

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

	)				
In re:	)				Chapter 11
	)				
FIRST GUARANTY MORTGAGE	)				Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , <sup>1</sup>	)				
	)				(Jointly Administered)
Debtors.	)				
	)				

**AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON  
JULY 28, 2022 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

**ALL MATTERS ARE ADJOURNED TO AUGUST 2, 2022 AT 10:00 A.M. (ET)**

**AS NO MATTERS ARE GOING FORWARD, THE HEARING  
HAS BEEN CANCELLED WITH THE COURT’S PERMISSION.**

**UNCONTESTED MATTERS WITH CNO OR COC:**

1. 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: 6/30/2022] (Docket No. [6](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time).

**Responses Received**

- A. None

**Related Documents**

- A. Interim Order Granting 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 [Signed: 7/1/2022] (Docket No. [62](#)).

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, 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.

<sup>2</sup> Amended items are noted in bold.



- B. Notice of Entry of Interim Order and Final Hearing Regarding 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: 7/5/2022] (Docket No. [78](#)).
- C. Certificate of No Objection [Filed 7/26/2022] (Docket No. [202](#)).
- D. Final Order Granting Motion of 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 [Signed 7/26/2022] (Docket No. [206](#)).**

**Status:** An order has been entered.

- 2. Motion of the Debtors Pursuant to 11 U.S.C. §§ f 105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (A) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 6/30/2022] (Docket No. [8](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time).

**Responses Received**

None.

**Related Documents**

- A. Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Signed: 7/1/2022] (Docket No. [63](#)).
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of the Debtors Pursuant to 11 U.S.C. §§105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 7/5/2022] (Docket No. [80](#)).
- C. Certificate of No Objection [Filed 7/25/2022] (Docket No. [197](#)).
- D. Final Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from**

**Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Signed 7/26/2022] (Docket No. [205](#)).**

**Status:** An order has been entered.

3. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date [Filed: 7/7/2022] (Docket No. [94](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. Informal comments from the Office of the United States Trustee.

**Related Documents**

- A. Certification of Counsel [Filed 7/26/2022] (Docket No. [211](#))

**Status:** A Certification of Counsel has been filed. Unless the Court has any questions, no hearing is necessary.

4. Debtors' Motion for an Order (I) Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs, and (II) Granting Related Relief (Filed 7/14/2022) [D.I. [134](#)].

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. None.

**Related Documents**

- A. Certificate of No Objection [Filed 7/26/2022] (Docket No. [210](#))

**Status:** A Certificate of No Objection has been filed. Unless the Court has any questions, no hearing is necessary.

5. Debtors' Application for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Debtors Effective as of the Petition Date [Filed: 7/7/2022] (Docket No. [92](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

A. Informal comments from the Office of the United States Trustee.

**Related Documents**

A. **Supplemental Declaration of Laura Davis Jones in Support of Debtors' Application for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Debtors Effective as of the Petition Date [Filed 7/26/2022] (Docket No. [213](#)).**

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET). The Debtors expect to file a Certification of Counsel prior to the hearing.**

6. Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Dentons as Counsel for the Debtors and Debtors-in-Possession Effective as of the Petition Date [Filed: 7/7/2022] (Docket No. [93](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

A. Informal comments from the Office of the United States Trustee.

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET). The Debtors expect to file a supplemental declaration and a Certification of Counsel prior to the hearing.**

7. Debtors' Motion for an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed: 7/7/2022] (Docket No. [95](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

A. None.

**Related Documents**

A. **Certificate of No Objection [Filed 7/26/2022] (Docket No. [214](#)).**

**Status: A Certificate of No Objection has been filed. Unless the Court has any questions, no hearing is necessary.**

8. Debtors' Motion for Entry of Order (I) Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [Filed 7/14/2022] (Docket No. [135](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. Informal comments from the Office of the United States Trustee.

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET). The Debtors expect to file a Certification of Counsel prior to the hearing.**

**CONTESTED MATTERS:**

9. Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief [Filed: 6/30 /2022] (Docket No. [5](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to **July 27, 2022 at 10:00 a.m.** (Prevailing Eastern Time) for Customers Bank, Texas Capital Bank, Flagstar Bank, FSB and GNMA; to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors and to July 27, 2022 at 12:00 noon (Prevailing Eastern Time) for Freddie Mac).

**Responses Received**

- A. Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#)).
- B. Flagstar Bank, FSB's Preliminary Objection to Debtors' Financing Motions and Cash Management Motion [Filed: 7/1/2022] (Docket No. [40](#)).
- C. Creditor South Street Securities LLC's Reservation of Rights to Debtors' Financing Motions and Cash Management Motion [Filed 7/25/2022] (Docket No. [195](#)).

