

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SGR WINDDOWN, INC., et al.,¹

Debtors.

Chapter 11

Case No. 19-11973 (MFW)

(Jointly Administered)

Hearing Date: December 19, 2019 at 11:30 a.m. (ET)

Obj. Deadline: December 16, 2019 at 4:00 p.m. (ET)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT on December 2, 2019, the above-captioned Debtors and Debtors-in-Possession (the “Debtors”), by and through their undersigned counsel, filed the *Motion of SGR Winddown, Inc. et al. for an Order Extending the Period to Remove Actions Pursuant to 28 U.S.C. § 1452 and Federal Rule of Bankruptcy Procedure 9027* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that 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 **December 16, 2019 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must also serve a copy of the response upon the Debtor’s counsel:

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PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion is scheduled for **December 19, 2019 at 11:30 a.m. prevailing Eastern Time** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801.

¹ 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: December 2, 2019

MORRIS JAMES LLP

/s/ Brya M. Keilson

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