

**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

**SCHUFF INTERNATIONAL, INC.)      CONSOLIDATED  
STOCKHOLDERS LITIGATION )      C.A. NO. 10323-VCZ**

**FAIR VALUE INVESTMENTS INCORPORATED'S NOTICE OF  
INTENTION TO APPEAR AND OBJECTION TO SETTLEMENT**

In accordance with the Stipulation and Agreement of Compromise, Settlement, and Release, dated November 15, 2019 (the "Settlement Agreement"); the Scheduling Stipulation, dated December 5, 2019; and the Notice of Pendency of Class Action, Proposed Settlement of Class Action, and Settlement Hearing, dated December 9, 2019, Objector Fair Value Investments Incorporated ("FVI"), by and through its undersigned counsel, hereby submits its written notice of intention to appear to object to the proposed settlement embodied in the Settlement Agreement (the "Settlement"), as follows (the "Objection"):

1. By and through its undersigned counsel, FVI intends to appear at the February 13, 2020 settlement hearing (the "Settlement Hearing") in the above-captioned action for the purpose of objecting to the Settlement.

2. FVI is also serving and filing contemporaneously herewith its written and signed Notice of Intention to Appear, to which proof its ownership of DBM Global Inc. (formerly known as Schuff International, Inc.) shares is attached, and which is incorporated by reference herein. Included as Exhibits A through G to the Objection, and incorporated by reference herein, are Affidavits executed by seven

other Non-Tendered Stockholders, representing more than 130,000 shares of DBM Global Inc. (formerly known as Schuff International, Inc.) and making up more than 45% of the Non-Tendered Stockholder shares, providing their express support for FVI's Objection to the proposed Settlement.

3. FVI objects to the Court's approval of the Settlement and entry of the [Proposed] Final Order and Judgment submitted therewith. The grounds for FVI's objections and the reasons that it desires to appear and be heard through its Counsel at the February 13, 2020 hearing include the following:

- a. The proposed Settlement is not fair to the Non-Tendered Stockholders<sup>1</sup> who do not wish to tender their shares into the Settlement Tender Offer.
- b. The proposed Settlement unfairly holds the non-party Company economically responsible for Defendants alleged malfeasance.
- c. The proposed Settlement seeks approval of an intergalactic release.
- d. The proposed Settlement impermissibly releases derivative claims belonging to the non-party Company.
- e. The proposed Settlement impermissibly releases all claims stemming from the Settlement itself.

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<sup>1</sup> Capitalized terms not otherwise defined herein have the same meanings as in the Settlement Agreement.

- f. The proposed Settlement constitutes unfair self-dealing by the Company's controller and Board at the expense of the Company and the Class.
- g. The proposed Settlement is unfairly coercive.
- h. Non-Tendered Stockholders should be carved out or allowed to opt out of the proposed Settlement.
- i. Such other defects that FVI may discover between now and the time of the February 13, 2020 hearing.

4. A more detailed statement of FVI's objections and its grounds for objections and reasons for a desire to appear and be heard are contained in its Brief in Support of Objection to Proposed Settlement ("Brief") being served and filed with this Objection and the other papers served and filed in support of the Objection, and which is incorporated by reference herein.

5. Other documents or writings that FVI desires the Court to consider are attached as Exhibits and/or incorporated by reference herein and/or in the Brief or transmittal affidavit in support of the Brief that are being filed contemporaneously with this Notice.

Dated: January 24, 2020

CHIMICLES SCHWARTZ KRINER &  
DONALDSON-SMITH LLP

By: /s/ Robert J. Kriner, Jr.  
Robert J. Kriner, Jr. (#2546)

OF COUNSEL:

WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP

Daniel W. Krasner  
270 Madison Avenue  
New York, New York 10016  
(212) 545-4600

Tiffany J. Cramer (#4998)  
2711 Centerville Road, Suite 201  
Wilmington, DE 19808  
(302) 656-2500

*Attorneys for Objector, Fair Value  
Investments Incorporated*

**CERTIFICATE OF SERVICE**

I, Tiffany J. Cramer, hereby certify that on January 24, 2020, I caused a copy of the foregoing to be filed and served upon the following counsel of record via File & ServeXpress:

Seth D. Rigrotsky  
Brian D. Long  
Gina M. Serra  
RIGRODSKY & LONG, P.A.  
300 Delaware Avenue, Suite 1220  
Wilmington, DE 19801

Kevin G. Abrams  
J. Peter Shindel, Jr.  
Mathhew L. Miller  
ABRAMS & BAYLISS LLP  
20 Montchanin Road, Suite 200  
Wilmington, DE 19807

Kelly A. Terribile  
Steven T. Margolin  
GREENBERG TRAUERIG, LLP  
1007 North Orange Street, Suite 1200  
Wilmington, DE 19801

Peter B. Ladig  
Elizabeth A. Powers  
BAYARD, P.A.  
600 North King Street, Suite 400  
Wilmington, DE 19801