- D. **Response and Reservation of Rights the Federal National Mortgage Association Related to (I) the Debtors' Cash Management Motion, (II) the Debtors' Cash Flow DIP Motion, (III) the Debtors' DIP Repo Motion, and (IV) Customers Bank's Cash Collateral Motion [Filed 7/27/2022] (Docket No. [215](#)).**
- E. **Flagstar Bank, FSB's Limited Objection and Reservation of Rights Regarding Certain Second Day Motions and Joinder to Customer Bank's 363(c)(4) Motion [Filed 7/27/2022] (Docket No. [216](#)).**
- F. **Customers Banks Reservation of Rights Regarding the Debtors (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed 7/27/2022] (Docket No. [217](#)).**

**Related Documents**

- A. Order Granting, On an Interim Basis, Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief [Signed: 7/1/2022] (Docket No. [61](#)).
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief [Filed: 7/5/2022] (Docket No. [77](#)).
- C. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET).**

- 10. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Filed: 6/30/2022] (Docket No. [7](#))

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. Limited Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Interim and Final orders Authorizing Debtors to Pay Prepetition Claims of Critical Vendors [Filed 7/25/2022] (Docket No. [200](#)).

**Related Documents**

- A. Interim Order (A) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Signed: 7/1/2022] (Docket No. [65](#)).
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Filed: 7/5/2022] (Docket No. [79](#)).
- C. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET).**

- 11. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief [Filed 6/30/2022] (Docket No. [9](#))

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. Limited Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Interim and Final orders Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs [Filed 7/25/2022] (Docket No. [201](#)).

**Related Documents**

- A. Interim Order Granting Motion of Debtors for Entry of Final Orders (I) Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief [Signed: 7/1/2022] (Docket No. [64](#)).
- B. Notice of Entry of Interim Order and Final Hearing Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief [Filed: 7/5/2022] (Docket No. [81](#)).
- C. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET).**

- 12. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to



Use Cash Collateral; (III) Granting Liens and Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [Filed: 6/30/2022] (Docket No. [22](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to **July 28, 2022 at 10:00 a.m.** (Prevailing Eastern Time) for Customers Bank, Texas Capital Bank, and Flagstar Bank, FSB; to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors; and to **July 28, 2022 at 10:00 a.m.** (Prevailing Eastern Time) for Freddie Mac, and Fannie Mae).

### **Responses Received**

- A. Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#)).
- B. Flagstar Bank, FSB's Preliminary Objection to Debtors' Financing Motions and Cash Management Motion [Filed: 7/1/2022] (Docket No. [40](#)).
- C. Creditor South Street Securities LLC's Reservation of Rights to Debtors' Financing Motions and Cash Management Motion [Filed 7/25/2022] (Docket No. [195](#)).
- D. Objection of the Official Committee of Unsecured Creditors to Debtors' Motions (I) to Obtain Debtor-In-Possession "Repo" Financing, and (II) to Obtain Debtor-In-Possession "Cash Flow" Financing [Filed 7/25/2022] (Docket No. [199](#)).
- E. **Response and Reservation of Rights the Federal National Mortgage Association Related to (I) the Debtors' Cash Management Motion, (II) the Debtors' Cash Flow DIP Motion, (III) the Debtors' DIP Repo Motion, and (IV) Customers Bank's Cash Collateral Motion [Filed 7/27/2022] (Docket No. [215](#)).**
- F. **Flagstar Bank, FSB's Limited Objection and Reservation of Rights Regarding Certain Second Day Motions and Joinder to Customer Bank's 363(c)(4) Motion [Filed 7/27/2022] (Docket No. [216](#)).**
- G. **Customers Banks Reservation of Rights Regarding the Debtors (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed 7/27/2022] (Docket No. [217](#)).**
- H. **Objection of the United States of America to Debtors' Motions for DIP Financing [Filed 7/27/2022] (Docket No. [218](#)).**

### **Related Documents**



- A. Notice of Filing of Credit Agreement [Filed: 7/1/2022] (Docket No. [43](#)).
- B. Notice of Filing of Revised DIP Budget [Filed: 7/1/2022] (Docket No. [53](#)).
- C. Interim Order (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Providing Super-Priority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Scheduling a Final Hearing; (VI) Modifying the Automatic Stay; and (VII) Granting Related Relief [Signed: 7/1/2022] (Docket No. [67](#)).
- D. Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Providing Super-Priority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [Filed: 7/5/2022] (Docket No. [83](#)).
- E. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET). The Debtors intend to file a reply and a supplemental declaration in support of this motion prior to the hearing.**

- 13. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief [Filed: 6/30/2022] (Docket No. [20](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 26, 2022 at 4:00 p.m. (Prevailing Eastern Time) for Customers Bank, Texas Capital Bank, and Flagstar Bank, FSB; to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors; and to July 27, 2022 at 12:00 noon (Prevailing Eastern Time) for Freddie Mac).

**Responses Received**

- A. Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#)).
- B. Flagstar Bank, FSB's Preliminary Objection to Debtors' Financing Motions and Cash Management Motion [Filed: 7/1/2022] (Docket No. [40](#)).

