

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

In re:  
FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11  
Case No. 22-10584 (CTG)  
(Jointly Administered)

**SCHEDULES OF ASSETS AND LIABILITIES FOR  
MAVERICK II HOLDINGS, LLC (CASE NO. 22-10583)**

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.



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Case No.: 22-10584 (CTG)

(Jointly Administered)

**GLOBAL NOTES AND STATEMENT OF LIMITATIONS, METHODOLOGY,  
AND DISCLAIMERS REGARDING THE DEBTORS' SCHEDULES OF  
ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS**

On June 30, 2022 (the “Petition Date”), First Guaranty Mortgage Corporation (“FGMC”) and its affiliated debtor in the above-captioned Chapter 11 cases (each a “Debtor” and, collectively, the “Debtors”) commenced voluntary cases (the “Chapter 11 Cases”) under chapter 11 of title 11, United States Code, §§ 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

The Debtors continue to operate their businesses and manage their properties as debtors and debtors in possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases have been consolidated for procedural purposes only and are being jointly administered under case number 22-10584 (CTG).

The Schedules of Assets and Liabilities (the “Schedules”) and Statements of Financial Affairs (the “Statements”) were prepared pursuant to Bankruptcy Code section 521 and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) by management of the Debtors with unaudited information available as of the Petition Date.

These *Global Notes and Statement of Limitations, Methodology, and Disclaimers Regarding the Debtors' Schedules of Assets and Liabilities and Statements of Financial Affairs* (the “Global Notes”) are incorporated by reference in, and comprise an integral part of, each of the Debtors' Schedules, Statements, exhibits, and continuation sheets, and should be referred to in connection with any review of the Schedules and Statements. Disclosure of information in one Schedule, Statement, exhibit, or continuation sheet, even if incorrectly placed, shall be deemed to be disclosed in the correct Schedule, Statement, exhibit, or continuation sheet.

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<sup>1</sup> The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: First Guaranty Mortgage Corporation (9575) and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

**The Schedules and Statements and these Global Notes should not be relied upon by any persons for information relating to current or future financial conditions, events, or performance of any of the Debtors.**

**1. Reservation of Rights.** The Debtors' Chapter 11 Cases are large and complex. The Debtors' management has made every reasonable effort to ensure that the Schedules and Statements are as accurate and complete as possible, based on the information that was available to them at the time of preparation.

Subsequent information or discovery may result in material changes to these Schedules and Statements, and inadvertent errors or omissions may have occurred. As the Schedules and Statements contain unaudited information, which is subject to further review, verification, and potential adjustment, there can be no assurance that these Schedules and Statements are accurate and/or complete. Accordingly, the Debtors reserve all rights to supplement and amend the Schedules and Statements.

The Debtors have made reasonable efforts to characterize, classify, categorize, or designate the claims, assets, executory contracts, unexpired leases, and other items reported in the Schedules and Statements correctly. Due to the complexity and size of the Debtors' businesses, however, the Debtors may have improperly characterized, classified, categorized, or designated certain items. In addition, certain items reported in the Schedules and Statements could be included in more than one category. In those instances, one category has been chosen to avoid duplication. Further, the designation of a category is not meant to be wholly inclusive or descriptive of the rights or obligations represented by such item.

**2. No Waiver.** Nothing contained in the Schedules and Statements, or these Global Notes shall constitute an admission or a waiver of rights with respect to these Chapter 11 Cases, including, but not limited to, any issues involving substantive consolidation for plan purposes, subordination, and/or causes of action arising under the provisions of Chapter 5 of the Bankruptcy Code and other relevant non-bankruptcy laws to recover assets or avoid transfers. For the avoidance of doubt, listing a claim on Schedule D as "secured," on Schedule E as "priority," on Schedule F as "unsecured priority," or listing a contract or lease on Schedule G as "executory" or "unexpired," does not constitute an admission by the Debtors of the legal rights of the claimant and/or contractual counterparty, or a waiver of a Debtors' right to recharacterize or reclassify such claim or contract. Failure to designate a claim on a given Debtor's Schedules as "disputed," "contingent," or "unliquidated" does not constitute an admission by the Debtors that such amount is not "disputed," "contingent," or "unliquidated" or that such claim is not subject to objection. The Debtors reserve their respective rights to dispute, or assert offsets, setoffs, or defenses to, any claim reflected on the Schedules as to the nature, amount, liability, or status or to otherwise subsequently designate any claim as disputed, contingent, and/or unliquidated.

**3. Basis of Presentation.** The Debtors historically prepared consolidated quarterly and annual consolidated financial statements that were audited annually. The last full year audit was for calendar year 2021, ending December 31, 2021. Unlike the consolidated financial statements, the Schedules and Statements generally reflect the assets and liabilities of each Debtor on a non-consolidated basis. Accordingly, the amounts listed in the Schedules and Statements will likely

differ, at times materially, from the consolidated financial reports prepared historically by the Debtors.

Although the Schedules and Statements may, at times, incorporate information prepared in accordance with GAAP (General Accepted Accounting Principles), the Schedules and Statements neither purport to represent nor reconcile to financial statements otherwise prepared and/or distributed by the Debtors in accordance with GAAP.

4. **Reporting Date.** Each Debtor operates on a fiscal year ending on December 31<sup>st</sup> annually. All asset and liability information, except where otherwise noted, is provided as of the Petition Date.

5. **Currency.** All amounts are reflected in U.S. dollars, which the Debtors use as their reporting currency.

6. **Estimates and Assumptions.** The preparation of the Schedules and Statements required the Debtors to make estimates and assumptions that affected the reported amounts of certain assets and liabilities, the disclosure of certain contingent assets and liabilities, and the reported amounts of revenue and expense. Actual results could differ materially from these estimates. The Debtors reserve the right to amend the reported amounts of assets, liabilities, revenues, and expenses to reflect changes in those estimates or assumptions.

7. **Totals.** All totals that are included in the Schedules and Statements represent totals of all known amounts. To the extent there are unknown or undetermined values or, conversely, claims listed as unliquidated, contingent and/ or disputed, the actual totals may be different than the listed totals.

8. **Undetermined, To be Determined or Unknown Amounts.** The description of an amount as “undetermined,” “to be determined,” or “unknown” is not intended to reflect upon the materiality of such amount. Certain amounts may be clarified during the Chapter 11 Cases.

9. **Asset Presentation and Valuation.** The Debtors’ assets presented are based on values consistent with their books and records. These values do not purport to represent the ultimate value that would be received in the event of a sale and may not represent economic value as determined by an appraisal or other valuation technique. As it would be prohibitively expensive and an inefficient use of estate assets for the Debtors to obtain current economic valuations for all of their assets, unless otherwise noted, the carrying value on the Debtors’ books (*e.g.*, net book value), rather than current economic values, is reflected on the Schedules and Statements.

