IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
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SGR WINDDOWN, INC., et al., Case No. 19-11973 (MFW) (Jointly Administered)

Debtors.¹

Objection Deadline: January 2, 2020 at 4:00 p.m. (ET)

NOTICE OF FIRST INTERIM FEE APPLICATION OF BMC GROUP, INC., FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS ADMINISTRATIVE AGENT TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR THE PERIOD FROM SEPTEMBER 6, 2019 THROUGH NOVEMBER 30, 2019

PLEASE TAKE NOTICE that, on December 13, 2019, BMC Group, Inc. ("BMC"), as Administrative Agent to the debtors and debtors-in-possession (the "Debtors"), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 198] (the "Compensation Order") filed their First Interim Fee Application for Compensation and Reimbursement of Expenses for the Services Rendered for the Period from September 6, 2019 through November 30, 2019 (the "Application").

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **January 2, 2020 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon Debtors' counsel:

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Ryan O'Dea, Esq.

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PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN ALL UNPAID FEES TO DATE, INCLUDING ANY 20% HOLDBACK, MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

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. (4356), (2) SGR Winddown International, LLC (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.

A HEARING ON THE APPLICATION WILL BE HELD AT A DATE AND TIME TO BE SCHEDULED BY THE COURT.

DATED: December 13, 2019 MORRIS JAMES LLP

/s/ Brya M. Keilson

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