

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

In re

SCOTTISH HOLDINGS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 18-10160 (LSS)

Jointly Administered

**NOTICE OF FILING OF (I) AMENDED [PROPOSED] DISCLOSURE  
STATEMENT FOR DEBTORS' FIRST AMENDED JOINT CHAPTER 11  
PLAN; (II) DEBTORS' FIRST AMENDED JOINT CHAPTER 11 PLAN;  
AND (III) REVISED PROPOSED DISCLOSURE STATEMENT ORDER**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On April 18, 2018, the Debtors filed the *Joint Chapter 11 Plan of Reorganization of Scottish Holdings, Inc., and Scottish Annuity & Life Insurance Company (Cayman) Ltd.* (D.I. 213) (the "Plan") and the *[Proposed] Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Scottish Holdings, Inc., and Scottish Annuity & Life Insurance Company (Cayman) Ltd.* (D.I. 214) (the "Disclosure Statement").

2. On May 4, 2018, the Debtors filed *Debtors' Motion for Order: (I) Approving Disclosure Statement; (II) Scheduling Confirmation Hearing and Related Deadlines; (III) Establishing Procedures for Solicitation, Temporary Allowance of Claims and Vote Tabulation; (IV) Approving Form of Ballots; (V) Approving Form, Manner and Sufficiency of Notice of Confirmation Hearing and Related Deadlines; and (VI) Granting Related Relief* (D.I. 242) (the "Solicitation Procedures Motion"), to which was annexed a proposed form of order and

<sup>1</sup> The Debtors, along with the last four digits of their federal tax identification numbers, are as follows: Scottish Holdings, Inc. (4408) and Scottish Annuity & Life Insurance Company (Cayman) Ltd. (3285). The Debtors' mailing address for purposes of these chapter 11 cases is 14120 Ballantyne Corporate Place, Suite 300, Charlotte, NC 28277.

various exhibits thereto including notices and Ballots. (collectively, the “Original Proposed Disclosure Statement Order”).

3. On June 12, 2018, this Court entered the *Order: (I) Approving Debtors’ Designations of (A) Winning Bid and Winning Bidder and (B) Backup Bid and Backup Bidder; and (II) Granting Related Relief* [D.I. 346] (the “Winning Bidder Order”). As contemplated by the Winning Bidder Order, the Debtors have prepared revised version of the Plan, the Disclosure Statement and the Original Proposed Disclosure Statement Order, on terms consistent with the Winning Bid.

4. Attached hereto as **Exhibit A** is the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of Scottish Holdings, Inc., and Scottish Annuity & Life Insurance Company (Cayman) Ltd.* (the “Amended Disclosure Statement”).

5. Attached hereto as **Exhibit B** is the *First Amended Joint Chapter 11 Plan of Reorganization of Scottish Holdings, Inc., and Scottish Annuity & Life Insurance Company (Cayman) Ltd.* (the “Amended Plan”).

6. Attached hereto as **Exhibit C** is the revised Disclosure Statement Order to the Solicitation Procedures Motion (the “Revised Proposed Disclosure Statement Order”).

7. Attached hereto as **Exhibit D** is a redline comparing the Amended Disclosure Statement to the Disclosure Statement.

8. Attached hereto as **Exhibit E** is a redline comparing the Amended Plan to the Plan.

9. Attached hereto as **Exhibit F** is a redline comparing the Revised Proposed Disclosure Statement Order to the Original Proposed Disclosure Statement Order.

10. The hearing to consider approval of the Amended Disclosure Statement and the relief requested in the Solicitation Procedures Motion, as supplemented and modified by the Revised Proposed Disclosure Statement Order, is currently scheduled for **June 28, 2018 at 10:00 a.m. (prevailing Eastern time)** (the “Hearing”) before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801. The Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtors with the Court

11. The Debtors reserve the right to further alter, amend, modify, or supplement the Amended Plan, Amended Disclosure Statement, and Revised Proposed Disclosure Statement Order.

12. Copies of the Amended Plan, Amended Disclosure Statement, and Revised Disclosure Statement Order are or soon will be available and may be examined by interested parties, as follows: (i) free of charge at the web page maintained by the Debtors for restructuring information at <http://www.scottishre.com/chapter11info>; (ii) at the office of the Clerk of the Court, 824 N. Market Street, Wilmington, Delaware 19801 between the hours of 8:00 a.m. and 3:00 p.m. (ET); (iii) on the Court’s electronic docket of these cases at the address <http://www.pacer.gov> (charges may apply); and (iv) free of charge upon reasonable written request to the Debtors’ counsel identified in this notice.

13. If you have any questions regarding this notice, the Amended Disclosure Statement, the Amended Plan, or the Solicitation Procedures Motion as modified and

supplemented by the Revised Proposed Disclosure Statement Order, please contact the undersigned counsel for the Debtors by email at scottishrebankruptcyinfo@mnat.com or by phone at 302-351-9146. The Debtors' counsel cannot provide you with legal advice; you must consult your own attorney for such matters. **DO NOT ATTEMPT TO CONTACT THE COURT FOR ADVICE.**

Dated: June 15, 2018  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Gregory W. Werkheiser

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