10. **Contingent Assets and Causes of Action.** Despite their reasonable efforts to identify all known assets, the Debtors may not have listed all of their causes of action or potential causes of action against third parties as assets in their Schedules and Statements, including, but not limited to, avoidance actions arising under Chapter 5 of the Bankruptcy Code and actions under other relevant non-bankruptcy laws to recover assets. The Debtors reserve all of their rights with respect to any causes of action, avoidance actions, controversy, right of set-off, cross claim, counterclaim, or recoupment, and any claim in connection with any contract, breach of duty imposed by law or

in equity, demand, right, action, lien, indemnity, guaranty, suit, obligation, liability, damage, judgment, account, defense, power, privilege, license, and franchise of any kind or character whatsoever, known, unknown, fixed or contingent, matured or unmatured, suspected or unsuspected, liquidated or unliquidated, disputed or undisputed, secured or unsecured, assertible directly or derivatively, whether arising before, on, or after the Petition Date, in contract or in tort, in law or in equity, or pursuant to any other theory of law they may have, and neither these Global Notes nor the Schedules and Statements shall be deemed a waiver of any such claims, causes of actions, or avoidance actions or in any way prejudice or impair the assertion of such claims.

**11. Payment of Prepetition Claims Pursuant to First and Second-Day Orders.** Following the Petition Date, the Bankruptcy Court entered certain orders (the “First and Second Day Orders”) authorizing, but not directing, the Debtors to, among other things, pay certain (a) prepetition amounts necessary to continue the origination and servicing of mortgage loans in the ordinary course; (b) insurance and surety bond obligations; (c) obligations to critical vendors used in connection with the origination and servicing activities; (d) employee wages, salaries, and related items, including employee benefit programs and supplemental workforce obligations; and (e) service charges and other fees, costs, and expenses charged by the Debtors’ cash management banks. Where the Schedules and Statements list creditors and set forth the Debtors’ scheduled amounts attributable to such claims, such scheduled amounts reflect balances owed as of the Petition Date. In addition, the Debtors are in the process of re-issuing refund checks to borrowers for overpayments that were outstanding and stopped as of the Petition Date. These are not reflected in the scheduled amounts. The Debtors reserve the right to update the Schedules and Statements to reflect payments made pursuant to the First and Second Day Orders that may not be represented in the attached Schedules and Statements.

**12. Pledged Assets.** Virtually all of the assets listed on the Debtors’ Schedule A/B have been pledged as collateral by the Debtors. Assets pledged as collateral include, among other things, cash, deposit accounts, accounts receivable, mortgage loans, construction loans, mortgage loan servicing rights, intellectual property/trademarks, equipment, contract rights, and all other personal property, including general intangibles.

**13. Liabilities.** Some of the scheduled liabilities are unknown, contingent, and/or unliquidated at this time. In such cases, the amounts are listed as “unknown.” Further, liabilities such as certain deferred liabilities, accruals, or general reserves are included as “unknown” and do not represent specific claims as of the Petition Date for each Debtor. The Debtors recognize additional accrued pre-petition liabilities for amounts that have yet to be invoiced, however they are unable to accurately state the amount used pursuant to their various service agreements. Accordingly, the total amounts listed for some categories of liabilities in the Schedules and the Statements may not be equal to the aggregate amount of the Debtors’ total liabilities as noted on any financial statements issued prior to the Petition Date.

The liabilities listed on the Schedules and Statements do not reflect any analysis of claims under section 503(b)(9) of the Bankruptcy Code. Accordingly, the Debtors reserve all rights to dispute or challenge the validity of any asserted claims under section 503(b)(9) of the Bankruptcy Code or the characterization of the structure of any such transaction or any document or instrument related to any creditor’s claim.

**14. Creditor Facilities.** Although there may be multiple parties that hold a portion of the debt comprising the Debtors' prepetition credit facilities and notes, only the administrative agents, as applicable, have been listed for purposes of Schedule D and E/F.

**15. Confidentiality.** As applicable, the home addresses and personally identifiable information of most of the Debtors' current and former employees (including current and former directors and officers) have been redacted to ensure confidentiality. *See Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, and (C) Redact Certain Personally Identifiable Information for Individual Creditors and Interest Holders and (II) Granting Related Relief* [Docket No. 57].

**16. Excluded Assets and Liabilities.** The Debtors believe that they have identified, but did not necessarily value, all material categories of assets and liabilities in the Schedules. The Debtors have excluded the following items which may be included in their GAAP financial statements from the Schedules: accrued salaries, employee benefit accruals, and certain other accruals, capitalized interest, debt acquisition costs, goodwill, financial instruments, certain other assets, and gains. The Debtors also have excluded rejection damage claims of counterparties to executory contracts and unexpired leases that may be rejected, to the extent such damage claims exist. Other immaterial assets and liabilities may also have been excluded.

**17. Liens.** The inclusion on Schedule D of creditors is not an acknowledgement of the validity, extent, or priority of any liens, and the Debtors reserve their right to challenge such liens and the underlying claims on any ground whatsoever. A careful review of the applicable agreements and other relevant documents is necessary for a complete description of the collateral and the nature, extent and priority of any liens. Nothing in these Global Notes or the Schedules and Statements shall be deemed a modification or interpretation of the terms of such agreements or an acknowledgment of same. Certain liens may have been inadvertently marked as disputed but had previously been acknowledged in an order of the Court as not being disputed by the Debtors. It is not the Debtors' intent that Schedules be construed to supersede any orders entered by the Bankruptcy Court.

**18. Insiders.** For the purposes of their responses to Statement Question 28, the Debtors have listed the current officers and directors for each individual Debtor entity to the extent available based on current records. For purposes of Statement Question 4 and 30, the Debtors have included "insiders," as those members of the board of directors of Debtors and Debtors' principal officers (members of management who are responsible for determining the Company's operating policies and financial undertakings, including Chief Executives and Executive Vice-Presidents).

Persons listed as "insiders" have been included for informational purposes only and do not constitute an admission that any such individuals are insiders for purposes of the Bankruptcy Code or otherwise. The Debtors do not take any position with respect to: (a) such person's influence over the control of the Debtors; (b) the management responsibilities or functions of such individual; (c) the decision-making or corporate authority of such individual; or (d) whether such individual could successfully argue that he or she is not an "insider" under

applicable law, including the federal securities laws, or with respect to any theories of liability or for any other purpose.

**19. Signatory.** The Schedules and Statements have been signed by Aaron Samples in his capacity as Chief Executive Officer of FGMC. In reviewing and signing the Schedules and Statements, he has necessarily relied upon the efforts, statements and representations of various of the Debtors' personnel and professionals. He has not (and could not have) personally verified the accuracy of each such statement and representation, including statements and representations concerning amounts owed to creditors and their addresses.

