

SO ORDERED




THOMAS J. CATLIOTA
U.S. BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: TECHNOLOGY SPECIALISTS, INC., Debtor.	Chapter 11 Case No.: 15-17311 (TJC)
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**ORDER (I) APPROVING AMENDED DISCLOSURE STATEMENT PURSUANT TO
SECTION 1125 OF THE BANKRUPTCY CODE WITH RESPECT TO
JOINT AMENDED PLAN OF REORGANIZATION; AND (II) SCHEDULING
CONFIRMATION HEARING AND ESTABLISHING VOTING PROCEDURES AND
DEADLINES WITH RESPECT TO CONFIRMATION**

Upon consideration of the Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Joint Amended Plan of Reorganization [Docket No. 161] (including all exhibits thereto) (as amended, modified or supplemented from time to time, the “Disclosure Statement”);¹ the Court having conducted a hearing on approval of the Disclosure Statement (the “Disclosure Statement Hearing”); and it appearing that adequate and sufficient notice of the Disclosure Statement Hearing was provided and no other or further notice need be provided, and upon the record at the Disclosure Statement Hearing and all the proceedings

¹ All capitalized terms not otherwise defined in this Order have the meaning ascribed to them in the Disclosure Statement.

before the Court in this Chapter 11 case, and no objections to approval of the Disclosure Statement having been filed; and the Court having found that the Disclosure Statement contains adequate information pursuant to Section 1125 of the United States Bankruptcy Code (the “Bankruptcy Code”); it is HEREBY ORDERED, that:

1. The Disclosure Statement is approved in all respects pursuant to Section 1125 of the Bankruptcy Code and Fed. R. Bankr. P. (“Bankruptcy Rule”) 3017(b).

2. On or before **October 20, 2016** (the “Solicitation Commencement Date”), the Debtor shall commence the solicitation and noticing process by placing the solicitation materials and notices approved in this Order in the mail, first-class postage prepaid.

3. The date by which the ballots cast to accept or reject the Plan must be received by the Debtor is **November 17, 2016 at 5:00 p.m. (Eastern Time)** (the “Voting Deadline”).

4. The solicitation materials to be transmitted on or before the Solicitation Commencement Date to those known holders of claims in Class 2 that are entitled to vote on the Plan, as described in paragraph 5 below, shall include the following: (a) this Order; (b) the Disclosure Statement and its exhibits (including the Plan); (c) a ballot, the approved form of which is attached hereto as **Exhibit A** (“Ballot”); (d) a pre-addressed, postage prepaid return envelope; and (e) a notice of the confirmation hearing (the “Notice of Hearing”) substantially in the form attached hereto as **Exhibit B** (collectively, the “Solicitation Package”).

5. The following holders of claims in Class 2 (General Unsecured Claims) shall be permitted to vote on the Plan and shall receive the Solicitation Package: (i) creditors listed on Schedule F (Creditors Holding Unsecured Nonpriority Claims) of the Debtor’s Schedules [Docket No. 1] as holding a claim that is not listed as disputed, contingent or unliquidated; and (ii) any other entity that filed a proof of claim against the Debtor by the date of this Order, or an

amended proof of claim by the Voting Deadline, which asserts that at least some portion of the claim is entitled to treatment as a general unsecured nonpriority claim. Any creditor entitled to receive more than one ballot shall nevertheless be entitled to receive only one Solicitation Package with the appropriate number of ballots contained therein.

6. The Debtor shall mail, first-class postage prepaid, on or before the Solicitation Commencement Date, to holders of Administrative Claims, Priority Claims, and holders of non-voting claims in class 1 (Allowed Secured Tax Claims), a notice in substantially the form attached hereto as **Exhibit C** (the “Notice of Non-Voting Status”), in lieu of any documents contained in the Solicitation Package. Service of the Notice of Non-Voting Status on the holders of such unimpaired creditors satisfies the requirements of Bankruptcy Rule 3017(d).

