

April 15, 2020

Mr. Gary Lutin Fair Value Investments, Inc. 575 Madison Avenue, 10th Floor New York, NY 10022

Re: Schuff Int'l, Inc. S'holders Litig., Consol. C.A. No. 10323-VCZ (Del. Ch.)

Dear Mr. Lutin:

I am responding on behalf of HC2 Holdings, Inc. ("HC2") to your April 7, 2020 letter proposing to settle the Schuff stockholder litigation based on the exchange by the public stockholders of DBM Global, Inc. ("DBM") of their DBM common shares for a new series of DBM preferred stock with the designations contained in your letter.

Your proposed designations for the DBM preferred stock are so unfairly weighted in favor of the DBM common stockholders that no majority stockholder in this context would ever consider such preferences. HC2 does not see any possibility that your proposal or any variation would be approved by HC2. HC2 also continues to believe that HC2 and the DBM stockholders should be focusing on more productive and potentially rewarding options.

In the event you have a sensible and balanced proposal to settle the Schuff stockholder litigation, HC2 reiterates its multiple requests over the last several weeks that you present a framework for immediate consideration.

Sincerely

Joseph A. Ferraro

JAF/ab

cc: Robert J. Kriner, Jr., Esq,

Philip A. Falcone