**20. Limitation of Liability.** The Debtors and their officers, employees, agents, attorneys, and financial advisors do not guarantee or warrant the accuracy, completeness, or correctness of the data that is provided herein and shall not be liable for any loss or injury arising out of or caused, in whole or in part, by the acts, errors, or omissions, whether negligent or otherwise, in procuring, compiling, collecting, interpreting, reporting, communicating, or delivering the information contained herein. In no event shall the Debtors or their officers, employees, agents, attorneys, and financial advisors be liable to any third party for any direct, indirect, incidental, consequential, or special damages (including, but not limited to, damages arising from the disallowance of a potential claim against the Debtors or damages to business reputation, lost business, or lost profits), whether foreseeable or not and however caused.

**21. Unknown Addresses.** The Debtors have made and continue to make their best efforts to collect all addresses for all parties in interest; not all addresses for parties on these Schedules and Statements have been obtained. The Debtors continue to pursue complete notice information and will provide updated information as reasonably practicable.

### **Schedules of Assets and Liabilities**

#### **Schedule A/B Notes.**

- **General.** Each Debtors' assets in Schedule A/B are listed at net book value as of the Petition Date, unless otherwise noted, and may not necessarily reflect the market or recoverable value of these assets as of the Petition Date.
- **Cash and Cash Equivalents (AB1 through AB5).** The Debtors have only included accounts that were active as of the petition date.
- **Bank Accounts (AB3).** The reflected bank balances are as of June 30, 2022. In instances where FGMC is acting in a custodial capacity on behalf of third parties, such banks accounts and amounts are excluded.
- **Deposits (AB7).** The Debtors have made reasonable efforts to identify all deposits. However, the Schedules may not reflect an exhaustive list of deposits.

- Prepayments (AB8). The Debtors have made reasonable efforts to identify all prepayments and the majority of the prepayments were identified from an accounting accrual perspective.
- Accounts Receivable (AB11). Accounts receivable include ordinary course receivables, revenues that were unbilled as of the Petition Date, servicing advance receivables, construction loans receivable, and may also include any net credits in favor of the Debtors with respect to their trade payables. Accounts receivable balances in the Schedules are as of the Petition Date.
- Non-publicly traded stock (AB15). Ownership interests in subsidiaries and other affiliates have been identified in AB15 in an unknown value, as the fair market value of such ownership interest would be difficult to ascertain. Each Debtors' Schedule A/B reflects only those subsidiaries, trusts, and other Debtor entities in which the Debtor has a direct ownership interest. The Debtors have attempted to disclose all entity addresses, however, if no address has been readily available, those fields have been left blank.
- Office Furniture, Fixtures and Equipment (AB38 through AB45). Items listed in AB38-45 are scheduled according to their net book value and valued at estimated liquidation value. The Debtors have made reasonable efforts to identify all assets; however, it is possible that inadvertent errors, misclassifications, or omissions may have occurred, or that property of *de minimis* value is not included in response to this question.
- Machinery, Equipment, and Vehicles (AB46 through AB53). The Debtors do not own any vehicles, machinery or equipment.
- Real Property (AB55 through AB59). FGMC may hold title to certain foreclosed properties behalf of an investor, such as Massachusetts Mutual Life Insurance Company or Teachers Insurance and Annuity Associate of America Bank for whom FGMC serves as servicer, or for an underlying investor such as the Department of Housing and Urban Development ("HUD"), the Department of Agriculture, or the Department of Veteran's Administration. In these instances, FGMC is not the true owner of the property, but instead holds title for the beneficial owner, the investor. Properties for which FGMC holds title not in its own right, but on behalf of a beneficial owner are not included in Schedule AB55. In rare instances, the investor, such as HUD may decline to accept conveyance of the property following foreclosure, reconvey the property to FGMC due to a defect, or FGMC may opt to file a claim with an investor without conveying title in order to subsequently sell such property to a third-party. Such properties are included in Schedule AB55.
- Intangibles and Intellectual Property (AB64). Mortgage Servicing Rights included on AB64 were valued as of June 30, 2022 by SitusAMC. FGMC owes the right to service certain "early buy out loans" purchased out of Ginnie Mae pools and sold to EverBank through a series of transactions from 2016 through 2019. EverBank was subsequently acquired by TIAA Bank. FGMC, through its subservicer, Rushmore Loan Management Services, LLC, services these loans, including the collection of borrower payments. Collections are remitted to TIAA by FGMC on a monthly basis. As of June 29, 2022, the



outstanding unpaid principal balance on these loans totaled \$9,456,500. The value of the servicing right held by FGMC is unknown.

- Intangibles and Intellectual Property (AB60 through AB65). The Debtors have listed all their intangibles and intellectual property on these schedules. The Debtors' value of their registered trademarks, domain names and websites, licenses, and customer lists are all unknown to the Debtor. The only intangible that the Debtors have with a known value is their mortgage servicing rights, which is listed in AB64.
- Notes Receivable (AB71). The Debtors have note receivable balances due to promissory notes secured by a mortgage or deed of trust owned and held for sale by the Debtors.
- Tax Refunds and Unused Net Operating Losses ("NOL") (AB72). The Debtors have yet to file their 2021 tax return. As such, all NOL data is presented based upon their latest filed 2020 tax return. Loss carryforward expiration periods have been considered such that these amounts represent the pre-2021 utilizable NOLs as of 2022. The Debtors listed tax years where the information was known and estimated the dates for certain of the entities. The Debtors' auditor, Richie May & Co, is currently working on the Debtors' 2021 tax return.
- Interests in Insurance Policies (AB73). The Debtor maintains various insurance policies, including as required by law or as specific to the mortgage industry, including automobile insurance, property and casualty insurance, general liability insurance, professional liability insurance, Mortgage Bankers Bond insurance, cyber insurance, fidelity bond insurance and directors and officers insurance. However, none of these insurance policies carry cash value. A list of the Debtors insurance policies and related information is available in the *Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Continue (A) Insurance Programs and (B) Prepetition Surety Bonds, and Pay Obligations Arising Thereunder, and (II) Related Relief (Filed by First Guaranty Mortgage Corporation)* [Docket No. 6].
- Causes of action against third parties (AB74). For loans listed on this schedule where the nature of the claim is "Breach of Contract" or "Equitable Remedies/Unjust Enrichment", the face amount listed under the Amount Requests and Current Value of the Debtor's interest may be lower due to principal payments made over the life of the loan. Rushmore Loan Management Services LLC is FGMC's subservicer and manages foreclosure actions on FGMC's behalf. Where state law provides for foreclosure through a non-judicial process, no case number or court data is associated with such action. Further, where a judicial foreclosure proceeding is uncontested by the borrower(s), Rushmore does not provide FGMC with details of the foreclosure litigation, including case number or court data.
- Other property of any kind not already listed (AB77). Rushmore Loan Management Services LLC manages the claims process with 3rd parties, including governmental agencies. FGMC may have the right to submit additional claims based on loan performance. The ultimate amount paid through the applicable insurance program may

vary from the listed claim amounts. This schedule also lists the Debtors' right to payments from trades not yet completed which are subject to further due diligence and offset, which may change the current value of the Debtors' interest listed herein.