Kurt M. Heyman  
Aaron M. Nelson  
HEYMAN ENERIO GATTUSO & HIRZEL  
LLP  
300 Delaware Avenue, Suite 200  
Wilmington, DE 19801

/s/ Tiffany J. Cramer  
Tiffany J. Cramer (#4998)

# EXHIBIT A

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

**AFFIDAVIT OF Douglas Schoenberg**  
**IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED**

State of PA )  
 ) ss.:  
County of Montgomery )

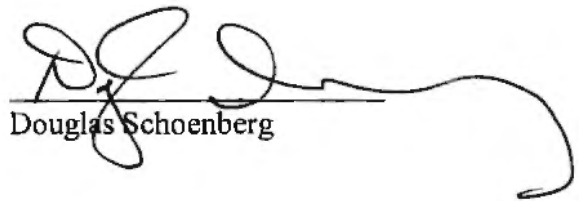
Douglas Schoenberg, being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 55,733 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

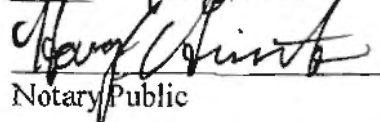
<u>Shares</u>	<u>Broker/Custodian/Other Records</u>
43,934	TD Ameritrade – Douglas Schoenberg
3,700	TD Ameritrade – Adam Schoenberg
5,699	TD Ameritrade – SofterWare Inc. (Douglas Schoenberg, CEO)
2,400	TD Ameritrade – Allison Rose Schoenberg

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

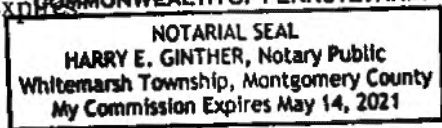
Dated: January 18th, 2020

  
Douglas Schoenberg

Sworn to before me this 18th of January, 2020

  
Notary Public

My Commission Expires 2021 COMMONWEALTH OF PENNSYLVANIA











Statement for Account # [REDACTED]  
 12/01/19 - 12/31/19

Income Summary Detail\*

Current

Description

Ordinary Dividends  
 Interest Income Credit Balance  
 Foreign Dividend Tax Withheld  
 Qualified Dividends  
 IDA Interest

\*This section displays current and year to date taxation values for this account. The current totals may not equate to the total payments listed on this statement as corrections to tax reporting may also be included. These corrections can include changes made to previous payments and removal of payments reportable in a previous tax year (spillover dividends). The year to date totals will accurately reflect your cumulative amount for the year.

Account Positions

Investment Description	Symbol/ CUSIP	Quantity	Current Price	Market Value	Purchase Date	Cost Basis	Average Cost	Unrealized Gain(Loss)	Estimated Income	Yield
Stocks - Margin										
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
DBM GLOBAL INC COM	DBMG	2,400	58.00	139,200.00	01/26/01	7,210.00	3.00	131,990.00	-	-
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

# **EXHIBIT B**

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. )  
STOCKHOLDERS LITIGATION ) CONSOLIDATED  
C.A. NO. 10323-VCZ

AFFIDAVIT OF JAMES RIVEST  
IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED

State of FLORIDA )  
 ) ss.:  
County of SARASOTA )

JAMES RIVEST, being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 24,448 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

<u>Shares</u>	<u>Broker/Custodian/Other Records</u>
<u>13,500</u>	<u>ETRADE</u>
<u>5,000</u>	<u>FIDELITY</u>
<u>1,895</u>	<u>VANGUARD</u>
<u>4,053</u>	<u>CALDWELL</u>

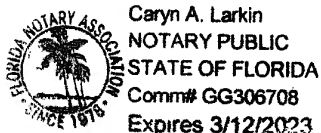
2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

Dated: January 21, 2020

Sworn to before me this  
21 of January, 2020

  
Notary Public

My Commission Expires:



**E\*TRADE Platinum**  
Investment Account

**E TRADE**

Account Number: [REDACTED] Account Type: ROTH IRA

Statement Period: December 1, 2019 - December 31, 2019

**ACCOUNT HOLDINGS**  
**CASH & CASH EQUIVALENTS (4.70% of Holdings)**

DESCRIPTION	PORTFOLIO %	AMOUNT
Retirement Sweep Deposit Account Program		
Opening Balance		
Average Balance	4.70	
Closing Balance		
Retirement Sweep Deposit Account Program Balance by Bank as of December 31, 2019		
E*TRADE BANK		

The E\*TRADE Financial Retirement Sweep Deposit Account Program (RSDA Program) is a bank sweep program associated with eligible E\*TRADE Securities, LLC retirement accounts. Cash balances held in retirement accounts are swept to bank deposit accounts at E\*TRADE Bank and E\*TRADE Securities, LLC. The RSDA Program is subject to the RSDA Program Agreement, which is available on the E\*TRADE website. For more information regarding the RSDA Program, please review your RSDA Program Customer Agreement, visit [www.etrade.com](http://www.etrade.com), or call us at 1-800-387-2381.

