus report every sixty (60) days on behalf of the mediators in lieu of individual status reports for each mediation, is in the interest of justice and will assist in the just, speedy, and inexpensive determination of the Adversary Proceedings.

Additionally, the status report for the mediations can be combined with and included in the omnibus status reports the Liquidation Trust already files in the Adversary Proceedings.

Notice

15. Notice of this Motion will be provided to the following parties: (i) the U.S. Trustee; (ii) all parties to the Adversary Proceedings and their counsel, if known; and (iii) all parties who have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Liquidation Trust respectfully submits that no other or further notice is necessary.

No Prior Request

16. No prior request for the relief sought in this Motion has been made to this or any other court.

[Remainder of page intentionally left blank.]

WHEREFORE, the Liquidation Trust requests the Court enter the Proposed Order, granting the relief requested herein and such other and further relief as is just and proper.

Dated: February 9, 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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-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*)

Jonathan M. Weiss (*pro hac vice*)

1801 Century Park East, 26th Floor

Los Angeles, California 90067

Tel: (310) 407-4000

Fax: (310) 407-9090

Counsel to the Liquidation Trust

**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.

[SEE ATTACHED EXHIBIT A],

Defendants.

Chapter 11

Case No. 17-12560 (BLS)
(Jointly Administered)

Adversary Proceeding
Case Nos. (See attached Exhibit A)

Hearing Date: March 3, 2021, at 10:30 a.m. (ET)
**Objection Deadline: February 24, 2021, at 4:00
p.m. (ET)**

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN
ORDER MODIFYING CERTAIN REQUIREMENTS OF LOCAL RULE 3007-1**

PLEASE TAKE NOTICE that the Woodbridge Liquidation Trust (the "Liquidation Trust") has filed the attached (the "Motion").

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **February 24, 2021 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Liquidation Trust so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON MARCH 3, 2021 AT 10:30 A.M. (ET) BEFORE THE HONORABLE BRENDAN L. SHANNON IN THE UNITED STATES BANKRUPTCY COURT FOR THE

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.

DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THEN THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: February 9, 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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-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*)

Jonathan M. Weiss (*pro hac vice*)

1801 Century Park East, 26th Floor

Los Angeles, California 90067

Tel: (310) 407-4000

Fax: (310) 407-9090

Counsel to the Liquidation Trust

EXHIBIT A

	Defendant(s)	Case No.
1.	Thomas Furman	19-50299
2.	Stefan Kolosenko	19-50301
3.	Alexander S. Aduna, Emma R. Aduna.	19-50307
4.	Sylvan R. Jutte, Jeannette E. Jutte	19-50308
5.	Brian D. Korkus, Robin L. Korkus	19-50309
6.	Russell Bullis, Betsy Bullis	19-50310
7.	Mary M. Noyes, Gale E. Noyes	19-50312
8.	Darrell Sandison, Mattie Sandison	19-50313
9.	Delton Christman, Jean Christman	19-50314
10.	Floyd G Davis, Lavonne J. Davis	19-50317
11.	George T. Iwahiro, Charlene M. Iwahiro	19-50319
12.	Toomas Heinmets, Pamela Heinmets	19-50322
13.	Richard E. Attig, Stephanie L. Attig	19-50325
14.	Jason Curtis	19-50327
15.	Janet V. Dues	19-50328
16.	Dena Falkenstein	19-50329
17.	Judy Karen Goodin	19-50330
18.	Dennis W. Hueth	19-50331
19.	Christian Lester	19-50332
20.	Joseph Lin	19-50334
21.	Jane Marshall	19-50335
22.	Laurence J. Nakasone	19-50337
23.	Blaine Phillips	19-50338
24.	George Edward Sargent	19-50340
25.	Jeff Schuster	19-50341
26.	Jennifer Tom	19-50342
27.	Anita Bedoya, Mark Bedoya	19-50343
28.	Anita Bedoya, Julian Duran	19-50344
29.	Ronald Cole	19-50346
30.	Ronald Draper	19-50347
31.	Stephen B. Moore	19-50350
32.	Lawrence J. Paynter	19-50351
33.	Nannette Tibbitts	19-50353
34.	Ascensus, LLC, Custodian for the Benefit of Donald L. Engle Jr. IRA, Donald L. Engle Jr.	19-50566
35.	Mainstar Trust, Custodian for the Benefit of Lorie Gorman, Lorie Gorman	19-50567
36.	IRA Services Trust Company, Custodian for the Benefit of James C. Chang IRA, James C Chang	19-50576
37.	Mainstar Trust, Custodian for the Benefit of John Korbiernecki, John Korbiernecki	19-50578
38.	IRA Services Trust Company, Custodian for the Benefit of Dwight L. Atherton IRA, Dwight L Atherton	19-50581