#### **Schedule D Notes.**

- Creditors' claims on Schedule D arose, or were incurred, on various dates. In certain instances, the date on which such claim arose may be an open issue of fact. Except as otherwise agreed in accordance with a stipulation and order entered by the Bankruptcy Court, the Debtors reserve their rights to dispute or challenge the validity, perfection, or immunity from avoidance of any lien listed on Schedule D purported to be granted to a secured creditor or perfected in any specific asset.
- Except as specifically stated herein, lessors of real property and equipment, utility companies, and any other parties which may hold security deposits or other security interests, have not been listed on Schedule D. The Debtors have also not listed on Schedule D any parties whose claims may be secured through rights of setoff, deposits, or advance payments.
- Although the Debtors may have scheduled claims of various creditors as secured claims, the Debtors reserve all rights to dispute or challenge the secured nature of any creditor's claim or the characterization of the structure of any transaction or any document or instrument (including, without limitation, any intercompany agreement) related to such creditor's claim.
- The Debtors have not included on Schedule D the claims of any parties that may believe their claims are secured through setoff rights or inchoate statutory lien rights. The amounts outstanding under the Debtors' prepetition secured debt reflect the approximate principal amounts and accrued interest as of the Petition Date.
- The descriptions provided on Schedule D are intended only as a summary. Reference to the applicable loan agreements and related documents is necessary for a complete description of the collateral and the nature, extent and priority of any liens. Nothing in these Global Notes or in the Schedules and Statements shall be deemed a modification, interpretation or an acknowledgment of the terms of such agreements or related documents.

#### **Schedule E/F Notes.**

- The Debtors have made reasonable efforts to report all priority and general unsecured claims against the Debtors on Schedule E/F based on the Debtors' books and records as of the Petition Date. However, the actual value of claims against the Debtors may vary significantly from the represented liabilities. Certain claims on E/F may have been satisfied post-petition by FGMC or 3<sup>rd</sup> parties. Parties in interest should not accept that the listed liabilities necessarily reflect the correct amount of any unsecured creditor's allowed claims or the correct amount of all unsecured claims. Similarly, parties in interest should not anticipate that recoveries in these cases will reflect the relationship of the aggregate asset

values and aggregate liabilities set forth in the Schedules. Parties in interest should consult their own professionals and advisors with respect to pursuing a claim. Although the Debtors and their professionals have generated financial information and data the Debtors believe to be reasonable, actual liabilities (and assets) may deviate significantly from the Schedules due to certain events that occur throughout these Chapter 11 Cases.

- The claims listed on Schedule E/F arose or were incurred on various dates. In certain instances, the date on which a claim arose may be unknown or subject to dispute. Although reasonable efforts have been made to determine the date upon which claims listed in Schedule E/F were incurred or arose, updating that date for each claim in Schedule E/F would be unduly burdensome and cost-prohibitive and, therefore, the Debtors have not listed a date for each claim listed on Schedule E/F.
- The Bankruptcy Court has authorized the Debtors to pay, in whole or in part, prepetition claims relating to the Debtors' employee wages and compensation, benefits, and reimbursable business expenses. Accordingly, a Debtor's Schedule E/F reflects those employee related claims due and owing as of the Petition Date whether they have been ultimately satisfied by the First Day Motions. Undisclosed employee reimbursements have not been captured in the Debtors' Schedules.
- Schedule E/F also contains information regarding certain litigation creditors involving the Debtors. However, certain omissions may have occurred. The inclusion of any judgement value in the Schedules and Statements does not constitute an admission by the Debtors of any liability.
- Certain litigations reflected as claims for or against one Debtor may relate to one or more of the other Debtors. The Debtors have made commercially reasonable efforts to record these actions in the Schedules and Statements of each Debtor that is party to the action. Moreover, given the number of litigations involving Debtors, the Schedules do not contain specific details of every litigation, such as the names and addresses of each party to a given litigation.
- In the ordinary course of business, the Debtors generally receive invoices for goods and services after the delivery of such goods or services. As of the filing of the Schedules and Statements, the Debtors have not received all invoices for payables, expenses, or liabilities that may have accrued before the Petition Date. Furthermore, payments to vendors and lienholders made subsequent to the filing of these Schedules will not be reflected in these Schedules. The Debtors reserve the right, but are not required, to amend Schedules E/F if they receive such invoices and/ or make such payments. The claims of individual creditors are generally listed at the amounts recorded on the Debtors' books and records and may not reflect all credits or allowances due from the creditor. The Debtors reserve all of their rights concerning credits or allowances.
- Schedule E/F: The claim amounts listed for promissory notes may not reflect the applicable repurchase price. In addition, the date listed is the approximate date that FGMC became

aware of the repurchase demand and may differ from the date of a formal repurchase demand.

- On Schedule E/F, Part 1, the amounts owed to certain taxing authorities for 2021 are still unknown as 2021 Tax Returns have not been completed by the Debtors' auditor, Richey May & Co.
- Schedule E/F: The amount of certain claims based on outstanding interest rate swaps as of the Petition Date may have been liquidated post-petition by interest rate swap participants or financial institutions without violating the automatic stay. *See* 11 U.S.C.A. § 362(b)(17).

#### **Schedule G Notes.**

- The Debtors hereby reserve all rights to dispute the validity, status, or enforceability of any contracts, agreements or leases set forth in Schedule G and to amend or supplement Schedule G as necessary. Additionally, the placing of a contract or lease onto Schedule G shall not be deemed an admission that such contract is an executory contract or unexpired lease, or that it is necessarily a binding, valid, and enforceable contract. Any and all of the Debtors' rights, claims and causes of action with respect to the contracts and agreements listed on Schedule G are hereby reserved and preserved. In addition, the Debtors are continuing their review of all relevant documents and expressly reserve their right to amend all Schedules at a later time as necessary and/or to challenge the classification of any agreement as an executory contract or unexpired lease in any appropriate filing.
- In some cases, the same contract counterparty appears multiple times in a Debtor's Schedule G. This multiple listing is generally intended to reflect distinct agreements between the applicable Debtor and such counterparty, however, due to the magnitude of data, it is possible that a multiple listing may be the result of duplicates. As part of Schedule G, the Debtors made best efforts to include executory contracts and all supporting documents (e.g. amendments) to executory contracts listing.
- Omission of a contract or agreement from Schedule G does not constitute an admission that such omitted contract or agreement is not an executory contract or unexpired lease. The Debtors' rights under the Bankruptcy Code with respect to any such omitted contracts or agreements are not impaired by the omission. A Debtor's Schedule G may be amended at any time to add or remove, as the case may be, any omitted contract, agreement, or lease.
- The contracts, agreements, and leases listed on Schedule G may have expired or may have been rejected, terminated, assigned, modified, amended, and/or supplemented from time to time by various amendments, change orders, restatements, waivers, estoppel certificates, letters, and other documents, instruments, and agreements that may not be listed therein or that may be listed as a single entry. The Debtors expressly reserve their rights to challenge whether such related materials constitute an executory contract, a single contract or agreement, or multiple, severable, or separate contracts.