**TOTAL CASH & CASH EQUIVALENTS** 4.70%

**TOTAL CASH & CASH EQUIVALENTS YTD INTEREST (CREDIT INTEREST ONLY)**

**STOCKS, OPTIONS & EXCHANGE-TRADED FUNDS (94.09% of Holdings)**

DESCRIPTION	SYMBOL / CUSIP	ASST TYPE	QUANTITY	PRICE	TOTAL MKT VALUE	PORTFOLIO (%)	EST. ANNUAL INCOME	EST. ANNUAL YIELD (%)
DBM GLOBAL INC COM		Cash	134	56.0000	7,772.00	0.24		
DBM GLOBAL INC COM		Cash						

DBMG - 134 SHARES

**E TRADE**  
Investment Account

Account Number: 3849-2317

Statement Period: December 1, 2019 - December 31, 2019

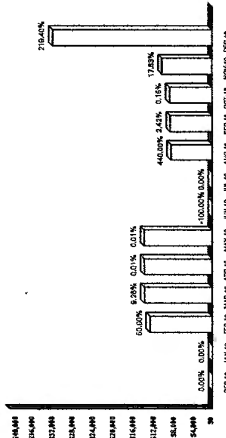
Account Type: ROTH IRA

**ACCOUNT TRANSACTION SUMMARY**

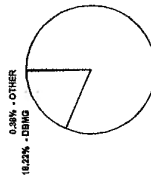
DESCRIPTION	THIS PERIOD	YEAR TO DATE
Securities Purchased	\$	\$
Securities Sold	\$	\$
Interest Received	\$	\$
Tax Exempt	\$	\$

Refer to the Retirement Activity Summary section on page 3 for a summary of your retirement account transactions.

**NET ACCOUNT VALUE BY MONTH END**



**TOP 10 ACCOUNT HOLDINGS (AS OF 12/31/19)**



**E TRADE**  
Investment Account

Account Number: 3849-2317

Statement Period: December 1, 2019 - December 31, 2019

Account Type: ROTH IRA

**ACCOUNT HOLDINGS**

CASH & CASH EQUIVALENTS (81.40% of Holdings)

Retirement Sweep Deposit Account Program

Average Balance

Ending Balance

ETRADE BANK: Depositor Account Program Balance by Bank as of December 31, 2019

The ETRADE Financial Retirement Sweep Deposit Account Program (RSDA Program) is a bank sweep program associated with eligible ETRADE Securities LLC retirement accounts. Cash

balances held in retirement accounts are swept to bank deposit accounts at ETRADE Bank and ETRADE Bank and ETRADE Bank, which are affiliates of ETRADE Securities LLC. The RSDA Program is

designed to offer up to \$500,000 in FDIC deposit insurance coverage to eligible retirement accounts. RSDA Program coverage is held in the affiliate banks as not covered by SIPC protection. Your

coverage is provided by the FDIC. For more information about the RSDA Program, please contact your RSDA Program

Customer Agreement, visit www.etrade.com, or call us at 1-800-397-2321.

TOTAL CASH & CASH EQUIVALENTS

\$25,549.00

81.40%

ETRADE BANK

ETRADE BANK

ETRADE BANK

ETRADE BANK

ETRADE BANK

ETRADE BANK

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DBMG - 99 SHARES















**Caldwell Iviter Capital, Inc.**

JAMES JUDE RUEST  
 WINDMILL SECURITIES INC CTDN  
 IRA ROTH

**ACCOUNT SUMMARY**  
 (Unquoted Securities Excluded)  
 CASH & CASH EQUIVALENTS (in US \$)  
 EQUITIES  
 ACCOUNT NET MONTH

12-31-19  
 INCOME/PRINCIPAL SUMMARY  
 CASH DIVIDEND  
 CREDIT INTEREST  
 TOTAL INCOME/PRINCIPAL

12-31-19  
 PROJECT INVESTMENT

12-31-19  
 YEAR TO DATE

**ACCOUNT PORTFOLIO**  
 MONEY BALANCE (in US \$): NET CREDIT

0.00 DBM GLOBAL INC  
 (NON-PUBLIC SECURITY) (A NON PUBLIC SECURITY)  
 PRICED LAST KNOWN TRANS

SYMBOL	CURRENT PRICE	CURRENT VALUE	COST BASIS	UNREALIZED GAIN/LOSS	ESTIMATED ANNUAL CURRENT INCOME - YIELD %
DBMG	58.00	235,074	189,085	41,419	5.6
	20.00	304,020	241,404	82,536	5.6
<b>GRAND TOTAL</b>					

DBMG - 4,053 SHARES

The cost basis shown on this statement is for informational purposes only. Please refer to actual purchase documentation to confirm its accuracy. You are urged to consult with your own tax advisor regarding the taxable status of any realized gain or loss.