7. The Debtor shall mail, first-class postage prepaid, on or before the Solicitation Commencement Date, to the holder of interests in Class 3 (Equity Interests) and counterparties to the Debtor’s executory contracts and unexpired leases listed in Amended Schedule G of the Debtors’ Schedules [Docket No. 61] that are not scheduled as a general unsecured creditor and that did not file a proof of claim and the executory contract counter-parties listed in Article 6.01 of the Plan, a copy of (x) this Order, (y) a Notice of Hearing and (z) the Disclosure Statement (with exhibits, including the Plan).

8. Nothing in this Order affects the Debtor’s right (or any other party’s right, if applicable) to object to any proof of claim. Moreover, nothing in this Order shall be considered an admission as to the allowability of any proof of claim for the purpose of distributions.

9. If any party wishes to have its claim allowed for purposes of voting on the Plan in a manner that is inconsistent with the Ballot it received or if any party that did not receive a ballot wishes to have its claim temporarily allowed for voting purposes only, such party must

serve on the Debtor and file with the Court, on or before **November 3, 2016**, a motion for an order pursuant to Bankruptcy Rule 3018(a) temporarily allowing such claim for purposes of voting (a “3018 Motion”). A 3018 Motion must set forth with particularity the amount and classification of which such party believes its claim should be allowed for voting purposes and the evidence to support its belief. If a 3018 Motion is filed, the Court will set a hearing on or before the Voting Deadline to consider the 3018 Motion. In respect of any timely-filed 3018 Motion, the ballot in question shall be counted in the amount established by the Court in an order entered on or before the Voting Deadline.

10. Notwithstanding anything contained in this Order to the contrary, the Debtor is not required to transmit the Solicitation Package or any other notices or this Order to (a) holders of claims listed on the Schedules, or any amendments thereto, that have already been paid in full during this case or that are authorized to be paid in full in the ordinary course of business pursuant to orders previously entered by this Court, (b) any person to whom the Debtor mailed papers that were returned marked “undeliverable” or “moved - no forwarding address” or for a similar reason, unless the Debtor has been informed in writing by such person of that person’s new address.

11. Unless otherwise directed by the Court, the Debtor shall follow the guidelines set forth below in tabulating the votes to accept or reject the Plan:

- (a) Subject to paragraph (b) below, any Ballot timely received by the Debtor that contains sufficient information to permit the identification of the claimant and that is cast as an acceptance or rejection of the Plan shall be counted and shall be deemed to be cast as an acceptance or rejection, as the case may be, of the Plan.
- (b) The following Ballots shall not be counted or considered for any purpose in determining whether the Plan has been accepted or rejected: (i) any Ballot received after the Voting Deadline unless the Voting Deadline is extended by further Order of this Court with respect to a particular claim; (ii) any Ballot that is illegible or contains insufficient information to

permit the identification of the claimant; (iii) any Ballot cast by a person or entity that does not hold a claim in a class that is entitled to vote to accept or reject the Plan; (iv) except as otherwise provided in this Order, any Ballot cast for a claim designated as disputed or as zero or unknown in amount; (v) any unsigned Ballot or ballot that has a non-original signature; or (vi) any Ballot timely received that is cast in a manner that indicates neither an acceptance nor rejection of the Plan or that indicates both an acceptance and rejection of the Plan.

- (c) Notwithstanding Bankruptcy Rule 3018(a), whenever two or more Ballots are cast voting the same claim prior to the Voting Deadline, the last dated Ballot received by the Debtor prior to the Voting Deadline shall be deemed to reflect the voter's intent and thus to supersede any prior Ballots, without prejudice to the Plan Proponents' rights (or the right of any other party, if applicable) to object to the validity of the last dated Ballot on any basis permitted by law, including under Bankruptcy Rule 3018(a), and, if the objection is sustained, to count the first dated ballot for all purposes.
- (d) Claim splitting shall not be permitted. Creditors that vote must vote all of their claims within a particular class either to accept or reject the Plan.
- (e) For purposes of the numerosity requirement of Section 1126(c) of the Bankruptcy Code, to the extent that it is possible to do so for all Voting Classes, separate Claims held by a single creditor in each Class against the Debtor will be aggregated as if such creditor held a single Claim in such Class against the Debtor, and the votes related to those Claims.
- (f) Any party that has delivered a valid Ballot for the acceptance or rejection of the Plan may withdraw such acceptance or rejection by delivering a written notice of withdrawal to the Debtor at any time prior to the Voting Deadline. A notice of withdrawal, to be valid, must (i) contain the description of the claim to which it relates and the aggregate principal amount represented by such claim, (ii) be signed by the withdrawing party in the same manner as the ballot being withdrawn, (iii) contain a certification that the withdrawing party owns the Claim(s) and possesses the right to withdraw the vote sought to be withdrawn and (iv) be received by the Debtor prior to the Voting Deadline.
- (g) Ballots may be returned to the Debtor by facsimile (301-982-9450) or electronic mail (sgoldberg@mhlawyers.com) provided that they are received prior to the Voting Deadline.
- (h) The Debtor has the authority but not the obligation to seek to cure deficient Ballots; provided, however, that if the Debtor seeks to cure one deficient Ballot, it then has the obligation to seek to cure all deficient Ballots.

