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April 3, 2020

**VIA FILE & SERVEEXPRESS
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 to update the Court on the current status of the above-referenced action (the "Action"). On March 12, 2020, the HC2 Defendants submitted a letter to the Court, advising that the parties' discussions concerning a potential amended settlement of this Action were continuing, and undertaking to update the Court again on or before April 3, 2020. The Court entered the letter as "So Ordered" on March 13, 2020.


Since the parties' last status letter, Plaintiff and Defendants have continued to engage in active discussions. Those discussions are continuing, and the parties are hopeful that they will reach agreement in principle upon an amended settlement

within the next two weeks.

Accordingly, the parties respectfully request that the Court continue to reserve judgment and permit them an additional two weeks to continue discussions. With the Court's permission, the parties will notify the Court of the status of this Action on or before April 17, 2020.

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

IT IS SO ORDERED


April 6, 2020

Respectfully,

/s/ Seth D. Rigrodsky

Seth D. Rigrodsky (#3147)

Words: 171

SDR/lw

cc: Register in Chancery (via File & ServeXpress)
Kevin G. Abrams, Esquire (via File & ServeXpress)
Kurt M. Heyman, Esquire (via File & ServeXpress)
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