**ACCOUNT ACTIVITY**

DATE	ACTIVITY	QUANTITY	DESCRIPTION	PRICE	AMOUNT CHARGED	AMOUNT CREDITED
12-03-19	SOLD					
12-03-19	SOLD					
12-03-19	EXCHANGE					
12-03-19	EXCHANGE					
12-18-19	TENDER					
12-18-19	CHARGE					
12-18-19	TENDER					
12-18-19	CHARGE					
12-30-19	CREDIT INT					

FOR 31 DAYS FROM 11/27/19 THRU 1/25/19

# **EXHIBIT C**

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

AFFIDAVIT OF ANDREW KATZMAN  
IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED

State of New York )  
County of New York ) ss.:

ANDREW KATZMAN, being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 14,986 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

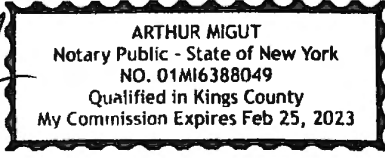
<u>Shares</u>	<u>Broker/Custodian/Other Records</u>
<u>SEE ATTACHED</u>	

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

Dated: January 19<sup>th</sup>, 2020

Sworn to before me this 19 of January, 2020

Arthur Migut  
Notary Public



My Commission Expires: Feb 25, 2023



**DBMG Shares**

Fidelity Y03	2,245
TD Ameritrade 5961	839
Schwab 8386	250
Schwab 6342	300
Schwab 9781	3,350
TD Ameritrade 8900	300
TD Ameritrade 7224	4,602
TD Ameritrade 0183	2,800
Vanguard 9990	300
<b>TOTAL</b>	<b>14,986</b>





Statement Reporting Period:  
12/01/19 - 12/31/19

Statement for Account # [REDACTED]  
ANDREW KAUFMAN  
TOD  
255 W 94TH ST APT 17E  
NEW YORK, NY 10025-9651

800-669-3900  
TD AMERITRADE  
DIVISION OF TD AMERITRADE INC  
PO BOX 2209  
OMAHA, NE 68103-2209  
TD Ameritrade Clearing, Inc., Member SIPC

Investment	Current Value	Prior Value	Period Change	% Change	Estimated Income	Estimated Yield	Portfolio Allocation
Cash	\$ -	\$ -	\$ -	-	\$ -	-	
Instrd Dep Acct (IDA)	-	-	-	-	-	-	
Money Market	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Money Market
Short Balance	-	-	-	-	-	-	
Stocks	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Stocks
Short Stocks	-	-	-	-	-	-	
Fixed Income	-	-	-	-	-	-	
Options	-	-	-	-	-	-	
Short Options	-	-	-	-	-	-	
Mutual Funds	-	-	-	-	-	-	
Other	-	-	-	-	-	-	
<b>Total</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
<b>Margin Equity</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	

	Current	YTD	Reportable	Non Reportable	YTD
<b>Opening Balance</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Securities Purchased	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Securities Sold	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Funds Deposited	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Funds Disbursed	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Income	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Expense	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Closing Balance</b>	\$ 0.00	\$ 0.00	[REDACTED]	[REDACTED]	[REDACTED]

Cost Basis As Of - 12/31/19 \*\*  
Unrealized Gains  
Unrealized Losses  
Funds Deposited/(Disbursed) YTD  
Income/(Expense) YTD  
Securities Received/(Delivered) YTD

\*\*To view realized gains and losses for your account, login at www.tdameritrade.com and visit My Account > Gain/Loss.

















Statement Reporting Period:  
12/01/19 - 12/31/19

800-669-3900  
TD AMERITRADE  
DIVISION OF TD AMERITRADE INC  
PO BOX 2209  
OMAHA, NE 68103-2209  
TD Ameritrade Clearing, Inc., Member SIPC

Statement for Account # [REDACTED]  
ANDREW KAUFMAN ROTH IRA TD  
AMERITRADE CLEARING, CUSTODIAN  
255 W 94TH ST APT 17E  
NEW YORK, NY 10025-9651

Investment	Current Value	Prior Value	Period Change	% Change	Portfolio Allocation
Cash	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Instrd Dep Acct (IDA)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Money Market	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Short Balance	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Stocks	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Short Stocks	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Fixed Income	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Options	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Short Options	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Mutual Funds	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Total</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Margin Equity</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

	Current	YTD	2019 PTD	2019 YTD	2018 YTD	Cost Basis As Of - 12/31/19 **
Opening Balance	[REDACTED]	[REDACTED]	\$ -	\$ -	\$ -	[REDACTED]
Securities Purchased	[REDACTED]	[REDACTED]	-	-	-	Unrealized Gains
Securities Sold	[REDACTED]	[REDACTED]	-	-	-	Unrealized Losses
Contributions	[REDACTED]	[REDACTED]	-	-	-	Funds Deposited/(Disbursed) <sup>YTD</sup>
Distributions	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Income/(Expense) <sup>YTD</sup>
Income	[REDACTED]	[REDACTED]	-	-	-	Securities Received/(Delivered) <sup>YTD</sup>
Expense	[REDACTED]	[REDACTED]	-	-	-	
Other	[REDACTED]	[REDACTED]	-	-	-	
<b>Closing Balance</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	

\*\*To view realized gains and losses for your account, login at [www.tdameritrade.com](http://www.tdameritrade.com) and visit My Account > Gain/Loss.

