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October 4, 2019

VIA HAND DELIVERY AND FILE & SERVEXPRESS

The Honorable Morgan T. Zurn
Court of Chancery
Leonard L. Williams Justice Center
500 North King Street, Suite 11400
Wilmington, Delaware 19801

Re: *IMO: Schuff Int'l Inc. S'holders Litig.*
C.A. No. 10323-VCZ

Dear Vice Chancellor Zurn:

I write on behalf of, and with the approval of, all parties in the above-referenced matter (the "Parties") to provide an update to the Court.

Since my August 13, 2019 status report to the Court (Dkt. 96), the Parties have nearly completed the documents required to file a settlement agreement with the Court. The Parties expect to present a proposed settlement agreement to the Court by November 8, 2019. If for any reason the Parties have not finalized the settlement documents by that date, the Parties will provide the Court with another update at that time.

As always, counsel are available at the Court's convenience if Your Honor has any questions.

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Respectfully,

/s/ J. Peter Shindel, Jr.

J. Peter Shindel, Jr. (#5825)

Words: 111

JPS/

cc: Register in Chancery (via File & Serve*Xpress*)
All Counsel of Record (via File & Serve*Xpress*)