

**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> , ¹)		
)		(Jointly Administered)
Debtors.)		
)		

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON
SEPTEMBER 26, 2023 AT 4:00 P.M. (PREVAILING EASTERN TIME) BEFORE THE
HONORABLE CRAIG T. GOLDBLATT IN THE U.S. BANKRUPTCY COURT, 824
NORTH MARKET STREET, 6th FLOOR, COURTROOM 1,
WILMINGTON, DELAWARE 19801**

THE HEARING START TIME HAS BEEN CHANGED TO 4:00 P.M. (ET)

This hearing will be conducted in-person. All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom. Participation at the in-person court proceeding using Zoom is allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; or (iii) other extenuating circumstances as determined by Judge Goldblatt. All participants over Zoom must register in advance. Please register by September 25, 2023 at 4:00 p.m.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJIsf-Coqj4iHWA2jkdy6avpVaQK3k7XIY>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

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 location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

² This amended agenda is filed to reflect the changed start time of the hearing. Amended items appear in **bold**.



I. RESOLVED MATTERS

1. Lynley VanSingel, Melanie Meyer and Jessie Palmer’s Motion to Modify Permanent Injunction of the Debtors’ Confirmed Chapter 11 Plan to Permit Prosecution of Pending Employment Suit (Filed August 22, 2023) [Docket No. [924](#)]

Response Deadline: August 29, 2023 at 4:00 p.m. (Extended by agreement of the parties to September 17, 2023 at 4:00 p.m. as to the Debtors and Liquidating Trustee.)

Responses Received:

- A. Limited Objection of Pacific Investment Management Company LLC and PIMCO Investments LLC to the VanSingel Plaintiffs Motion to Modify Permanent Injunction (Filed August 29, 2023) [Docket No. [933](#)]

Related Documents:

- A. Certification of Counsel Submitting Revised Proposed Order (Filed September 22, 2023) [Docket No. [971](#)]

Status: A Certification of Counsel has been filed. No hearing is needed unless the Court has any questions

2. Third Omnibus Objection to Claims (Substantive) (Filed August 25, 2023) [Docket No. [929](#)]

Response Deadline: September 19, 2023 at 4:00 p.m.

Responses Received:

- A. Ohio Department of Taxation’s Response in Opposition to Liquidation Trustee’s Third Omnibus Objection to Claims (Filed September 5, 2023) [Docket No. [946](#)]
- B. Response by the Tennessee Department of Revenue to the Third Omnibus Objection to Claims (Substantive) (Filed September 15, 2023) [Docket No. [964](#)]

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with the Third Omnibus Objection to Misclassified Claims (Substantive) (Filed September 12, 2023) [Docket No. [962](#)]
- B. Withdrawal of Ohio Department of Taxation’s Response in Opposition to Liquidation Trustee’s Third Omnibus Objection to Claims (Filed September 19, 2023) [Docket No. [965](#)]

Status: The Liquidating Trustee anticipates filing a revised form of order under Certification of Counsel prior to the hearing. To the extent not resolved, any open claim objection will be continued to a date to be determined.

II. CONTESTED MATTERS

3. Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 15, 2023) [Docket No. [834](#)]

Response Deadline: June 22, 2023 at 4:00 p.m. (extended for various parties)

Supplemental Deadline: July 25, 2023 at 4:00 p.m. (Extended to July 26, 2023 at 4:00 p.m. for BSI Financial Services and Federal National Mortgage Association.)

Responses Received:

- A. Objection of the Federal National Mortgage Association to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 22, 2023) [Docket No. [840](#)]
- B. Servis One, Inc. d/b/a BSI Financial Services's Objection to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 26, 2023) [Docket No. [846](#)]
- C. Objection of Federal Home Loan Mortgage Corporation to the Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 27, 2023) [Docket No. [850](#)]
- D. Limited Objection of Lynley Vansingel, Melanie Meyer, and Jessie Palmer to Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 25, 2023) [Docket No. [887](#)]
- E. Supplemental Objection of Federal National Mortgage Association to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 27, 2023) [Docket No. [888](#)]
- F. Servis One, Inc. d/b/a BSI Financial Services's Supplemental Objection to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 27, 2023) [Docket No. [890](#)]

Related Documents:

- A. Liquidating Trustee's Amended Witness and Exhibit List for Hearing on June 29, 2023 at 2:30 P.M. (ET) (Filed June 29, 2023) [Docket No. [858](#)]
- B. Re-Notice of Hearing on Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 11, 2023) [Docket No. [877](#)]
- C. Re-Notice of Hearing on Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 27, 2023) [Docket No. [889](#)]

Replies Filed:

- A. Omnibus Reply in Support of Motion for Order Authorizing the Destruction of Certain Records in Accordance with the Confirmed Liquidating Plan and Liquidating Trust Agreement and Pursuant to Bankruptcy Code Sections 105 and 363 (Filed July 5, 2023) [Docket No. [857-2](#)]
 - a. Order Granting Motion For Leave to File a Late Reply in Support of Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 28, 2023) [Docket No. [870](#)]

Status: The Liquidating Trustee continues to work with the parties in an attempt to reach a resolution of this matter. At present, this matter is going forward. The Liquidating Trustee will rely on the witness and exhibit list previously filed in connection with this matter.

Dated: September 26, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcaloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street, #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for Debtors and Liquidating Trustee