12. The **hearing on confirmation** of the Plan (the “Confirmation Hearing”) shall be held on November 28, 2016 at 11:00 a.m. EST, before the Honorable Thomas J. Catliota, United States Bankruptcy Judge, United States Bankruptcy Court of the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770, provided, however, that the Confirmation Hearing may be adjourned from time to time without further notice to creditors or other parties in interest, other than by announcement of such an adjournment in open court.

13. **Objections** (including any accompanying briefs), if any, to confirmation of the Plan or proposed modifications to the Plan must (i) be in writing, (ii) state the name and address of the objecting party and the nature of the claim or interest of such party, (iii) state with particularity the basis and nature of any objection to confirmation of the Plan or proposed modification to the Plan; and (iv) be filed, together with proof of service, so as to be received no later than **November 17, 2016** by the Office of the Clerk, United States Bankruptcy Court for the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770, and each of the following parties:

Steven L. Goldberg, Esquire
McNamee, Hosea, Jernigan,
Kim, Greenan & Lynch, P.A.
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770

G. David Dean, Esquire
Cole Schotz P.C.
300 East Lombard Street, Suite 1450
Baltimore, Maryland 21202

Office of the United States Trustee for District of Maryland
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770
Attn: Lynn Kohen, Esquire

~~14. Any objections to confirmation of the Plan not timely filed and served in the manner set forth above shall not be considered and shall be overruled.~~

cc:

Steven L. Goldberg, Esquire
McNamee, Hosea, Jernigan,
Kim, Greenan & Lynch, P.A.
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770

G. David Dean, Esquire
Cole Schotz P.C.
300 East Lombard Street, Suite 1450
Baltimore, Maryland 21202

Office of the United States Trustee for District of
Maryland
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770
Attn: Lynn Kohen, Esquire

End of Order

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: TECHNOLOGY SPECIALISTS, INC., Debtor.	Chapter 11 Case No.: 15-17311 (TJC)
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CLASS 2 – GENERAL UNSECURED CLAIMS BALLOT

The above-captioned debtor and debtor in possession (the “**Debtor**”) and the Official Committee of Unsecured Creditors appointed in this case jointly filed the Joint Amended Plan of Reorganization [Dkt No. 161] (the “**Plan**”). This Ballot has been provided to you for your use in voting on the Plan.

In relation to your vote, on October ____, 2016, the Bankruptcy Court approved the Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Joint Amended Plan of Reorganization [Dkt. No. 161] (the “**Disclosure Statement**”). The Disclosure Statement provides information to assist you in deciding how to vote your Ballot. A copy of the Disclosure Statement has been provided to you along with this Ballot. If you do not have a copy of the Disclosure Statement, you may obtain a copy from counsel for the Debtor at: McNamee, Hosea, Jernigan, Kim, Greenan & Lynch, P.A., Attn: Steven L. Goldberg, Esquire, 6411 Ivy Lane, Suite 200, Greenbelt, Maryland 20770; sgoldberg@mhlawyers.com; (301) 441-2420. Please note that the Bankruptcy Court’s approval of the Disclosure Statement does not constitute the Bankruptcy Court’s approval or disapproval of the Plan.

