IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

SGR WINDDOWN, INC., et al., 1 Case No. 19-11973 (MFW)

> Debtors. (Jointly Administered)

> > Hearing Date: February 18, 2020 at 3:00 p.m. (ET) Obj. Deadline: February 14, 2020 at 4:00 p.m. (ET)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT on February 7, 2020, the above-captioned Debtors and Debtors-in-Possession (the "Debtors"), by and through their undersigned counsel, filed (I) Motion for Authorization of Payment of Defense Costs Under Insurance Policy and Related Relief (the "Motion") [D.I. 489], and (II) Debtors' Motion to Shorten Notice Period with respect to the Motion (the "Motion to Shorten") [D.I. 490] with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that on February 10, 2020, the Court entered the Order granting the Motion to Shorten (the "Order") [D.I. 491]. As indicated in the Order, the Court set the deadline to respond to the Motion as February 14, 2020 at 4:00 p.m. (ET) (the "Objection Deadline") and scheduled the hearing on the Motion for February 18, 2020 at 3:00 p.m. (ET) before The Honorable Mary F. Walrath, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court and served upon, so as to be received by, the undersigned proposed counsel on or before February 14, 2020 at 4:00 p.m. (ET). At the same time, you must also serve a copy of the response upon the Debtor's counsel:

Alan J. Friedman, Esq. Brya M. Keilson, Esq. Ryan O'Dea, Esq. Eric J. Monzo, Esq. SHULMAN BASTIAN LLP MORRIS JAMES LLP

100 Spectrum Center Drive, Suite 600 500 Delaware Avenue, Suite 1500

Irvine, CA 92618

Wilmington, DE 19801 Telephone: (949) 427-1654 Telephone: (302) 888-6959 Facsimile: (949) 340-3000 Facsimile: (302) 571-1750

E-mail: afriedman@shbllp.com E-mail: bkeilson@morrisjames.com E-mail: rodea@shbllp.com E-mail: emonzo@morrisjames.com

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or Canadian Revenue Agency, as applicable are (1) SGR Winddown, Inc., a Delaware corporation (4356), (2) SGR Winddown International, LLC, a Delaware limited liability company (1254), and (3) SGR Canada Winddown Legacy, Ltd. (4480). The location of the Debtors' corporate headquarters is 1700 E. Walnut Ave, 5th Floor, El Segundo, California 90245

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

DATED: February 10, 2020 MORRIS JAMES LLP

/s/ Brya M. Keilson

Brya M. Keilson, Esquire (DE Bar No. 4643) Eric J. Monzo, Esquire (DE Bar No. 5214) 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801

Telephone: (302) 888-6800 Facsimile: (302) 571-1750

E-mail: bkeilson@morrisjames.com E-mail: emonzo@morrisjames.com

and

SHULMAN BASTIAN LLP

Alan J. Friedman, Esquire Ryan O'Dea, Esquire 100 Spectrum Center Drive, Suite 600 Irvine, CA 92618

Telephone: (949) 427-1654 Facsimile: (949) 340-3000 E-mail: afriedman@shbllp.com E-mail: rodea@shbllp.com

Counsel to the Debtors