	Defendant(s)	Case No.
39.	Ascensus, LLC, Custodian for the Benefit of Deborah J. Murphy IRA, Deborah J. Murphy	19-50583
40.	Ascensus, LLC, Custodian for the Benefit of Larry A. Norton IRA, Larry A. Norton	19-50586
41.	Anthony Arthur Meola Jr., in his capacity as Trustee of the Anthony Arthur Meola Jr. 2008 Trust, Anthony Arthur Meola Jr.	19-50741
42.	Mainstar Trust, Custodian for the Benefit of Timothy Hawley, Timothy Hawley	19-50750
43.	Irmgard Herrmann	19-50752
44.	Christ Temple Baptist Church	19-50756
45.	Ascensus, LLC, Custodian for the Benefit of John B. Smith IRA, John B Smith	19-50760
46.	Mainstar Trust, Custodian for the Benefit of Sherry L. Collver, Sherry L. Collver	19-50794
47.	Mainstar Trust, Custodian for the Benefit of Jeanne Marie Spezia; Jeanne Marie Spezia	19-50806
48.	IRA Services Trust Company, Custodian for the Benefit of Lynette Eddy IRA, Lynette Eddy	19-50808
49.	IRA Services Trust Company, Custodian For The Benefit of Earl Eddy IRA, Earl Eddy	19-50814
50.	Marcella P. Best	19-50819
51.	Althea McCormick	19-50823
52.	Kirk W Chubka	19-50826
53.	Mary Ellen Nuhn	19-50829
54.	Ascensus, LLC d/b/a Provident Trust Group, Custodian for the Benefit of Sharon R. Ferry IRA, Sharon R. Ferry	19-50831
55.	Clayton Nakasone	19-50832
56.	Hart Placement Agency, Inc.	19-50847
57.	Robert Elmer	19-50850
58.	Peter Greenberg	19-50855
59.	Kathy Hagen, in her Capacity as Trustee to the Kathy A. Hagen Declaration of Trust Dated March 2, 1998, Kathy Hagen	19-50869
60.	Fred Randhahn; Karen Randhahn; Ascensus, LLC d/b/a Provident Trust Group, Custodian for the Benefit of Antelope Women's Center 401K PSP for the Benefit of Karen Randhahn; Kronos Global Advisors, Inc.	19-50908
61.	Phillip Ball (aka Larry Ball)	19-50913
62.	Michael Kandravi	19-50914
63.	Maxwell Financial Group, Inc.	19-50915
64.	Kim Butler	19-50917
65.	Joseph Rubin Inc., a New York corporation, Joseph Rubin	19-50918
66.	Mark Goldfinger	19-50920
67.	All Mark Insurance Services, Inc., Cameron Johnson	19-50921

	Defendant(s)	Case No.
68.	Chris Dantin Financial Services, LLC, Chris A. Dantin, Sr.	19-50922
69.	Danny Van Houten	19-50927
70.	Retirement Services LLC	19-50931
71.	Jerome Schwartz, Associated Insurance Group, Incorporated	19-50938
72.	Eric Little	19-50944
73.	Frontier Advisors Group LLC, David Nichols	19-50945
74.	John Fagan	19-50947
75.	Ivy League College Planning Strategies, Inc., Michael Rappa	19-50951
76.	James Lamont	19-50952
77.	Gregg W. Butler	19-50958
78.	Gerard J. O'Neill	19-50964
79.	James E. Campbell Jr. Inc. (d/b/a Campbell Financial Corp.), and James E. Campbell, Jr.	19-50965
80.	David Keledjian	19-50973
81.	Harold Plain	19-50974
82.	Joseph W. Isaac	19-50976
83.	Randy Robertson	19-50977
84.	Joseph A. Loox	19-50978
85.	Donovan Knowles	19-50980
86.	Gregory Jandt	19-50981
87.	James A. Klohn & Assoc., P.A.	19-50989
88.	John J. McNamara	19-50998
89.	David Valencia, Valencia Financial Services, LLC	19-51000
90.	Bette Tydings	19-51002
91.	Ricki Dean Wiggs a/k/a Ricki Wiggs	19-51003
92.	Retirement Planning Solutions, LLC, Gordon Hannah	19-51004
93.	Daniel P. Orfin	19-51005
94.	Dennis Drake, Mid-Atlantic Brokers, Inc.	19-51006
95.	Dan Reisinger	19-51007
96.	Richard Anthony Miller	19-51008
97.	Harris Financial Management and John G. Harris	19-51011
98.	Gaulan Financial LLC	19-51012
99.	Legacy Financial Network and Retirement Services, Inc. and Jeffrey Nimmow	19-51016
100.	Searchlight Financial Advisors, LLC, Caroline Rakness	19-51022
101.	Safe Money Broadcasting, LLC, Michael P. Litwin	19-51023
102.	Kenneth Halbert	19-51027
103.	Alfred S. Malianni, In His Capacity As Co-Trustee Of The Alfred S. And Gail E. Malianni Revocable Living Trust January 15, 2011; Gail E. Malianni, in her capacity as co-trustee of the Alfred S. and Gail E. Malianni Revocable Living Trust January 15, 2011; Alfred S. Malianni; Gail E. Maliani	19-51034