YOU SHOULD REVIEW THE DISCLOSURE STATEMENT AND PLAN BEFORE YOU VOTE. YOU MAY ALSO WISH TO SEEK LEGAL ADVICE CONCERNING THE PLAN AND THE CLASSIFICATION AND TREATMENT OF YOUR CLAIM UNDER THE PLAN BEFORE COMPLETING THIS BALLOT. IF YOU HOLD CLAIMS IN MORE THAN ONE CLASS UNDER THE PLAN, YOU HAVE BEEN PROVIDED A SEPARATE BALLOT FOR EACH SUCH CLASS. THIS BALLOT IS TO BE USED SOLELY FOR VOTING IN RELATION TO YOUR CLASS 2 CLAIM.

BALLOTING DEADLINE

To have your vote on the Plan count, you must complete, sign and return this Ballot to counsel for the Debtor so that it is **actually received** by counsel for the Debtor by no later than **November 17, 2016**.

DELIVER BALLOTS TO:

By Overnight Carrier, United States Postal Service or Hand Delivery:
Steven L. Goldberg, Esq. McNamee, Hosea, Jernigan, Kim, Greenan & Lynch, P.A. 6411 Ivy Lane, Suite 200 Greenbelt, Maryland 20770

By Facsimile Transmission or E-mail
Fax No.: 301-982-9450 E-mail: sgoldberg@mhlawyers.com

If your Ballot is not received by counsel for the Debtor on or before November 17, 2016, and such deadline is not extended, your vote will not be counted. If the Bankruptcy Court confirms the Plan, the Plan will be binding on you whether or not you vote.

VOTE ON THE PLAN. You may check ONE box to accept or reject the Plan.²

☐ to ACCEPT the Plan

☐ to REJECT the Plan

² The amount of your claim for voting purposes will be calculated by counsel for the Debtor according to the terms provided in the Order (I) Approving Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Joint Plan of Reorganization; and (II) Scheduling Confirmation Hearing and Establishing Voting Procedures and Deadlines with Respect to Confirmation (the "**Solicitation Order**"). A copy of the Solicitation Order is being provided to you contemporaneously with this Ballot.

CLAIMANT CERTIFICATIONS AND SIGNATURE

You **MUST** complete the following section of this Ballot in order for the Ballot to be valid and counted.

By signing this Ballot, the undersigned certifies the following:

- A. I am the holder of a Claim(s) within Class 2 of the Plan (General Unsecured Claims) or am an authorized signatory for such holder having full power and authority to vote and to make or forego the election as set forth herein.
- B. I have been provided with a copy of the Plan, Disclosure Statement and the Confirmation Hearing Notice and acknowledge that the vote set forth on this Ballot is subject to all the terms and conditions set forth in the Plan, Disclosure Statement and Confirmation Hearing Notice; and
- C. I have not submitted any other Ballots relating to this Class of General Unsecured Claims that are inconsistent with the votes as set forth in this Ballot or that, if such other Ballots were previously submitted, they either have been or are hereby revoked or changed to reflect the vote set forth herein.

Creditor:_____

Dated:_____

Signature:_____

Printed Name:_____

Title:_____
(if signing on behalf of the holder of the claim)

Address:_____

Telephone No.:_____

Email
Address:_____

**RETURN THIS BALLOT SO THAT
IT IS RECEIVED ON OR BEFORE
November 17, 2016, by counsel for the
Debtor, at the appropriate address
indicated in the preceding
instructions.**

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: TECHNOLOGY SPECIALISTS, INC., Debtor.	Chapter 11 Case No.: 15-17311 (TJC)
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**NOTICE OF HEARING TO CONSIDER CONFIRMATION
OF AND DEADLINE FOR OBJECTING TO JOINT AMENDED
PLAN OF REORGANIZATION**

On _____, 2016, the United States Bankruptcy Court for the District of Maryland, Greenbelt Division (the “Bankruptcy Court”) approved the Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Joint Amended Plan of Reorganization (the “Disclosure Statement”) for use by the above-captioned debtor and debtor-in-possession (the “Debtor”) in soliciting acceptances or rejections of the Joint Amended Plan of Reorganization (the “Plan”).

