

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

|   |   |   |
|---|---|---|
|   | ) | Chapter 11  |
| In re:                                    | ) |   |
|   | ) | Case No. 22-10584 (CTG)                               |
| FIRST GUARANTY MORTGAGE                   | ) |   |
| CORPORATION, <i>et al.</i> , <sup>1</sup> | ) | Jointly Administered                                  |
|   | ) |   |
| Debtors.                                  | ) | Related to D.I. 712                                   |
|   | ) | Objection Deadline: January 24, 2023 at 4:00 p.m.(ET) |
|   | ) | Hearing Date: January 26, 2023 at 3:00 p.m.(ET)       |
|   | ) |   |

**NOTICE OF MOTION AND HEARING**

**PLEASE TAKE NOTICE** that on December 13, 2022, Ms. Kari Crutcher (“Ms. Crutcher”), by and through her undersigned counsel, filed and served a *Motion For Limited Relief From The Permanent Injunction Of The Debtors’ Confirmed Chapter 11 Plan To Allow Her To File A Motion To Transfer Her Qui Tam Action To The District Of Delaware And To Pursue The Qui Tam Action Against The Debtor As Nominal Defendant* (D.I. 712; the “Motion”), with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion has now been scheduled for January 26, 2023, at 3:00 prevailing Eastern Time, before the Honorable Craig T. Goldblatt, 824 North Market Street 3rd Floor, Courtroom 7, Wilmington, DE 19801. Any objection or other response to the Motion must be made in writing, filed with the Clerk of the Bankruptcy Court electronically or otherwise, 824 Market Street, Wilmington, Delaware 19801,

<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.



and served so as to actually be received by the undersigned counsel for the Movant on or before **January 24, 2023, at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTION OR OTHER RESPONSE TO THE MOTION IS TIMELY FILED IN ACCORDANCE WITH THE PROCEDURES SET FORTH ABOVE, THE BANKRUPTCY COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: January 10, 2023  
Wilmington, Delaware

Respectfully submitted,

STEVENS & LEE, P.C.

/s/ Joseph H. Huston, Jr.  
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-and-

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*Counsel for Kari Crutcher*

**CERTIFICATE OF SERVICE**

Joseph H. Huston, Jr., certifies that on January 10, 2022, he caused a true and correct copy of the foregoing *Notice of Motion and Hearing* to be served on all parties in interest electronically through the Court's ECF System on all ECF participants registered in this case to receive notices. Additionally, on January 10, 2023, a true copy was served directly via electronic mail upon counsel to the Debtors, counsel to the Unsecured Creditor Committee/Liquidating Trustee and the Office of the United States Trustee.

/s/ Joseph H. Huston, Jr.

Joseph H. Huston, Jr. (No. 4035)