IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Chapter 11

GWG HOLDINGS, INC., et al., 1

Case No. 22-90032 (MI)

Debtors.

Jointly Administered

NOTICE OF ELECTRONIC FIRST DAY HEARING

PLEASE TAKE NOTICE that on April 20, 2022 (the "<u>Petition Date</u>"), the above-captioned debtors and debtors-in-possession filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas.

PLEASE TAKE FURTHER NOTICE that a hearing will be held on April 21, 2022, at 3:30 p.m. (prevailing Central Time), before the Honorable Marvin Isgur, United States Bankruptcy Judge for the Southern District of Texas, in Courtroom 404, 515 Rusk Street, Houston, Texas, 77002, to consider the relief requested in the following (the "First Day Pleadings"):

- 1. *DIP Financing Motion*. Debtors' Emergency Motion For Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Modifying the Automatic Stay, (V) Authorizing the DLP VI Option Upon Entry of the Final Order, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief. [Dkt. No. 13, filed April 20, 2022].
- **2.** Cash Management Motion. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System and Maintain Existing Bank Accounts, (B) Maintain Existing

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' proposed claims and noticing agent: https://donlinrecano.com/gwg.

- Business Forms and Books and Records, and (C) Continue to Perform Intercompany Transactions and (II) Granting Related Relief [Dkt. No. 8, filed April 20, 2022].
- **Wages Motion.** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief. [Dkt. No. 4, filed April 20, 2022].
- **4.** *Critical Vendor Motion.* Debtors' <u>Emergency</u> Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Critical Vendors, and (II) Granting Related Relief. [Dkt. No. 5, filed April 20, 2022].
- 5. Insurance Motion. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related thereto, and (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies and (II) Granting Related Relief [Dkt. No. 6, filed April 20, 2022].
- 6. *NOL Motion.* Debtors' <u>Emergency</u> Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of Common Stock and (II) Granting Related Relief. [Dkt. No. 7, filed April 20, 2022].
- 7. Taxes Motion. Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief. [Dkt. No. 11, filed April 20, 2022].
- **8.** Application to Appoint Claims Agent. Debtors' Amended Emergency Ex Parte Application For an Entry of an Order Appointing Donlin, Recano & Company, Inc. as Claims, Noticing, Solicitation, and Administrative Agent.. [Dkt. No. 46, filed April 20, 2022].
- 9. Notice Procedures Motion. Debtors' Emergency Motion for Order Pursuant to Bankruptcy Code Section 105, Bankruptcy Rules 1015, 2002, 9007, and 9036, Local Bankruptcy Rule 2002-1, and the Complex Case Procedures Authorizing the Modification and Establishment of Certain Notice Procedures [Dkt. No. 9, filed April 20, 2022].
- 10. Consolidated Creditor Matrix Motion. Debtors' Emergency Motion for Entry of an Order (I) Waiving the Requirement to File a List of Equity Security Holders, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, and (III) Granting Related Relief [Dkt. No. 16, filed April 20, 2022].
- 11. SOFA/ Schedule Extension Motion. Debtors' Emergency Motion For Entry of an Order Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, (D) Statements of Financial Affairs, and (II) Granting Related Relief. [Dkt. No. 10, filed April 20, 2022].

PLEASE TAKE FURTHER NOTICE that audio communication will be by use of the Court's dial-in facility. You may access the facility at 832-917-1510. You will be responsible for your own long-distance charges. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 954554. You may view video via GoToMeeting. To use GoToMeeting, the Court recommends that you download the free GoToMeeting application. To connect, you should enter the meeting code "JudgeIsgur" in the GoToMeeting app or click the link on Judge Isgur's home page on the Southern District of Texas website. Once connected, click the settings icon in the upper right corner and enter your name under the personal information setting.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings can be obtained through the Bankruptcy Court's electronic case filing system at https://ecf.txsb.uscourts.gov or can be obtained free of charge on the website maintained by the Debtors' proposed claims and noticing agent at https://donlinrecano.com/gwg.

PLEASE TAKE FURTHER NOTICE that hearing appearances must be made electronically in advance of the hearing. To make your electronic appearance, go to the Southern District of Texas website and select "Bankruptcy Court" from the top menu. Select "Judges' Procedures," then "View Home Page" for Judge Isgur. Under "Electronic Appearance" select "Click here to submit Electronic Appearance." Select the case name, complete the required fields and click "Submit" to complete your appearance.

PLEASE TAKE FURTHER NOTICE that if you object to the relief requested or you believe that emergency consideration is not warranted, you must either appear at the hearing or file a written response prior to the hearing. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

If you have any questions related to this notice, please call 1 (888) 508-2507 or submit an inquiry via e-mail to gwginfo@donlinrecano.com.

You may access documents and case information at https://donlinrecano.com/gwg.

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Dated: April 20, 2022 Houston, Texas

Respectfully Submitted,

/s/ Charles S. Kelley

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Proposed Counsel for the Debtors and Debtors in Possession

Certificate of Service

I certify that on April 20, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles S. Kelley

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