In conjunction with approving the Disclosure Statement, the Bankruptcy Court entered an order (i) approving the Disclosure Statement, (ii) approving the dates, procedures and certain forms applicable to the process of soliciting votes on and providing notice of the Plan, (iii) approving certain vote tabulation procedures, (iv) establishing the deadline for filing objections to the Plan; and (v) scheduling the hearing to consider confirmation of the Plan (the “Solicitation Procedures Order”).

**THE DEBTOR AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS RECOMMEND THAT IF YOU ARE ELIGIBLE TO VOTE ON THE
PLAN, YOU VOTE TO ACCEPT THE PLAN.**

If any party wishes to have its Claim allowed for purposes of voting on the Plan in a manner that is inconsistent with the Ballot it received or if any party that did not receive a Ballot wishes to have its Claim temporarily allowed for voting purposes only, such party must serve on the Debtor and file with the Court, on or before **November 3, 2016 at 5:00 p.m. (EST)**, a motion for an order pursuant to Bankruptcy Rule 3018(a) temporarily allowing such Claim for purposes of voting (a “3018 Motion”). A 3018 Motion must set forth with particularity the amount and classification of which such party believes its Claim should be allowed for voting purposes and the evidence to support its belief. If a 3018 Motion is filed, the Court will set a hearing on or before the Voting Deadline to consider the 3018 Motion. In respect of any timely-filed 3018 Motion, the ballot in question shall be counted in the amount established by the Court in an order entered on or before the Voting Deadline.

A hearing to consider confirmation of the Plan will be held on **November 28, 2016 at 11:00a.m. (Eastern Time)**, before the Honorable Thomas J. Catliota, United States Bankruptcy

Judge, United States Bankruptcy Court of the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770. The hearing may be adjourned from time to time by announcement in open court.

Objections (including any accompanying briefs), if any, to confirmation of the Plan or proposed modifications to the Plan must (i) be in writing, (ii) state the name and address of the objecting party and the nature of the claim or interest of such party, (iii) state with particularity the basis and nature of any objection to confirmation of the Plan or proposed modification to the Plan; and (iv) be filed, together with proof of service, so as to be **received no later than 5:00 p.m. (Eastern Time) on November 17, 2016**, by the Office of the Clerk, United States Bankruptcy Court for the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770, and each of the following parties:

Steven L. Goldberg, Esquire
McNamee, Hosea, Jernigan,
Kim, Greenan & Lynch, P.A.
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770

and

G. David Dean, Esquire
Cole Schotz P.C.
300 East Lombard Street, Suite 1450
Baltimore, Maryland 21202

and

Office of the United States Trustee for District of Maryland
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770
Attn: Lynn Kohen, Esquire

Objections not timely filed and served in the manner set forth above shall not be considered and shall be deemed overruled. The Plan may be further modified, if necessary, pursuant to Section 1127 of the United States Bankruptcy Code, prior to, during, or as a result of the confirmation hearing, without further notice to parties in interest. Copies of the Solicitation Procedures Order, the Disclosure Statement, and the Plan may be obtained free of charge (i) by request to Debtor's counsel (a) via e-mail at sgoldberg@mhlawyers.com; or (b) via telephone at (301) 441-2420.

Dated: October __, 2016

**MCNAMEE, HOSEA, JERNIGAN,
KIM, GREENAN & LYNCH, P.A.**

By: /s/

James M. Greenan (Bar No. 08623)
Steven L. Goldberg (Bar No. 28089)
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770
Telephone: (301) 441-2420
Facsimile (301) 982-9450
jgreenan@mhlawyers.com
sgoldberg@mhlawyers.com

*Counsel for Debtor
and Debtor-in-Possession*

EXHIBIT C

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: TECHNOLOGY SPECIALISTS, INC., Debtor.	Chapter 11 Case No.: 15-17311 (TJC)
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**NOTICE OF NON-VOTING STATUS UNDER
JOINT AMENDED PLAN OF REORGANIZATION**

Please take notice that, on _____, 2016, the United States Bankruptcy Court for the District of Maryland, Greenbelt Division (the “Bankruptcy Court”) approved the Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Joint Amended Plan of Reorganization (the “Disclosure Statement”) for use by the above captioned debtor and debtor-in-possession (the “Debtor”) in soliciting acceptances or rejections of the Joint Amended Plan of Reorganization (the “Plan”) from those holders of impaired claims who are (or may be) entitled to receive distributions under the Plan. Capitalized terms used in this Notice which are not defined have the meanings set forth in the Plan.

