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Transaction ID 65725710
Case No. 10323-VCZ



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

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

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME
FOR OBJECTOR FAIR VALUE INVESTMENTS INCORPORATED
TO FILE OBJECTION TO REVISED SETTLEMENT**

WHEREAS, on November 15, 2019, the parties to this action filed a Stipulation and Agreement of Compromise, Settlement, and Release (“Original Settlement”). (Trans. ID 94436578);

WHEREAS, on January 24 and 27, 2020, AB Value Partners, L.P.—the owner of 75,482 shares of DBM Global Inc. (“DBMG”) common stock (“AB Value”)—and Fair Value Investments Incorporated (“FVI”)—the owner of ten shares of DBMG common stock—filed their Objections to the Original Settlement. (Trans. ID 64655731, 64659016, 64660194);

WHEREAS, at the conclusion of the February 13, 2020 hearing on whether to approve the Original Settlement, the parties requested additional time to consider a revised settlement framework. (Transcript at 80);

WHEREAS, on May 8, 2020, the parties filed a revised Stipulation and Agreement of Compromise, Settlement, and Release (“Revised Settlement”) and, on the same day, AB Value notified the Court that AB Value would not object to the Revised Settlement. (Trans. ID 65626502, 65626339);

WHEREAS, On May 12, 2020, the Court entered a Scheduling Order with respect to the Revised Settlement, which provided that any objector would be required to file an objection to the Revised Settlement on or before June 26, 2020; (Trans. ID 65632579);

WHEREAS, on May 21, 2020, the Court granted Plaintiff's unopposed motion to file Plaintiff's opening settlement brief on June 5, 2020—a ten day extension. (Trans. ID 65649604);

WHEREAS, on June 23, 2020, FVI filed its Motion for Enlargement of Time to File Objection to Revised Settlement in which FVI requested a three week (21 day) extension to the deadline for objections until July 17, 2020 (Trans. ID 65715142) (“FVI’s Motion”);

WHEREAS, on June 23, 2020, HC2 Holdings, Inc. (“HC2”) filed its Opposition to Fair Value’s Objection Extension Request, in which it stated that FVI’s proposal was unduly burdensome to the parties because FVI would have 70 days from the filing of the Revised Settlement and the parties would have only 11 days to respond to any objection;

WHEREAS, HC2 advised FVI and the Court that HC2 does not oppose an 11 day extension of the FVI objections deadline until July 7, 2020 (Trans. ID 65719841); and

WHEREAS, counsel for FVI and the parties have conferred and agreed to

modify the existing deadline for FVI to file any objection to the Revised Settlement;

IT IS HEREBY STIPULATED AND AGREED by FVI and the parties hereto, through their undersigned counsel, and subject to the Court's approval, as follows:

1. FVI's Motion is hereby withdrawn.
2. Any objection by FVI to the Revised Settlement shall be filed on or

before July 7, 2020.

SO STIPULATED AMONG COUNSEL:

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Dated: June 25, 2020

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IT IS SO ORDERED this _____ day of _____, 2020.

Vice Chancellor Morgan T. Zurn

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Morgan Zurn

File & Serve

Transaction ID: 65724552

Current Date: Jun 25, 2020

Case Number: 10323-VCZ

Case Name: CONF ORD ON DISC - CONS W/ CA 10359 VCL IMO Schuff International Inc
Stockholders Litigation

Court Authorizer: Morgan Zurn

/s/ Judge Morgan Zurn