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1900 N. 900 -

February 27, 2020

VIA FILE & SERVEXPRESS AND HAND DELIVERY

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

Re: In re Schuff International Inc. Stockholders Litigation, Consol. C.A. No. 10323-VCZ

Dear Vice Chancellor Zurn:

I write on behalf of the parties to update the Court on the current status of the above-referenced action (the "Action"). Near the conclusion of the February 13, 2020 settlement hearing, the Court asked the parties whether they preferred the Court to rule on the proposed settlement as presented or engage in further discussions among themselves to determine if they could address concerns the Court raised during the hearing. (Tr. at 78-79). Counsel for plaintiff informed the Court that the parties would engage in further discussions and would provide an update to the Court within two weeks. (Tr. at 80).

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Since the hearing, the parties to the Action have engaged in active discussions.

Those discussions are continuing and the parties are hopeful that they will have a proposal for the Court's consideration within the next two weeks.

Accordingly, the parties respectfully request the Court to continue to reserve judgment and permit the parties an additional two weeks to continue their discussions. With the Court's permission, the parties will notify the Court of the status of this Action on or before March 12, 2020.

Should Your Honor have any questions, counsel are available at the Court's convenience.

Respectfully,

/s/ Seth D. Rigrodsky

Seth D. Rigrodsky (#3147)

Words: 200

SDR/lw

IT IS SO ORDERED

cc: Register in Chancery (via File & ServeXpress)
Kevin G. Abrams, Esquire (via File & ServeXpress)
Kurt M. Heyman, Esquire (via File & ServeXpress)
Peter B. Ladig, Esquire (via File & ServeXpress)
Kelly A. Terribile, Esquire (via File & ServeXpress)

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