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11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 IN RE WOODBRIDGE
16 INVESTMENTS LITIGATION

Case No. 2:18-cv-00103-DMG-MRW

17 **REPLY DECLARATION OF MAKENNA**
18 **COX IN SUPPORT PLAINTIFFS’**
19 **UNOPPOSED MOTION FOR FINAL**
20 **SETTLEMENT APPROVAL AND**
21 **PLAINTIFFS’ APPLICATION FOR**
22 **ATTORNEYS’ FEES AND**
23 **REIMBURSEMENT OF EXPENSES AND**
24 **PAYMENT OF INCENTIVE AWARDS**

25 Date: December 17, 2021
26 Time: 10:00 a.m.
27 Courtroom: 8C, Eighth Floor
28 Judge: Honorable Dolly M. Gee

1 I, Makenna Cox, hereby declare as follows:

2 1. I am an attorney licensed to practice in the State of California and an
3 associate with the law firm Girard Sharp LLP, Settlement Class Counsel for Plaintiffs in
4 this action. I submit this declaration in support of Plaintiffs’ Reply in Support of
5 Unopposed Motion for Final Settlement Approval and Application for Attorneys’ Fees
6 and Reimbursement of Expenses and Payment of Incentive Awards. The following
7 statements are based on my personal knowledge, review of the files in this case, and
8 public information. If called upon to do so, I could and would testify competently to these
9 facts.

10 2. I submit this declaration to advise the Court of response of class members
11 to the Notice of Proposed Class Action Settlement (the “Notice”).

12 3. The Court on September 3, 2021, entered an order granting Plaintiffs’
13 motion for Preliminary Approval. [Doc. # 192]. Pursuant to the Court’s Order, the
14 Trustee of the Woodbridge Liquidation Trust, Michael I. Goldberg (“the Trustee”), has
15 submitted a declaration showing he sent notice by first-class mail to Non-Contributing
16 Claimants at their last-known mailing addresses on file with the Trust. The same day, the
17 Trustee caused a PDF version of the Notice, the Settlement Agreement, and the Motion
18 for Preliminary Approval and supporting documents to be posted in multiple locations on
19 the Trust’s website, <https://woodbridgeliquidationtrust.com/>. [Doc. # 202, ¶ 12.]

20 4. On October 8, 2021, Plaintiffs moved for final settlement approval and filed
21 their application for attorneys’ fees, costs, and service awards. [Doc. # 199, 200].

22 5. On October 13, 2021, the Trustee caused a PDF version of Plaintiffs’
23 Motion for Final Settlement Approval, Plaintiffs’ Motion for Attorneys’ Fees, Costs, and
24 Service Awards, the Declaration of Daniel C. Girard in support of Plaintiffs’ motions for
25 final settlement approval and attorneys’ fees and reimbursement, and the Declaration of
26 Michael I. Goldberg in support of the same to be posted at multiple locations on the
27 Trust’s website, <https://woodbridgeliquidationtrust.com/>.

