

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

In re:

TRIAD GUARANTY INC.<sup>1</sup>

Debtor.

Chapter 11

Case No. 13-11452 (MFW)

**DECLARATION OF MIKE ANDERSON IN SUPPORT OF DEBTOR'S FIRST OMNIBUS  
OBJECTION (SUBSTANTIVE) TO CLAIMS PURSUANT TO 11 U.S.C. § 502,  
FED. R. BANKR. P. 3007 AND DEL. BANKR. L.R. 3007-1**

I, Mike Anderson, being duly sworn, depose and say:

1. I am the Chief Financial Officer of Triad Guaranty Inc., the debtor (the "Debtor") in the above-captioned case, and in such capacity, I am authorized to submit this declaration on behalf of the Debtor in support of the Debtor's first omnibus objection (substantive) to claims pursuant to 11 U.S.C. § 501, 502, and 503, Fed. R. Bankr. P. 3007, and Del. Bankr. L.R. 3007-1.

2. As Chief Financial Officer, I am familiar with the Debtor's books and records and bankruptcy proceedings. Except as otherwise noted, I have personal knowledge of the matters set forth herein or have gained knowledge of such matters from the Debtor's retained advisors that report to me in the ordinary course of my responsibilities. If called upon to testify I would testify competently to the facts set forth herein.

3. On June 3, 2013 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code.

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<sup>1</sup> The last four digits of the Debtor's federal taxpayer identification number are 8519. The location of the Debtor's headquarters and the Debtor's service address is 1900 Crestwood Blvd., Birmingham, AL 35210.

4. On January 9, 2018, the Court entered an order confirming the Amended Joint Plan of Reorganization of the Debtor and Wolfgang Holdings, LLC. The Plan became effective on April 27, 2018.

5. The deadline for non-governmental units to file proofs of claim was October 31, 2013, while the deadline for governmental units to file proofs of claim was December 2, 2013.

6. With the assistance of the Debtor's attorneys at Fox Rothschild LLP, I have reviewed proofs of claims filed in the Debtor's bankruptcy case. The claimants listed on Exhibit A the Claims Objection filed claims as unliquidated claims and indicated that no claim amount had been determined. I have further reviewed the materials annexed to these claims and no claim amounts can be determined from said materials. Additionally, I am unaware of the fixing of any liquidated amounts for these claims as of the Petition Date or since.

7. The claim listed on Exhibit B asserts a claim for which the Debtor is not liable.

8. Based on the foregoing, it is respectfully requested that the claims listed on Exhibits A and B to the Claims Objections be disallowed in full and expunged.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: July 27, 2018

/s/ Mike Anderson