- Certain of the leases listed on Schedule G may contain renewal options, options to purchase, rights of first refusal, and other miscellaneous rights. Such rights, powers, duties, and obligations are not set forth on Schedule G. Certain of the agreements listed on Schedule G may also be in the nature of conditional sales agreements or secured financings, and their inclusion on Schedule G is not an admission that the agreement is an executory contract, financing agreement, or otherwise.
- Certain of the contracts, agreements, and leases listed on Schedule G may have been entered into by more than one of the Debtors. Further, in certain instances, the specific Debtor obligor to certain of the executory contracts could not be specifically ascertained. In such cases, the Debtors have made their best efforts to determine the correct Debtors' Schedule G on which to list such executory contract.

#### **Schedule H Notes.**

- In the ordinary course of their businesses, the Debtors may be involved in pending or threatened litigation and claims. These matters may involve multiple plaintiffs and defendants, some or all of whom may assert cross-claims and counterclaims against other parties. Not all claims may have been set forth individually on Schedule H.

### **Statement of Financial Affairs**

**Statement Question 1 and 2 – Revenue.** Revenues are based on the allocable revenue to each of the Debtor entities.

**Statement Question 4 – Payments to Insiders.** The response to Question 4 contains the full list of regular compensation, bonuses, severance, and expense reimbursements made to insiders by the Debtor entities during the one year preceding the Petition Date.

**Statement Question 7 – Legal Actions.** The Debtors have made reasonable best efforts to identify all current pending litigation involving the Debtors; however, to the extent there have been omissions the Debtors will update accordingly. There are two matters that are under seal included in this schedule. In addition, the names of employees were redacted with respect to their EEOC claims.

**Statement Question 9 – Certain Gifts and Charitable Contributions.** The Debtors have charitable contributions to Court Appointed Special Advocates (CASA) to disclose in the time frame of a material value. There may have been additional gifts of lesser values, of which the Debtors do not keep any records.

**Statement Question 13 – Transfers of Other Property.** FGMC, the sole member of Maverick II Holdings LLC, ("Maverick"), transferred the sums of \$75,000 and \$125,000 to RM Title LLC on behalf of Maverick in relation to Maverick's acquisition of a 50% membership interest in FirstLine Holdings LLC, the sole member of FirstLine Title LLC.

**Statement Question 16 – Personally Identifiable Information.** In the ordinary course of business in connection with their origination and servicing businesses, the Debtors collect certain personally identifiable information (“PII”), including but not limited to, their customers’ names, home address, social security numbers, bank accounts, date of birth, income, assets, employment, and credit information. The Debtors maintain a privacy policy regarding the use of PII.

**Statement Question 17 – ERISA Plan as an Employee Benefit.** FGMC sponsors 401(k) plans for their employees.

**Statement Question 20 – Off-Premises Storage.** The Debtors listed off-premises storage of archived documents. The appropriate employees are provided with access to that facility as per the Debtors’ policies.

**Statement Question 21 – Property Held for Another.** The Debtors routinely transfer property, including money, borrower escrows, principal and interest payments on behalf of sub-servicers on behalf of investors, title to properties, and mortgage servicing rights in the ordinary course of business. SOFA 21 includes escrows, funds, and collateral files, and other property that is owned by other entities / third parties but was held by the Debtors as of the filing date.

**Statement Question 25 – Businesses in Which the Debtors Have an Interest.** FGMC has a 100% interest in Maverick II Holdings, LLC.

**Statement Question 26a – List all accountants and bookkeepers who maintained the debtor's books.** The employees with dates of service listed as “Present” were employed by the Debtor as of the Petition Date. Since the Petition Date, some of these employees may no longer be employees of the Debtor.

**Statement Question 26b – List firms or individuals who have audited, compiled, or reviewed the Debtors’ books of account and records or prepared financial statements within 2 years before filing this case.** For Maverick II Holdings, LLC, there has been no financial activity and thus no books of account or records to audit, compile or review. The acquisition of FirstLine Title was facilitated by funds that came from FGMC.

**Statement Question 26c – Firms or Individuals in Possession of Debtors’ Books of Account and Records.** Other third parties besides those listed may possess a subset of the Debtors’ books and records but are not included in the Debtors’ responses to Statement Question 26c.

**Statement Question 26d – Recipients of Financial Statements.** Due to the nature of the FGMC’s business, FGMC frequently provides financial statements to counterparties, regulators, governmental agencies, warehouse lenders, financial institutions, insurance brokers, insurance companies, correspondent lenders, and others. FGMC believes it has provided one or more financial statements to the parties listed in the two-year period prior to filing. Due to the volume of requests for financial statements across the various channels of FGMC’s business, this list may not be inclusive; however, the list is largely representative of the parties to whom FGMC provided a copy of its financial statements. In addition, there is one entity name included but under seal in the schedule.

**Statement Question 28 and 29 – Current and Former Officer and Directors.** While the Debtors have made reasonable best efforts to list all current officers, directors and beneficial owners, and their interest in the applicable Debtor, for each Debtor in response to Statement Questions 28 and 29, some may have been omitted.

**Statement Question 30 – Payments, Distributions, or Withdrawals to Insiders.** Refer to Statement Question 4 for this item.

**Statement Question 31 – Consolidated Group for Tax Purposes.** Maverick II Holdings, LLC was formed in 2021. This entity will be a part of the FGMC tax group filing. The Debtors' 2021 Tax Return has yet to be filed by the Debtors' auditor, Richie May & Co.

Dated: August 29, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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*Counsel for Debtors and Debtors in Possession*

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing**Official Form 206Sum****Summary of Assets and Liabilities for Non-Individuals****12/15****Part 1: Summary of Assets****1. Schedule A/B: Assets—Real and Personal Property** (Official Form 206A/B)**1a. Real property:**Copy line 88 from *Schedule A/B* .....

\$ 0.00

**1b. Total personal property:**Copy line 91A from *Schedule A/B* .....

\$ 200,000.00

**1c. Total of all property:**Copy line 92 from *Schedule A/B* .....

\$ 200,000.00

**Part 2: Summary of Liabilities****2. Schedule D: Creditors Who Have Claims Secured by Property** (Official Form 206D)Copy the total dollar amount listed in Column A, *Amount of claim*, from line 3 of *Schedule D* .....

\$ 0.00

**3. Schedule E/F: Creditors Who Have Unsecured Claims** (Official Form 206E/F)**3a. Total claim amounts of priority unsecured claims:**Copy the total claims from Part 1 from line 5a of *Schedule E/F* .....

\$ 0.00

**3b. Total amount of claims of nonpriority amount of unsecured claims:**Copy the total of the amount of claims from Part 2 from line 5b of *Schedule E/F* .....