Statement for Account # [REDACTED]  
 12/01/19 - 12/31/19

Current

Description  
 Interest Income - Securities  
 Non Taxable Interest  
 Ordinary Dividends  
 Interest Income Credit Balance  
 Short Term Capital Gains  
 Long Term Capital Gains  
 Cash Liquidation  
 Qualified Dividends  
 Money Market Fund Dividends

\*This section displays current and year to date taxation values for this account. The current totals may not equate to the total payments listed on this statement as corrections to tax reporting may also be included. These corrections can include changes made to previous payments and removal of payments reportable in a previous tax year (spillover dividends). The year to date totals will accurately reflect your cumulative amount for the year.

Investment Description	Symbol/ CUSIP	Quantity	Current Price	Market Value	Purchase Date	Cost Basis	Average Cost	Unrealized Gain(Loss)	Estimated Income	Yield
Stocks - Margin	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
DBM GLOBAL INC	DBMG	4,602	58.00	266,916.00	12/06/12	116,881.89	25.40	150,034.11	[REDACTED]	[REDACTED]
COM	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]







**Vanguard Flagship Services®**  
 Flagship Services: 800-345-1344

Roth IRA brokerage account—  
 Andrew D Kaufman

**Balances and holdings for Vanguard Brokerage Account — continued**

**Stocks**

Symbol	Name	Total cost	Quantity	Price on 12/31/2019	Balance on 12/31/2018	Balance on 12/31/2019
	[REDACTED]					
	[REDACTED]					
	[REDACTED]					
	[REDACTED]					
DBMG	DBM GLOBAL INC Est. annual income: \$1,026.00. Est. yield: 5.90%	14,100.00	300.0000	58.0000	13,500.00	17,400.00
	[REDACTED]					
	[REDACTED]					
	[REDACTED]					
	[REDACTED]					
	[REDACTED]					

# **EXHIBIT D**

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

**AFFIDAVIT OF CEDAR CREK PARTNERS LLC  
IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED**

State of Washington )  
 ) ss.:  
County of Whatcom )

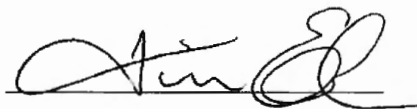
Tim Eriksen, Managing Member of Cedar Creek Partners, LLC being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 14,026 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

<u>Shares</u>	<u>Broker/Custodian/Other Records</u>
14,026	BTIG, LLC (Goldman Sachs & Co)

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

Dated: January 22, 2020



Sworn to before me this  
\_\_\_\_ of January, 2020

\_\_\_\_\_  
Notary Public

My Commission Expires:



**POSITIONS**  
**Cedar Creek Partners LLC**  
**7VBH**

Period End: Jan 21, 2020  
 Base Currency: U.S. DOLLAR

Account	Style	Long	Short	Quantity	Symbol	Security	Local Currency	Local Unit Cost	Local Price	Local Total Cost	Local Market Value	Local Accrued Int.	Base Unrealized Gain/Loss	Local Unrealized Total Gains
Cedar Creek Partners LLC	Long			14,026	DBHG	DBM GLOBAL	USD C	32.4139	67.0000	454,637.00	939,742.00	0.00	0.00	485,105.00
										<b>454,637.00</b>	<b>939,742.00</b>	<b>0.00</b>	<b>0.00</b>	<b>485,105.00</b>
														<b>106.70%</b>

# **EXHIBIT E**

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

**AFFIDAVIT OF Sheila and Joel Pitcoff**  
**IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED**

State of Michigan )  
 ) ss.:  
County of Wayne )

Sheila and Joel Pitcoff being duly sworn, depose and say:

1. We are ~~for~~ the beneficial owner<sup>s</sup>, or authorized to act for the beneficial owner, of a total 10,800 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

<u>Shares</u>	<u>Broker/Custodian/Other Records</u>	<u>Account Name</u>
<u>300</u>	<u>Wells Fargo Advisors</u>	<u>Pitcoff Educational Trust</u>
<u>10,500</u>	<u>Wells Fargo Advisors</u>	<u>Joel + Sheila Pitcoff</u>

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

Dated: January 21, 2020

Sheila Pitcoff  
Joel Pitcoff

Sworn to before me this  
21<sup>st</sup> of January, 2020

Margaret M Becker  
Notary Public

My Commission Expires:





# SNAPSHOT Current period ending December 31, 2019

ACCOUNT NAME: PITCOFF EDUCATIONAL TR  
JOEL H. PITCOFF TTEE  
SHEILA PITCOFF TTEE  
U/A DTD 12/30/1998

ACCOUNT NUMBER:

Your Financial Advisor:  
  
Phone: 248-737-8868 / 800-537-4509  
27755 STANSBURY BLVD  
STE 275  
FARMINGTON HILLS MI 48334

If you have more than one account with us, why not link them and receive summary information for your entire household? Contact Your Financial Advisor for more details.

