

RECEIVED
R.I. DEPT. OF STATE
BUS SVCS DIV

125485

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

_____)
In re: _____) Chapter 11
_____)
FIRST GUARANTY MORTGAGE _____) Case No. 22-10584 (CTG)
CORPORATION, *et al.*,¹ _____)
_____) (Jointly Administered)
_____) Debtors. _____)
_____) Docket Ref. Nos. 406, 499

NOTICE OF SUCCESSFUL BIDDER AND CANCELLATION OF AUCTION

PLEASE TAKE NOTICE that on September 7, 2022, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) a motion [Docket No. 406] (the “Motion”)² seeking entry of an order (the “Bidding Procedures Order”), approving Bidding Procedures, scheduling an auction of the Assets (the “Auction”), and granting other related relief.

PLEASE TAKE FURTHER NOTICE that on September 29, 2022, the Court entered the Bidding Procedures Order [Docket No. 499]. In accordance with the Bid Procedures Order, the Debtors scheduled an Auction for October 25, 2022, at 10:00 a.m. (prevailing Eastern Time). At the Bid Deadline, the Debtors received only one Qualified Bid for their Assets.

PLEASE TAKE FURTHER NOTICE that the Debtors have declared LVS II SPE XXXIV LLC and/or its designee, including an affiliate formed for purposes of taking title to the Assets, the Successful Bidder for certain of the Debtors’ Assets (the “Purchased Assets”) identified in **Exhibit A** attached hereto.

PLEASE TAKE FURTHER NOTICE that, in accordance with the terms of the Bidding Procedures Order, the Debtors have canceled the Auction.

PLEASE TAKE FURTHER NOTICE that the Debtors will seek approval of the Sale of the Purchased Assets at a hearing (the “Sale Hearing”) scheduled to commence on **October 31, 2022, at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, Wilmington, Delaware 19801. The Sale Hearing may be adjourned or rescheduled by the Debtors, in consultation with the Committee and the

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.

² Capitalized terms used but not defined herein shall have the respective meanings ascribed to such terms in the Motion or the Bidding Procedures, as applicable.

Successful Bidder, to a time and date consistent with the Court's calendar, as set forth in notice on the docket of these Chapter 11 Cases, a notice of agenda, or stated orally at the Sale Hearing.

Dated: October 24, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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
mcalloway@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 Debtors in Possession

If you have any questions related to this notice, please call (888) 647-1742 (U.S./Canada) or (310) 751-2626 (International) for international callers. You may access documents and case information at <http://www.kcellc.net/FGMC>.