+ \$ 0.00

**4. Total liabilities**

Lines 2 + 3a + 3b .....

\$ 0.00



**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing

## Official Form 206A/B

**Schedule A/B: Assets - Real and Personal Property**

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on Schedule G: Executory Contracts and Unexpired Leases (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

**Part 1: Cash and cash equivalents**

## 1. Does the debtor have any cash or cash equivalents?

- ☒ No. Go to Part 2.  
☐ Yes. Fill in the information below.

All cash or cash equivalents owned or controlled by the debtor

Current value of debtor's interest

## 2. Cash on hand

\$ \_\_\_\_\_

## 3. Checking, savings, money market, or financial brokerage accounts (Identify all)

Name of institution (bank or brokerage firm) Type of account Last 4 digits of account number

\$ \_\_\_\_\_

## 4. Other cash equivalents (Identify all)

\$ \_\_\_\_\_

## 5. Total of Part 1

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

\$ 0.00

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name

**Part 2: Deposits and prepayments****6. Does the debtor have any deposits or prepayments?**

- ☒ No. Go to Part 3.
- ☐ Yes. Fill in the information below.

Current value of debtor's interest

**7. Deposits, including security deposits and utility deposits**

Description, including name of holder of deposit

\$ \_\_\_\_\_

**8. Prepayments, including prepayments on executory contracts, leases, insurance, taxes, and rent**

Description, including name of holder of prepayment

\$ \_\_\_\_\_

**9. Total of Part 2.**

Add lines 7 through 8. Copy the total to line 81.

\$ _____	0.00
----------	------

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name

**Part 3: Accounts receivable****10. Does the debtor have any accounts receivable?**

- ☒ No. Go to Part 4.
- ☐ Yes. Fill in the information below.

**Current value of debtor's interest****11. Accounts receivable**

	Description	face amount	doubtful or uncollectible accounts		
11a.	90 days old or less:	<u>                    </u>	\$ <u>                    </u>	- \$ <u>                    </u>	=..... → \$ <u>                    </u>
11b.	Over 90 days old:	<u>                    </u>	\$ <u>                    </u>	- \$ <u>                    </u>	=..... → \$ <u>                    </u>

**12. Total of Part 3.**

Current value on lines 11a + 11b = line 12. Copy the total to line 82.

\$                      0.00

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name

**Part 4: Investments****13. Does the debtor own any investments?**

- ☐ No. Go to Part 5.
- ☒ Yes. Fill in the information below.

Valuation method used  
for current value

Current value of debtor's interest

**14. Mutual funds or publicly traded stocks not included in Part 1**

Name of fund or stock:

14.1 None \$ \_\_\_\_\_**15. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including any interest in an LLC, partnership, or joint venture**

Name of entity:

% of ownership:

15.1 FirstLine Holding Company 50% Fair Market Value \$ 200,000.00**16. Government bonds, corporate bonds, and other negotiable and non-negotiable instruments not included in Part 1**

Describe:

16.1 None \$ \_\_\_\_\_**17. Total of Part 4.**

Add lines 14 through 16. Copy the total to line 83.

\$ 200,000.00

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name \_\_\_\_\_

**Part 5: Inventory, excluding agriculture assets****18. Does the debtor own any inventory (excluding agriculture assets)?**

- ☒ No. Go to Part 6.  
☐ Yes. Fill in the information below.

General description	Date of the last physical inventory	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
19. Raw materials		\$		\$
20. Work in progress		\$		\$
21. Finished goods, including goods held for resale		\$		\$
22. Other inventory or supplies		\$		\$

**23. Total of Part 5.**

Add lines 19 through 22. Copy the total to line 84.

\$	0.00
----	------

**24. Is any of the property listed in Part 5 perishable?**

- ☐ No  
☐ Yes

**25. Has any of the property listed in Part 5 been purchased within 20 days before the bankruptcy was filed?**

- ☐ No  
☐ Yes. Description \_\_\_\_\_ Book value \$ \_\_\_\_\_ Valuation method \_\_\_\_\_ Current value \$ \_\_\_\_\_

**26. Has any of the property listed in Part 5 been appraised by a professional within the last year?**

- ☐ No  
☐ Yes

Debtor: Maverick II Holdings, LLC

Case number (if known): 22-10583

Name

**Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)**

27. Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?

- ☒ No. Go to Part 7.
- ☐ Yes. Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
28. Crops—either planted or harvested	\$		\$
29. Farm animals <i>Examples:</i> Livestock, poultry, farm-raised fish	\$		\$
30. Farm machinery and equipment (Other than titled motor vehicles)	\$		\$
31. Farm and fishing supplies, chemicals, and feed	\$		\$
32. Other farming and fishing-related property not already listed in Part 6	\$		\$

33. Total of Part 6.

Add lines 28 through 32. Copy the total to line 85.

\$ 0.00

34. Is the debtor a member of an agricultural cooperative?

- ☐ No
- ☐ Yes. Is any of the debtor's property stored at the cooperative?
- ☐ No
- ☐ Yes

35. Has any of the property listed in Part 6 been purchased within 20 days before the bankruptcy was filed?

- ☐ No
- ☐ Yes. Description \_\_\_\_\_ Book value \$ \_\_\_\_\_ Valuation method \_\_\_\_\_ Current value \$ \_\_\_\_\_

36. Is a depreciation schedule available for any of the property listed in Part 6?

- ☐ No
- ☐ Yes

37. Has any of the property listed in Part 6 been appraised by a professional within the last year?

- ☐ No
- ☐ Yes

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name \_\_\_\_\_

**Part 7: Office furniture, fixtures, and equipment; and collectibles**

38. Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?

- ☒ No. Go to Part 8.
- ☐ Yes. Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
39. <b>Office furniture</b>			
_____	\$ _____	_____	\$ _____
40. <b>Office fixtures</b>			
_____	\$ _____	_____	\$ _____
41. <b>Office equipment, including all computer equipment and communication systems equipment and software</b>			
_____	\$ _____	_____	\$ _____
42. <b>Collectibles</b> <i>Examples:</i> Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; china and crystal; stamp, coin, or baseball card collections; other collections, memorabilia, or collectibles			
_____	\$ _____	_____	\$ _____

43. **Total of Part 7.**

Add lines 39 through 42. Copy the total to line 86.

\$ \_\_\_\_\_ 0.00

44. Is a depreciation schedule available for any of the property listed in Part 7?

- ☐ No
- ☐ Yes

45. Has any of the property listed in Part 7 been appraised by a professional within the last year?

- ☐ No
- ☐ Yes

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name \_\_\_\_\_

**Part 8: Machinery, equipment, and vehicles**

46. Does the debtor own or lease any machinery, equipment, or vehicles?

- ☒ No. Go to Part 9.
- ☐ Yes. Fill in the information below.

