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ABRAMS & BAYLISS LLCase No. 10323-VCZ

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November 8, 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

MATTHEW L. MILLER

Re: IMO: Schuff Int'l Inc. S'holders Litig.

C.A. No. 10323-VCZ

Dear Vice Chancellor Zurn:

I write in follow-up to Mr. Shindel's October 4, 2019 letter to provide an update to the Court. *See* Dkt. 97.

During the past month, the parties have continued to make progress in finalizing a proposed settlement for the Court's approval. This progress includes the exchange of additional drafts of the settlement papers and preliminary board meetings at the relevant corporations to evaluate the proposed settlement. We respectfully request until Friday, November 15, 2019, to present a proposed settlement agreement to the Court or provide a further status update.

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

The Honorable Morgan T. Zurn November 8, 2019 Page 2

Respectfully,

/s/ Matthew L. Miller

Matthew L. Miller (#5837)

Words: 104

MLM/

cc: Register in Chancery (via File & Serve*Xpress*)

All Counsel of Record (via File & Serve*Xpress*)