

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

In re:

GWG HOLDINGS, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 22-90032 (MI) (Jointly
Administered)

GWG WIND DOWN TRUST BUDGET

On March 13, 2025, the Court entered a Case Management Order [Dkt. No 2546] requesting that the GWG Litigation Trustee prepare a further supplement providing:

- 1) reasonable estimated expenses of the Wind Down Trust;
- 2) the amount that is estimated to be distributable to trust beneficiaries, and
- 3) the distributions that are estimated for a typical bondholder.

The Litigation Trustee filed a Supplemental Exhibit at ECF Docket No. 2544 reflecting the reasonable estimated expenses of the Wind Down Trust related to the proposed settlements and the amount to be distributed to the Trust beneficiaries. The Litigation Trustee filed a Supplemental Exhibit at ECF Docket No. 2566 reflecting the estimated distributions for the typical bondholder.

Elizabeth Freeman, the Trustee of the GWG Wind Down Trust (the “Wind Down Trust”), submits the attached budget from April 30, 2025 through the end of the term of the Wind Down Trust (if not extended). The budget is being filed to provide further transparency regarding the operations of the Wind Down Trust. The budget does not include any Litigation Trust Proceeds or

¹ 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); GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). Information regarding these chapter 11 cases is available at www.gwgholdingstrust.com.

distributions of those proceeds. The Trustee does not anticipate that any Litigation Trust proceeds will be required **at any time** to fund the operations of the Wind Down Trust.

CERTIFICATE OF SERVICE

On April 9, 2025, I caused this budget to be served by the Court's CM/ECF system on all parties entitled to notice. Further, the budget will be posted on the Wind Down Trust Website at www.gwgholdingstrust.com.

/s/ Elizabeth Freeman
Elizabeth Freeman

GWG WIND DOWN TRUST CASH FORECAST - APRIL 30, 2025 - JULY 31, 2026

(\$ in Thousands)		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	CUMULATIVE FORECAST	
		FORECAST Month Ending 4/30/2025	FORECAST Month Ending 5/31/2025	FORECAST Month Ending 6/30/2025	FORECAST Month Ending 7/31/2025	FORECAST Month Ending 8/31/2025	FORECAST Month Ending 9/30/2025	FORECAST Month Ending 10/31/2025	FORECAST Month Ending 11/30/2025	FORECAST Month Ending 12/31/2025	FORECAST Month Ending 1/31/2026	FORECAST Month Ending 2/28/2026	FORECAST Month Ending 3/31/2026	FORECAST Month Ending 4/30/2026	FORECAST Month Ending 5/31/2026	FORECAST Month Ending 6/30/2026	FORECAST Month Ending 7/31/2026		
OPERATING CASH - Beg Book Balance		FN1	8,799	8,404	8,032	8,026	7,804	7,647	7,459	7,292	7,140	6,988	6,796	6,475	6,298	6,131	5,979	5,827	8,799
Inflows:																			
	Beneficient Stock - Sale		-	75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	75
	Return of Escrow	FN2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,330	3,330
	Professional Fees Reimbursements, etc.	FN3 FN4	-	-	325	-	-	-	-	-	-	-	-	-	-	-	-	655	980
	Total Inflows		-	75	325	-	-	-	-	-	-	-	-	-	-	-	-	3,985	4,385
Outflows <i>General Expenses</i>																			
	Payroll and Benefits		6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
	Insurance		-	-	-	-	-	-	-	-	-	79	-	-	-	-	-	-	79
	Taxes (Tax Prep & Grantor Letters)		30	-	-	-	-	-	-	-	-	50	-	-	-	-	-	40	120
	Professional Fees (Stretto, Aaron Campbell, etc.)		30	30	104	30	30	30	25	25	25	25	25	25	25	25	25	25	504
	System/IT – General (Atomic)		20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	320
	Investor Administrative Support (Computershare)		20	5	5	5	5	5	5	5	5	20	5	5	5	5	5	5	110
	G&A/Facilities (Storage Facility Charges)		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	9
	Miscellaneous	FN5	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	40
	Estimated Cost of Distribution		-	-	-	-	30	-	-	-	-	-	-	-	-	-	-	30	60
	Total General		109	58	132	58	58	88	53	53	53	53	197	53	53	53	53	123	1,249
	Total Outflows		109	58	132	58	58	88	53	53	53	53	197	53	53	53	53	123	1,249
Net Cash Flow from Operations			(109)	17	193	(58)	(58)	(88)	(53)	(53)	(53)	(53)	(197)	(53)	(53)	(53)	(53)	3,862	3,136
NON-OPERATING EXPENSES																			
	<i>Wind Down Trust advisors' professional fees</i>																		
	Liz Freeman Law (Wind Down Trustee)		100	75	35	35	35	35	35	35	35	35	35	35	35	35	35	35	665
	MACCO (WDT - Financial Advisor)		160	150	150	100	50	50	50	50	75	75	75	50	50	50	50	50	1,235
	Donlin Recano (WDT - Noticing Agent)		4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	64
	Katten Muchin (Legal Counsel)		10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	160
	Total Wind Down Trust advisors' professional fees		274	239	199	149	99	99	99	99	124	124	124	99	99	99	99	99	2,124
	<i>Bankruptcy advisors' professional fees</i>																		
	Porter Hedges - Claims Analysis & Case Closing		-	150	-	-	-	-	-	-	-	-	-	-	-	-	-	-	150
	US Trustee Fees		11	-	-	15	-	-	15	-	15	-	-	15	-	-	-	15	86
	Total Bankruptcy advisors' professional fees		11	150	-	15	-	-	15	-	15	-	-	15	-	-	-	15	236
	Total Non-Operating Expenses		285	389	199	164	99	99	114	99	99	139	124	124	114	99	99	114	2,360
OPERATING CASH - Ending Balance			8,404	8,032	8,026	7,804	7,647	7,459	7,292	7,140	6,988	6,796	6,475	6,298	6,131	5,979	5,827	9,575	9,575

The Cash Forecast herein, presents estimated inflows (sources) and outflows (uses) of cash through July 31, 2026. This forecast does not include any Litigation Trust proceeds received or distributed to Interest Holders. This forecast contemplates the termination of the Trust on August 1, 2026, unless extended. Certain estimates have been made based on information available as of April 1, 2025. Actual results may vary.

Footnotes:

FN1 Opening balance as of 4/30/2025

FN2 Estimated date of return of escrowed cash pursuant to Indemnification Agreement (\$3,000,000 plus accrued interest)

FN3 Receivable for service invoices paid on behalf of GWG Litigation Trust (\$325k)

FN4 Estimated return of professional fee retainage of approximately (\$655k), actual returns may vary.

FN5 Includes additional expenses such as Storage Facility, Bank Fees, etc.