General description	Net book value of debtor's interest	Valuation method used for current value	Current value of debtor's interest
Include year, make, model, and identification numbers (i.e., VIN, HIN, or N-number)	(Where available)		

47. **Automobiles, vans, trucks, motorcycles, trailers, and titled farm vehicles**

\_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

48. **Watercraft, trailers, motors, and related accessories** Examples: Boats, trailers, motors, floating homes, personal watercraft, and fishing vessels

\_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

49. **Aircraft and accessories**

\_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

50. **Other machinery, fixtures, and equipment (excluding farm machinery and equipment)**

\_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

51. **Total of Part 8.**

Add lines 47 through 50. Copy the total to line 87.

\$ \_\_\_\_\_ 0.00

52. **Is a depreciation schedule available for any of the property listed in Part 8?**

- ☐ No
- ☐ Yes

53. **Has any of the property listed in Part 8 been appraised by a professional within the last year?**

- ☐ No
- ☐ Yes



Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name

**Part 9: Real property****54. Does the debtor own or lease any real property?**

- ☒ No. Go to Part 10.
- ☐ Yes. Fill in the information below.

**55. Any building, other improved real estate, or land which the debtor owns or in which the debtor has an interest**

Description and location of property	Nature and extent of debtor's interest in property	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
Include street address or other description such as Assessor Parcel Number (APN), and type of property (for example, acreage, factory, warehouse, apartment or office building), if available.				
55.1 _____		\$ _____		\$ _____

**56. Total of Part 9.**

Add the current value on lines 55.1 through 55.6 and entries from any additional sheets. Copy the total to line 88.

\$ 0.00**57. Is a depreciation schedule available for any of the property listed in Part 9?**

- ☐ No
- ☐ Yes

**58. Has any of the property listed in Part 9 been appraised by a professional within the last year?**

- ☐ No
- ☐ Yes

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name

**Part 10: Intangibles and intellectual property**

59. Does the debtor have any interests in intangibles or intellectual property?

- ☒ No. Go to Part 11.
- ☐ Yes. Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
60. Patents, copyrights, trademarks, and trade secrets	\$		\$
61. Internet domain names and websites	\$		\$
62. Licenses, franchises, and royalties	\$		\$
63. Customer lists, mailing lists, or other compilations	\$		\$
64. Other intangibles, or intellectual property	\$		\$
65. Goodwill	\$		\$

66. Total of Part 10.

Add lines 60 through 65. Copy the total to line 89.

\$ 0.00

67. Do your lists or records include personally identifiable information of customers (as defined in 11 U.S.C. §§ 101(41A) and 107)?

- ☐ No
- ☐ Yes

68. Is there an amortization or other similar schedule available for any of the property listed in Part 10?

- ☐ No
- ☐ Yes

69. Has any of the property listed in Part 10 been appraised by a professional within the last year?

- ☐ No
- ☐ Yes

Debtor: Maverick II Holdings, LLC

Case number (if known): 22-10583

Name

**Part 11: All other assets****70. Does the debtor own any other assets that have not yet been reported on this form?**

Include all interests in executory contracts and unexpired leases not previously reported on this form.

- ☒ No. Go to Part 12.
- ☐ Yes. Fill in the information below.

**Current value of debtor's interest****71. Notes receivable**

Description (include name of obligor)	Total face amount	doubtful or uncollectible accounts	
_____	\$ _____	- \$ _____	=..... → \$ _____

**72. Tax refunds and unused net operating losses (NOLs)**

Description (for example, federal, state, local)	—	Tax year	\$ _____
_____		_____	

**73. Interests in insurance policies or annuities**

_____	\$ _____
-------	----------

**74. Causes of action against third parties (whether or not a lawsuit has been filed)**

_____	\$ _____
Nature of claim	_____
Amount requested	\$ _____

**75. Other contingent and unliquidated claims or causes of action of every nature, including counterclaims of the debtor and rights to set off claims**

_____	\$ _____
Nature of claim	_____
Amount requested	\$ _____

**76. Trusts, equitable or future interests in property**

_____	\$ _____
-------	----------

**77. Other property of any kind not already listed** Examples: Season tickets, country club membership

_____	\$ _____
-------	----------

**78. Total of Part 11.**

Add lines 71 through 77. Copy the total to line 90.

\$ _____ 0.00
---------------

**79. Has any of the property listed in Part 11 been appraised by a professional within the last year?**

- ☐ No
- ☐ Yes

Debtor: Maverick II Holdings, LLCCase number (if known): 22-10583

Name \_\_\_\_\_

**Part 12: Summary**

In Part 12 copy all of the totals from the earlier parts of the form.

Type of property	Current value of personal property	Current value of real property
80. <b>Cash, cash equivalents, and financial assets.</b> <i>Copy line 5, Part 1.</i>	\$ 0.00	
81. <b>Deposits and prepayments.</b> <i>Copy line 9, Part 2.</i>	\$ 0.00	
82. <b>Accounts receivable.</b> <i>Copy line 12, Part 3.</i>	\$ 0.00	
83. <b>Investments.</b> <i>Copy line 17, Part 4.</i>	\$ 200,000.00	
84. <b>Inventory.</b> <i>Copy line 23, Part 5.</i>	\$ 0.00	
85. <b>Farming and fishing-related assets.</b> <i>Copy line 33, Part 6.</i>	\$ 0.00	
86. <b>Office furniture, fixtures, and equipment; and collectibles.</b> <i>Copy line 43, Part 7.</i>	\$ 0.00	
87. <b>Machinery, equipment, and vehicles.</b> <i>Copy line 51, Part 8.</i>	\$ 0.00	
88. <b>Real property.</b> <i>Copy line 56, Part 9.....</i> →		\$ 0.00
89. <b>Intangibles and intellectual property.</b> <i>Copy line 66, Part 10.</i>	\$ 0.00	
90. <b>All other assets.</b> <i>Copy line 78, Part 11.</i>	\$ 0.00	
91. <b>Total.</b> Add lines 80 through 90 for each column.....91a.	\$ 200,000.00	\$ 0.00
92. <b>Total of all property on Schedule A/B.</b> Lines 91a + 91b = 92. ....		\$ 200,000.00

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing**Official Form 206D****Schedule D: Creditors Who Have Claims Secured by Property**

12/15

Be as complete and accurate as possible.

**1. Do any creditors have claims secured by debtor's property?**

- ☒ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.
- ☐ Yes. Fill in all of the information below.

**Part 1: List Creditors Who Have Secured Claims****2. List in alphabetical order all creditors who have secured claims.** If a creditor has more than one secured claim, list the creditor separately for each claim.

*Column A*  
**Amount of claim**  
 Do not deduct the value of collateral.

*Column B*  
**Value of collateral that supports this claim**

**2.1 Creditor's name**

Describe debtor's property that is subject to a lien

\$ \_\_\_\_\_ \$ \_\_\_\_\_

Creditor's Name

**Creditor's mailing address**

Describe the lien

Notice Name

Street

**Is the creditor an insider or related party?**

- ☐ No
- ☐ Yes

City

State

ZIP Code

Country

**Is anyone else liable on this claim?**

- ☐ No
- ☐ Yes. Fill out *Schedule H: Codebtors*(Official Form 206H).

