

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

In re:
FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Related Docket No. 626

AMENDED DECLARATION OF AARON SAMPLES

I, Aaron Samples, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am the Chief Executive Officer of First Guaranty Mortgage Corporation (“FGMC”) which is the sole Member of Maverick II Holdings, LLC (“Maverick”, together with FGMC, the “Debtors”). I am familiar with the Debtors’ business, financial affairs, and day-to-day operations.

2. I submit this Amended Declaration to amend paragraph 12 of the *Declaration of Aaron Samples* (the “Original Declaration”) [Docket No. 626] filed on October 28, 2022.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein. All facts set forth in the Amended Declaration are based on my personal knowledge, my discussions with other members of the Debtors’ senior management, my review of relevant documents, and/or my opinion based on my experience and knowledge of the Debtors’ operations and financial condition. In making the Amended Declaration, I have relied in part on information and materials that the Debtors’ personnel and advisors have gathered, prepared, verified, and provided to me, in each case under my ultimate supervision, at my direction, and/or for my benefit in preparing the Amended Declaration. If I were called to testify as a witness in this matter, I could and would testify competently to the facts set forth herein.

¹ 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.



4. Paragraph 12 of the Original Declaration is amended as follows: Every employee, including employees who were separated from employment on June 24, 2022, was served with notice of the October 14, 2022 bar date [Docket No. 555]. Based upon my review of the claims register kept in this case by KCC, 101 employees filed proofs of claim, and of those, only eleven (11) proofs of claim assert a WARN Act violation. One of these eleven (11) appears to be a duplicate proof of claim (See Claim No. 89). *See* Claim Nos. 85, 89, 109, 136, 212, 229, 278 (noting WARN and requesting priority claim treatment); Claim Nos. 83, 149, 157, and 221 (noting WARN and filed as general unsecured claims). The total amount for the eleven (11) asserted WARN claims is \$163,754 with two unliquidated claims. In total, the maximum priority claim portion of these claims under Bankruptcy Code § 507(a)(4), assuming they are allowable, totals \$166,650 (11 WARN claims times \$15,150 cap per claim).

Dated: October 30, 2022

/s/ Aaron Samples
Aaron Samples
Chief Executive Officer
First Guaranty Mortgage Corporation