### Message from Wells Fargo Advisors

AGAINST THE BACKDROP OF AN AGING ECONOMIC EXPANSION, HOW CAN INVESTORS BETTER PREPARE FOR THE UNKNOWN? FIND OUT WHAT OUR STRATEGISTS THINK IN OUR REPORT, 2020 OUTLOOK-A CALL FOR RESILIENCE. VISIT [WELLSFARGOADVISORS.COM/OUTLOOK](http://WELLSFARGOADVISORS.COM/OUTLOOK) TO DOWNLOAD YOUR FREE COPY.

0007673 02 AB 0412 \*AUTO 16 09910 48203-143131 <03-P07680-12  
PITCOFF EDUCATIONAL TR  
JOEL H. PITCOFF TTEE  
SHEILA PITCOFF TTEE  
U/A DTD 12/30/1998  
19631 ARGYLE CRESCENT  
DETROIT MI 48203-1431



Wells Fargo Advisors is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

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- Not Insured by the FDIC or Any Federal Government Agency
- Not a Deposit or Other Obligation of, or Guaranteed by, the Bank or Any Bank Affiliate
- Subject to Investment Risks, Including Possible Loss of the Principal Amount Invested



PITCOFF EDUCATIONAL TR  
 JOEL H. PITCOFF TTEE  
 SHEILA PITCOFF TTEE  
 U/A DTD 12/30/1998  
 DECEMBER 1, 2018 - DECEMBER 31, 2019  
 ACCOUNT NUMBER: 6611111111

**Stocks, options & ETFs**  
 Stocks and ETFs continued

DESCRIPTION	QUANTITY	ADJ PRICE/ ORIG PRICE	ADJ COST/ ORIG COST	CURRENT PRICE	CURRENT MARKET VALUE	UNREALIZED GAIN/LOSS	ESTIMATED	
							ANNUAL INCOME	ANNUAL YIELD (%)
DBM GLOBAL INC								
DBMG - HELD IN MARGIN								
Acquired 10/31/07 nc	300	29.75	9,132.50	58.0000	17,400.00	8,267.50	N/A	N/A
MERCURY SYSTEMS INC								
MERCY								
Acquired 07/15/00 nc	300	28.77	8,631.12	69.1100	20,733.00	12,101.88	N/A	N/A
US GOLD CORP								
COM PAR \$ NEW 2017								
USAU - HELD IN MARGIN								
Acquired 10/23/00 nc	5.40000	1,381.45	7,459.87		4.36	-7,455.51		
Acquired 12/01/00 nc	5.40000	1,381.66	7,461.00		4.35	-5,330.32		
Acquired 06/20/01 nc	16.20000	987.90	5,334.67		13.07	-11,741.22		
		988.11	5,335.80					
		725.57	11,754.29					
		726.78	11,757.66					
<b>Total</b>	<b>27</b>	<b>\$909.22</b>	<b>\$24,548.83</b>	<b>0.8069</b>	<b>\$21.78</b>	<b>-\$24,527.05</b>	<b>N/A</b>	<b>N/A</b>
<b>Total Stocks and ETFs</b>		<b>\$909.42</b>	<b>\$24,554.46</b>					
			<b>\$60,280.49</b>		<b>\$457,464.78</b>	<b>\$397,184.29</b>	<b>\$4,424</b>	<b>0.97</b>
			<b>\$60,286.12</b>					
<b>Total Stocks, options &amp; ETFs</b>			<b>\$60,280.49</b>		<b>\$457,464.78</b>	<b>\$397,184.29</b>	<b>\$4,424</b>	<b>0.97</b>

nc Cost information for this tax lot is not covered by IRS reporting requirements. Unless indicated, cost for all other lots will be reported to the IRS.

**Activity detail**

DATE	ACCOUNT TYPE	TRANSACTION	QUANTITY	DESCRIPTION	PRICE	AMOUNT	CASH AND SWEEP BALANCES
12/01				BEGINNING BALANCE			19,505.12
12/31	Cash	INTEREST		STANDARD BANK DEPOSIT 123119 19,505		1.01	19,506.13



# SNAPSHOT Current period ending December 31, 2019

ACCOUNT NAME: JOEL PITCOFF & SHEILA PITCOFF JT WROS

ACCOUNT NUMBER: [REDACTED]

Your Financial Advisor: [REDACTED]  
Phone: 248-737-8868 / 800-537-4509

27755 STANSBURY BLVD  
STE 275  
FARMINGTON HILLS MI 48334

0007682 03 AR 0412 \*\*AUTO TS 0810 48203-143131 -C03-P07689-112  
JOEL PITCOFF &  
SHEILA PITCOFF JT WROS  
19631 ARGYLE CRESCENT  
DETROIT MI 48203-1431



If you have more than one account with us, why not link them and receive summary information for your entire household? Contact Your Financial Advisor for more details.