	Defendant(s)	Case No.
104.	Basic Financial Services Inc., Basic Wealth Advisors, Inc., Fred C. Johnson	19-51039
105.	TWH Annuities & Insurance Agency, Inc., Gryphon Financial Services	19-51042
106.	Sycamore Group, Inc., Bender W. Mackey	19-51043
107.	Uma Gajavada	19-51046
108.	Jay N. Brown	19-51047
109.	Robert Biscardi Jr.	19-51048
110.	Arash Tashvighi	19-51049
111.	Ascensus, LLC, Administrator and Custodian for the Benefit of Christopher M. Soulier Roth IRA, Christopher M. Soulier	19-51050
112.	To The Max Marketing, Inc.	19-51066
113.	Structured Strategies, LLC, Alan K. Hoffman	19-51067
114.	Deb Brundage	19-51069
115.	Matthew Schwartz, Matte Black Inc.	19-51077
116.	Ascensus, LLC, Custodian for the Benefit of Gail Marie Bush IRA, Gail Marie Bush, Gail Marie Bush as Trustee of the Gail Marie Bush Trust Dated 12/21/2001	19-51133
117.	IRA Services Trust Company, Custodian for the Benefit of Richard Derf Sep IRA, Richard Derf	19-51136
118.	Harry R. Culotta, in his Capacity as Trustee of the Harry R. Culotta Trust Dated 11/16/16, Harry R. Culotta	19-51138
119.	Ascensus, LLC d/b/a Provident Trust Group, Custodian for the Benefit of Kerstin Rodriguez IRA, Kerstin Rodriguez	19-50837
120.	Bank of America Corporation	19-51031
121.	Asset Management Consultants of NC, Inc., Carlton Scott Phillips	19-50929

Exhibit B

Proposed Order

**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.

[SEE ATTACHED EXHIBIT A],

Defendants.

Chapter 11

Case No. 17-12560 (BLS)
(Jointly Administered)

Adversary Proceeding
Case Nos. (See attached Exhibit A)

**ORDER MODIFYING AND GRANTING LIMITED WAIVER OF GENERAL ORDER
RE: PROCEDURES IN ADVERSARY PROCEEDINGS**

Upon the motion (the "Motion")² of the Liquidation Trust, pursuant to Rule 1001 of the Federal Rules of Bankruptcy Procedure and Rule 1001-1(c) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, for an order (this "Order") modifying and granting a limited waiver of *General Order Re: Procedures in Adversary Proceedings* (the "General Order"), all as more fully set forth in the Motion; and this Court having jurisdiction over this matter 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

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Liquidation Trust's notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided, except as set forth herein; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if necessary; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The requirement of the General Order that a mediator file within sixty (60) days after entry of the *Order Assigning Adversary to Mediation* either (a) a certificate of completion or (b) a status report that provides the projected schedule for completion of the mediation if the mediation is not concluded is hereby modified and the mediators appointed in the Adversary Proceeding are granted a limited waiver of the General Order in the Adversary Proceedings.
3. The Liquidation Trust is authorized to file an omnibus mediation status report ("Omnibus Mediation Status Report"), on behalf of the mediators appointed in the Adversary Proceedings every sixty (60) days, which Omnibus Mediation Status Report can be combined with the omnibus status reports filed by the Liquidation Trust.

4. The initial Omnibus Mediation Report shall be filed on or before March 15, 2021 and every sixty (60) days thereafter.

5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

6. Nothing in this Order shall prejudice the Liquidation Trust's right to seek further modifications or waivers of the Local Rules or otherwise from this Court.

7. The Liquidation Trust is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.