## 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

Hearing Date: May 23, 2018 at 10:00 a.m. Objections Due: May 16, 2018 at 4:00 p.m.

## NOTICE OF OBJECTION DEADLINE AND HEARING REGARDING APPROVAL OF DISCLOSURE STATEMENT FOR JOINT CHAPTER 11 PLAN OF REORGANIZATION OF SCOTTISH HOLDINGS, INC., AND SCOTTISH <u>ANNUITY & LIFE INSURANCE COMPANY (CAYMAN) LTD.</u>

#### PLEASE TAKE NOTICE OF THE FOLLOWING:

On April 18, 2018, Scottish Holdings, Inc. and Scottish Annuity & Life Insurance Company (Cayman) Ltd., as debtors and debtors in possession in the above-captioned chapter 11 cases filed (i) the Joint Chapter 11 Plan Of Reorganization Of Scottish Holdings, Inc., And Scottish Annuity & Life Insurance Company (Cayman) Ltd. (as may be amended, modified, or supplemented, the "<u>Plan</u>") and (ii) Disclosure Statement For Joint Chapter 11 Plan Of Reorganization Of Scottish Holdings, Inc., And Scottish Annuity & Life Insurance Company (Cayman) Ltd. (as may be amended, modified, or supplemented, the "<u>Disclosure Statement</u>").

Copies of the Plan and Disclosure Statement are available and may be examined by interested parties (i) free of charge at the web page maintained by the Debtors for restructuring information at <u>http://www.scottishre.com/chapter11info</u>; (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 <u>http://www.pacer.gov</u> (charges may applied); and (iv) free of charge upon reasonable written request to the Debtors' counsel identified in this notice.

Pursuant to Rules 2002(b), 3016 and 3017(a) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), a hearing (the "<u>Hearing</u>") to consider approval of the Disclosure Statement as, among other things, containing "adequate information" within the meaning of section 1125 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") has been scheduled for <u>May 23, 2018 at 10:00 a.m. (prevailing Eastern time)</u> before the Honorable

<sup>&</sup>lt;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.

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 "<u>Bankruptcy Court</u>"). The Disclosure Statement may be amended, modified and/or supplemented prior to the Hearing.

Objections and responses, if any, to approval of the Disclosure Statement, must: (a) be in writing; (b) conform to the Bankruptcy Rules and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "<u>Local Rules</u>"); (c) set forth the name of the objecting party and the nature and amount of Claims or Interests held or asserted by the objecting party against the Debtors' Estates or property; (d) provide the basis for the objection and the specific grounds thereof; and (e) be filed with the Bankruptcy Court and served as set out below.

## The deadline to object or respond to approval of the Disclosure Statement is <u>May</u> <u>16, 2018 at 4:00 p.m. (prevailing Eastern time)</u> (the "<u>Objection Deadline</u>").

Registered users of the Bankruptcy Court's case filing system must electronically file their objections and responses. All other parties in interest must file their objections and responses in writing with the United States Bankruptcy Court Clerk's Office, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 to the attention of the chambers of the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge.

If you file an objection, you must also serve a copy of such objection <u>so as to be</u> <u>actually received</u> by the following parties on or before the Objection Deadline:

# Counsel to the Debtors:

Hogan Lovells US LLP
875 Third Avenue
New York, NY 10022
Facsimile: (212) 918-3100
Attn: Peter Ivanick, Esq.
Lynn W. Holbert, Esq.
John D. Beck, Esq.
Email: peter.ivanick@hoganlovells.com
lynn.holbert@hoganlovells.com
john.beck@hoganlovells.com

# Counsel to the Official Committee:

Pepper Hamilton LLP Hercules Plaza, Suite 5100 1313 Market Street P.O. Box 1709 Wilmington, DE 19899-1709 (Courier Deliveries: 19801-1151) Morris, Nichols, Arsht & Tunnell LLP 1201 N. Market St., 16th Floor P.O. Box 1347 Wilmington, DE 19899-1347 Facsimile: (302) 658-3989 Attn: Eric D. Schwartz, Esq. Gregory W. Werkheiser, Esq. Matthew B. Harvey, Esq. Email: eschwartz@mnat.com gwerkheiser@mnat.com mharvey@mnat.com

# Counsel to the Plan Sponsor:

Sidley Austin LLP 787 Seventh Avenue New York, New York 10019 Facsimile: (212) 839-5599 Attn: Dennis M. Manfredi, Esq. Lee S. Attanasio, Esq. Facsimile: (302) 421-8390 Attn: David M. Fournier, Esq. H. Peter Haveles Jr., Esq. John Henry Schanne II, Esq. Email: fournierd@pepperlaw.com havelesp@pepperlaw.com schannej@pepperlaw.com Email: dmanfredi@sidley.com lattanasio@sidley.com

Upon approval of the Disclosure Statement by the Bankruptcy Court, any party in interest that is entitled to vote on the Plan will receive a paper or an electronic copy of the Disclosure Statement, the Plan and various documents related thereto, except as otherwise ordered by the Bankruptcy Court.

The Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Bankruptcy 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 Bankruptcy Court.

If you have any questions regarding this notice, the Disclosure Statement or the Plan, 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. <u>DO</u> NOT ATTEMPT TO CONTACT THE COURT FOR ADVICE.

Dated: April 18, 2018 Wilmington, Delaware **MORRIS, NICHOLS, ARSHT & TUNNELL LLP** 

/s/ Paige N. Topper Eric D. Schwartz (No. 3134) Gregory W. Werkheiser (No. 3553) Matthew B. Harvey (No. 5186) Paige N. Topper (No. 6470) 1201 N. Market St., 16th Floor PO Box 1347 Wilmington, DE 19899-1347 Telephone: (302) 658-9200 Facsimile: (302) 658-3989 eschwartz@mnat.com gwerkheiser@mnat.com

- and -

Peter Ivanick (admitted *pro hac vice*) Lynn W. Holbert John D. Beck **HOGAN LOVELLS US LLP** 875 Third Avenue New York, NY 10022 Telephone: (212) 918-3000 Facsimile: (212) 918-3100 peter.ivanick@hoganlovells.com lynn.holbert@hoganlovells.com john.beck@hoganlovells.com

Counsel for Debtors and Debtors in Possession