### Message from Wells Fargo Advisors

AGAINST THE BACKDROP OF AN AGING ECONOMIC EXPANSION, HOW CAN INVESTORS BETTER PREPARE FOR THE UNKNOWN? FIND OUT WHAT OUR STRATEGISTS THINK IN OUR REPORT, 2020 OUTLOOK-A CALL FOR RESILIENCE. VISIT WELLSFARGOADVISORS.COM/OUTLOOK TO DOWNLOAD YOUR FREE COPY.

\* IMPORTANT NOTE: See enclosed Information Verification form.

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#### Investment and Insurance Products are:

- Not Insured by the FDIC or Any Federal Government Agency
- Not a Deposit or Other Obligation of, or Guaranteed by, the Bank or Any Bank Affiliate
- Subject to Investment Risks, Including Possible Loss of the Principal Amount Invested

JOEL PITCOFF &  
SHEILA PITCOFF JT WIROS

DECEMBER 1, 2019 - DECEMBER 31, 2019  
ACCOUNT NUMBER: ██████████

**Portfolio detail**  
**Cash and Sweep Balances**

DESCRIPTION	CURRENT MARKET VALUE
Margin/loan balance	180,279.24

**Stocks, options & ETFs**

**Stocks and ETFs**

DESCRIPTION	QUANTITY	ADJ PRICE/ ORIG PRICE	ADJ COST/ ORIG COST	CURRENT PRICE	CURRENT MARKET VALUE	UNREALIZED GAIN/LOSS	ESTIMATED	
							ANNUAL INCOME	ANNUAL YIELD (%)
DBM GLOBAL INC NC	10,500	3.69**	38,772.43	58.0000	609,000.00	570,227.57	N/A	N/A
DBMG - HELD IN MARGIN								
<b>Total Stocks and ETFs</b>			<b>\$38,772.43</b>		<b>\$609,000.00</b>	<b>\$570,227.57</b>		
<b>Total Stocks, options &amp; ETFs</b>			<b>\$38,772.43</b>		<b>\$609,000.00</b>	<b>\$570,227.57</b>		

\*\* Because you have more than 6 tax lots, we are showing the average cost per share.  
nc Cost information for this tax lot is not covered by IRS reporting requirements. Unless indicated, cost for all other lots will be reported to the IRS.

**Specific instructions and disclosures**

**Margin accounts**

Interest charged on debit balances in your margin account appears on this statement. The rate of interest and period covered are indicated. The rate may change from time to time due to interest rate fluctuations or for other reasons. Interest is computed as described in material previously furnished to you. This is a combined statement of your general account and the Special Memorandum Account maintained for you under Section 220.5 of Regulation T issued by the Board of Governors of the Federal Reserve Board. The permanent record of the separate account, as required by Regulation T, is available for your inspection.

**Cost basis - To add or update information or modify your reporting options, please contact Your Financial Advisor.**

This statement presents estimated unrealized or realized gains or losses for your information only. If acquisition or other information is not available, the gain/loss information may not be displayed and summary totals may not reflect your complete portfolio. Cost basis information is not verified by Wells Fargo Advisors and should not be relied upon for legal or tax purposes. Revisions to this information (due to corporate mergers, tenders and other reorganizations) may be required from time to time.

Cost basis for factored bonds (GNMA, CMO, etc.) will be adjusted for payout of principal. Systematic investments in mutual funds and reinvested dividends for mutual funds and stocks have been consolidated for each position. Unit cost data for systematic investments and dividend reinvestment securities is provided for informational purposes only and is a non-weighted average.

Your account statement should not be used for tax preparation without assistance from your tax consultant. We do not report capital gains or losses for non-covered securities to the IRS.

**Cost basis options**

Unless specific tax lots are selected at trade time, sales of tax lots will occur using the cost basis election reflected in the Account profile section.



# **EXHIBIT F**



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

AFFIDAVIT OF Adam Gross  
IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED

State of Texas )

) ss.:

County of Harris )

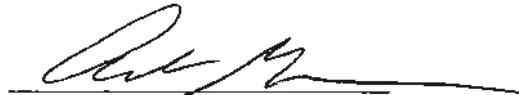
Adam Gross, being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 7614 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

Shares	Broker/Custodian/Other Records
<u>670</u>	<u>Fidelity</u>
<u>6944</u>	<u>TD Ameritrade</u>

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

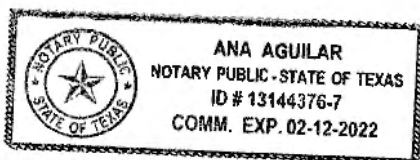
Dated: January 23, 2020



Sworn to before me this 23 of January, 2020

ANA AGUILAR  
Notary Public

My Commission Expires: 2/12/2022





Account: [REDACTED]  
 ADAM P GROSS &  
 KARA GROSS JT TEN  
 JOINT TENANTS WROS

Reporting Period: November 1 - 30, 2019

**MONTHLY STATEMENT**

**HOLDINGS DETAIL (continued)**

**STOCKS**

STOCKS held as a short position will show a negative Quantity and Market Value.