**Date debt was incurred****Last 4 digits of account number****As of the petition filing date, the claim is:**

Check all that apply.

- ☐ Contingent
- ☐ Unliquidated
- ☐ Disputed

**Do multiple creditors have an interest in the same property?**

- ☐ No
- ☐ Yes. Have you already specified the relative priority?
- ☐ No. Specify each creditor, including this creditor, and its relative priority.
- ☐ Yes. The relative priority of creditors is specified on lines \_\_\_\_\_

**3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.**

\$ \_\_\_\_\_

**Part 2:** List Others to Be Notified for a Debt Already Listed in Part 1

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address	On which line in Part 1 did you enter the related creditor?	Last 4 digits of account number for this entity
<div>Name</div>	<div>Line</div>	
<div>Notice Name</div>		
<div>Street</div>		
<div>City</div>		<div>State</div>
<div>Country</div>		<div>ZIP Code</div>

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing

## Official Form 206E/F

**Schedule E/F: Creditors Who Have Unsecured Claims**

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY unsecured claims and Part 2 for creditors with NONPRIORITY unsecured claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on Schedule A/B: Assets - Real and Personal Property (Official Form 206A/B) and on Schedule G: Executory Contracts and Unexpired Leases (Official Form 206G). Number the entries in Parts 1 and 2 in the boxes on the left. If more space is needed for Part 1 or Part 2, fill out and attach the Additional Page of that Part included in this form.

**Part 1:** List All Creditors with PRIORITY Unsecured Claims

## 1. Do any creditors have priority unsecured claims? (See 11 U.S.C. § 507).

- ☒ No. Go to Part 2.  
☐ Yes. Go to Line 2.

2. List in alphabetical order all creditors who have unsecured claims that are entitled to priority in whole or in part. If the debtor has more than 3 creditors with priority unsecured claims, fill out and attach the Additional Page of Part 1.

Total claim	Priority amount
-------------	-----------------

## 2.1 Priority creditor's name and mailing address

As of the petition filing date, the claim is: \$

Check all that apply.

Creditor Name

☐ Contingent

Creditor's Notice name

☐ Unliquidated☐ Disputed

Address

Basis for the claim:

City

State

ZIP Code

Country

Date or dates debt was incurred

Last 4 digits of account number

Specify Code subsection of PRIORITY unsecured

claim: 11 U.S.C. § 507(a) ()

Is the claim subject to offset?

- ☐ No  
☐ Yes

**Part 2: List All Creditors with NONPRIORITY Unsecured Claims**

3. List in alphabetical order all of the creditors with nonpriority unsecured claims. If the debtor has more than 6 creditors with nonpriority unsecured claims, fill out and attach the Additional Page of Part 2.

Nonpriority creditor's name and mailing address			Amount of claim
Creditor Name _____  Creditor's Notice name _____  Address _____ _____ _____  City _____ State _____ ZIP Code _____  Country _____			As of the petition filing date, the claim is: \$ _____ <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <b>Basis for the claim:</b> _____  <b>Date or dates debt was incurred</b> _____  <b>Last 4 digits of account number</b> _____
			<b>Is the claim subject to offset?</b> <input type="checkbox"/> No <input type="checkbox"/> Yes



**Part 3:** List Others to Be Notified About Unsecured Claims

4. List in alphabetical order any others who must be notified for claims listed in Parts 1 and 2. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for unsecured creditors. If no others need to be notified for the debts listed in Parts 1 and 2, do not fill out or submit this page. If additional pages are needed, copy the next page.

Name and mailing address

On which line in Part 1 or Part 2 is the related creditor (if any) listed?

Last 4 digits of account number, if any

Name

Line

☐ Not Listed.Explain

Notice Name

Street

City

State

ZIP Code

Country

**Part 4:** Total Amounts of the Priority and Nonpriority Unsecured Claims

---

5. Add the amounts of priority and nonpriority unsecured claims.

5a. Total claims from Part 1

	Total of claim amounts
5a.	\$ 0.00

5b. Total claims from Part 2

5b. +	\$ 0.00
-------	---------

5c. Total of Parts 1 and 2

Lines 5a + 5b = 5c.

5c.	\$ 0.00
-----	---------

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing**Official Form 206G****Schedule G: Executory Contracts and Unexpired Leases****12/15**

Be as complete and accurate as possible. If more space is needed, copy and attach the additional page, numbering the entries consecutively.

**1. Does the debtor have any executory contracts or unexpired leases?**

- ☒ No. Check this box and file this form with the court with the debtor's other schedules. There is nothing else to report on this form.
- ☐ Yes. Fill in all of the information below even if the contracts or leases are listed on *Schedule A/B: Assets - Real and Personal Property* (Official Form 206A/B).

**2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease****State what the contract or lease is for and the nature of the debtor's interest**

Name

Notice Name

**State the term remaining**

Address

**List the contract number of any government contract**

City

State

ZIP Code

Country

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

☐ Check if this is an amended filing**Official Form 206H****Schedule H: Codebtors****12/15**

Be as complete and accurate as possible. If more space is needed, copy the Additional Page, numbering the entries consecutively. Attach the Additional Page to this page.

**1. Does the debtor have any codebtors?**

- ☒ No. Check this box and submit this form to the court with the debtor's other schedules. Nothing else needs to be reported on this form.
- ☐ Yes

**2. In Column 1, list as codebtors all of the people or entities who are also liable for any debts listed by the debtor in the schedules of creditors, Schedules D-G. Include all guarantors and co-obligors. In Column 2, identify the creditor to whom the debt is owed and each schedule on which the creditor is listed. If the codebtor is liable on a debt to more than one creditor, list each creditor separately in Column 2.**

Column 1: Codebtor		Column 2: Creditor	
Name	Mailing address	Name	Check all schedules that apply:
2.1	Street		<input type="checkbox"/> D
			<input type="checkbox"/> E/F
			<input type="checkbox"/> G
	City State ZIP Code		
	Country		

**Fill in this information to identify the case:**

Debtor Name: In re : Maverick II Holdings, LLC

United States Bankruptcy Court for the: District of Delaware

Case number (if known): 22-10583 (CTG)

**Official Form 202****Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☒ *Schedule A/B: Assets--Real and Personal Property* (Official Form 206A/B)
- ☒ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☒ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☒ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☒ *Schedule H: Codebtors* (Official Form 206H)
- ☒ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ Amended Schedule \_\_\_\_\_
- ☐ Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders (Official Form 204)
- ☐ Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 08/29/2022

MM / DD / YYYY

✕



Signature of individual signing on behalf of debtor

Aaron Samples

Printed name

Authorized Signatory

Position or relationship to debtor