- C. Creditor South Street Securities LLC's Reservation of Rights to Debtors' Financing Motions and Cash Management Motion [Filed 7/25/2022] (Docket No. [195](#)).
- D. Objection of the Official Committee of Unsecured Creditors to Debtors' Motions (I) to Obtain Debtor-In-Possession "Repo" Financing, and (II) to Obtain Debtor-In-Possession "Cash Flow" Financing [Filed 7/25/2022] (Docket No. [199](#)).
- E. **Response and Reservation of Rights the Federal National Mortgage Association Related to (I) the Debtors' Cash Management Motion, (II) the Debtors' Cash Flow DIP Motion, (III) the Debtors' DIP Repo Motion, and (IV) Customers Bank's Cash Collateral Motion [Filed 7/27/2022] (Docket No. [215](#)).**
- F. **Flagstar Bank, FSB's Limited Objection and Reservation of Rights Regarding Certain Second Day Motions and Joinder to Customer Bank's 363(c)(4) Motion [Filed 7/27/2022] (Docket No. [216](#)).**
- G. **Customers Banks Reservation of Rights Regarding the Debtors (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed 7/27/2022] (Docket No. [217](#)).**
- H. **Objection of the United States of America to Debtors' Motions for DIP Financing [Filed 7/27/2022] (Docket No. [218](#)).**

#### **Related Documents**

- A. Notice of Filing of Netting Agreement [Filed: 7/1/2022] (Docket No. [45](#)).
- B. Interim Order Pursuant to U.S.C. §§ 105, 361, 362, 363, 364, 503, 507, 546, 548, 555, 556, 559, 560 and 561 (I) Authorizing Debtors to Enter Into Repurchase Agreement Facilities and Related Documents; (II) Authorizing Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Super-Priority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (V) Granting Related Relief [Signed: 7/1/2022] (Docket No. [66](#)).
- C. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter Into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Super-Priority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (V) Granting Related Relief [Filed: 7/5/2022] (Docket No. [82](#)).
- D. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET). The Debtors intend to file a reply and a supplemental declaration in support of this motion prior to the hearing.**

14. Debtors' Motion for Entry of an Order Authorizing the Debtors to File Pricing Side Letter and Master Securities Forward Transaction Agreements Under Seal [Filed: 7/1/2022] (Docket No. [46](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 25, 2022 at 4:00 p.m. (Prevailing Eastern Time) for the Official Committee of Unsecured Creditors).

**Responses Received**

- A. Informal comments from the Office of the United States Trustee

**Related Documents**

- A. Notice of Hearing on Debtors' Motion for Entry of an Order Authorizing the Debtors to File Pricing Side Letter and Master Securities Forward Transaction Agreements Under Seal [Filed: 7/5/2022] (Docket No. [84](#)).
- B. Debtors' Witness and Exhibit List [Filed 7/26/2022] (Docket No. [203](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET).**

15. Customers Bank's Emergency Motion Seeking Interim and Final Relief Requiring Debtors to Segregate and Account for Cash Collateral in Compliance with 11 U.S.C. § 363(c)(4) [Filed 7/13/2022] (Docket No. [117](#)).

**Response Deadline:** July 21, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to July 26, 2022 at 4:00 for the Debtors, Texas Capital Bank, and Flagstar Bank, FSB)

**Responses Received**

- A. **Debtors' Statement and Reservation of Rights in Response to Customers Bank's Emergency Motion Seeking Interim and Final Relief Requiring Debtors to Segregate and Account for Cash Collateral in Compliance with 11 U.S.C. § 363(c)(4) [Filed 7/26/2022] (Docket No. [212](#)).**
- B. **Response and Reservation of Rights the Federal National Mortgage Association Related to (I) the Debtors' Cash Management Motion, (II) the Debtors' Cash Flow DIP Motion, (III) the Debtors' DIP Repo Motion, and (IV) Customers Bank's Cash Collateral Motion [Filed 7/27/2022] (Docket No. [215](#)).**

- C. **Flagstar Bank, FSB's Limited Objection and Reservation of Rights Regarding Certain Second Day Motions and Joinder to Customer Bank's 363(c)(4) Motion [Filed 7/27/2022] (Docket No. [216](#)).**

**Related Documents**

- A. Emergency Motion for Entry of an Order Shortening Notice Periods [Filed 7/13/2022] (Docket No. [118](#)).
- B. Declaration of Carol MacElree [Filed 7/13/2022] (Docket No. [119](#)).
- C. [Proposed] Order Pursuant to 11 U.S.C. § 363(c)(4) Requiring Segregation and Accounting of Cash Collateral [Filed 7/13/2022] (Docket No. [120](#)).
- D. Order Regarding Emergency Motion [Signed 7/14/2022] (Docket No. [122](#)).
- E. Order Approving Stipulation Preserving Status Quo Regarding Customers Bank Cash Collateral [Signed 7/15/2022] (Docket No. [138](#)).
- F. Notice of Hearing [Filed 7/15/2022] (Docket No. [142](#)).
- G. Order Preserving Status Quo for Fannie Mae Regarding Customers Bank Motion [Signed 7/20/2022] (Docket No. [181](#)).

**Status: This matter is adjourned to August 2, 2022 at 10:00 a.m. (ET).**

Dated: July 27, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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-and -

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*Proposed Counsel for Debtors and Debtors in Possession*