Investment Description	Symbol/ CUSIP	Quantity	Closing Price	Market Value
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
DBM GLOBAL INC	DBMG	6,944	50.70	350,324.80
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
COM				

Questions? Consult your Independent Advisor:  
 ADVISORY SERVICES NETWORK LLC (770) 352-0120





# **EXHIBIT G**

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SCHUFF INTERNATIONAL, INC. ) CONSOLIDATED  
STOCKHOLDERS LITIGATION ) C.A. NO. 10323-VCZ

AFFIDAVIT OF Robert Tera  
IN SUPPORT OF OBJECTION BY FAIR VALUE INVESTMENTS INCORPORATED

State of Michigan )

) ss.:

County of Oakland

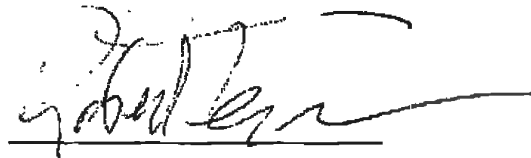
Robert Tera being duly sworn, deposes and says:

1. I am the beneficial owner, or authorized to act for the beneficial owner, of a total 4,202 shares of common stock of DBM Global, Inc. (formerly known as Schuff International, Inc.), which are held in the following account(s) as confirmed in the most recent brokerage or custodial statement(s) or other ownership records attached hereto:

<u>Shares</u>	<u>Broker/Custodian/Other Records</u>
4,202	Robert Tera IRA
_____	_____
_____	_____

2. I have reviewed the Objection by Fair Value Investments, Incorporated to the proposed settlement embodied in the November 15, 2019 Stipulation and Agreement of Settlement Compromise, Settlement and Release and the brief in support. I join and support the foregoing objection.

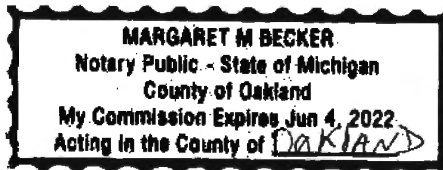
Dated: January 22, 2020



Sworn to before me this  
22<sup>nd</sup> of January, 2020

Margaret M Becker  
Notary Public

My Commission Expires:



**64.00** \*  
 DBMGS  
 DBMGS GLOBAL INC  
 B 64.00 x 100  
 A 70.00 x 100  
 V 0

Open: 64.00  
 Day Range: 64.00 - 64.00  
 Ex Div Date: 11/19/2018  
 P/E Ratio: 8.00  
 Div/Yield: 3.42 / 0.00%  
 52 Wk Hi: 70.00 (6/17/2020)  
 52 Wk Lo: 45.15 (2/26/2019)  
 10-Day Vol: 222  
 Close: 64.00 (11/16/2020)

Today's Volume: 249,000  
 Market Value: \$376,886.72  
 Today's Gain: \$24,663.05 (-)

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Alerts: DBMGS 64.00 \$  
 1 V 0 HV20 -- IV50 --

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 Investment Products

### RT IRA

Brokerage: 484914380 Routing Number  
 AS OF 11/12/2020 5:17 PM ET

Investment Accounts	Positions	Balances	Activity & Orders	Analysis	More...
RT Standard Account X15557926					
Retirement Accounts					
RT Roth IRA 224324000					
RT Small IRA 484372510					
RT REX-GH 484373249					
RT IRA 484814980					
Authorized Accounts					
DBMGS					
DBMGS GLOBAL INC					

Symbol	Last Price	Today's Gain/Loss	Total Gain/Loss	Current Value	Quantity
FDRXX** FIDELITY GOVERN...	\$1.00	n/a	n/a	\$480,057.58	480,057.580
257781103 DONLAR CORP NE	n/a	n/a	n/a	n/a	3,900.000
ACMR ACM RESEARCH I	\$42.870	+858.00	+\$1,824.00	\$4,267.00	100.000
APOG APOGEE ENTERP.	\$33.800	-\$216.00	-\$4,487.07	\$13,520.00	400.000
CAE CAE INC COMM ISM	\$28.300	-\$485.00	+\$14,599.85	\$43,950.00	1,500.000
CHK CHESAPEAKE ENE	\$0.897	-\$323.50	-\$1,653.88	\$2,983.00	5,000.000
DBMGS DBM GLOBAL INC	\$54.00	\$0.00*	+\$198,852.18	\$268,928.00	4,202.000

2020 BAL 50 Cash at Market  
 DBMGS 64.00 0.00 4.202 15.728

Tickler: DJI 25,195.04 (0.12%)  
 NYSE 3,320.75 (0.14%)  
 S&P 3,370.807 (0.14%)  
 VIX 11.11 (0.12%)

Type here to search