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April 17, 2020

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

Re: *IMO: Schuff Int'l Inc. S'holders Litig.*
C.A. No. 10323-VCZ

Dear Vice Chancellor Zurn:

I am writing on behalf of all parties to the above-referenced action to report that, after extensive consideration of multiple alternatives and intensive negotiations, the parties have reached an agreement-in-principle for an amended settlement of this litigation.

The parties expect to file an amended settlement agreement with the Court by the end of this month. At that time, the parties will request the entry by the Court of a scheduling order to authorize the distribution of a revised settlement notice and to set a briefing schedule and the date for a settlement hearing.

As always, counsel for the parties are available at the convenience of the Court in the event Your Honor has any questions.

The Honorable Morgan T. Zurn
April 17, 2020
Page 2

Respectfully,

/s/ J. Peter Shindel, Jr.

J. Peter Shindel, Jr. (#5825)

Words: 115

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cc: Register in Chancery (via File & ServeXpress)
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