In conjunction with approving the Disclosure Statement, the Bankruptcy Court entered an order (i) approving the Disclosure Statement; (ii) approving the dates, procedures and certain forms applicable to the process of soliciting votes on and providing notice of the Plan; (iii) approving certain vote tabulation procedures; (iv) establishing the deadline for filing objections to the Plan; and (v) scheduling the hearing to consider confirmation of the Plan (the “Solicitation Procedures Order”).

You are receiving this Notice because you are, or based on your proof of claim may be, the holder of an Administrative Expense Claim, Priority Claim, or non-voting claim in Class 1 (Allowed Secured Tax Claims).

Because of the nature of your claim, and the treatment provided in the Plan for claims of such nature, you are not entitled to vote on the Plan. Nevertheless, you are a party in interest in the Debtor’s Chapter 11 case. You are entitled to participate in the Debtor’s Chapter 11 case, including filing objections to confirmation of the Plan.

PLEASE NOTE THAT YOUR RECEIPT OF THIS NOTICE DOES NOT CONSTITUTE AND SHALL NOT BE DEEMED TO CONSTITUTE AN ADMISSION BY THE PLAN PROPONENTS OF THE NATURE, VALIDITY OR AMOUNT OF YOUR CLAIM. IF YOUR CLAIM HAS NOT BEEN ALLOWED, THE PLAN PROPONENTS RESERVE THE RIGHT TO FILE AN OBJECTION TO THE NATURE, VALIDITY OR AMOUNT OF YOUR CLAIM.

A hearing to consider confirmation of the Plan will be held on **November 28, 2016 at 11:00 a.m. (Eastern Time)**, before the Honorable Thomas J. Catliota, United States Bankruptcy

Judge, United States Bankruptcy Court of the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770. The hearing may be adjourned from time to time by announcement in open court.

Objections (including any accompanying briefs), if any, to confirmation of the Plan or proposed modifications to the Plan must (i) be in writing, (ii) state the name and address of the objecting party and the nature of the claim or interest of such party, (iii) state with particularity the basis and nature of any objection to confirmation of the Plan or proposed modification to the Plan; and (iv) be filed, together with proof of service, so as to be **received no later than 5:00 p.m. (Eastern Time) on November 17, 2016**, by the Office of the Clerk, United States Bankruptcy Court for the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Greenbelt, Maryland 20770 , and each of the following parties:

James M. Greenan, Esquire
Steven L. Goldberg, Esquire
McNamee, Hosea, Jernigan,
Kim, Greenan & Lynch, P.A.
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770

and

Gary H. Leibowitz, Esquire
G. David Dean, Esquire
Cole Schotz P.C.
300 East Lombard Street, Suite 1450
Baltimore, Maryland 21202

and

Office of the United States Trustee for District of Maryland
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770
Attn: Lynn Kohen, Esquire

Objections not timely filed and served in the manner set forth above shall not be considered and shall be deemed overruled. The Plan may be further modified, if necessary, pursuant to Section 1127 of the United States Bankruptcy Code, prior to, during, or as a result of the confirmation hearing, without further notice to parties in interest. Copies of the Solicitation Procedures Order, the Disclosure Statement, and the Plan may be obtained free of charge (i) by request to Debtor's counsel (a) via e-mail at sgoldberg@mhlawyers.com; or (b) via telephone at (301) 441-2420.

Dated: October ___, 2016

**MCNAMEE, HOSEA, JERNIGAN,
KIM, GREENAN & LYNCH, P.A.**

By: /s/

James M. Greenan (Bar No. 08623)
Steven L. Goldberg (Bar No. 28089)
6411 Ivy Lane, Suite 200
Greenbelt, MD 20770
Telephone: (301) 441-2420
Facsimile (301) 982-9450
jgreenan@mhlawyers.com
sgoldberg@mhlawyers.com

*Counsel for Debtor
and Debtor-in-Possession*