



GRANTED WITH MODIFICATIONS

EFiled: Feb 19 2015 11:10AM EST
Transaction ID: 96168
Case No. Multi-Case



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

MARK JACOBS, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

C.A. No. 10323-VCL

PHILIP A. FALCONE, KEITH M.)
HLADEK, PAUL VOIGT, MICHAEL)
R. HILL, JAMES RUSTIN ROACH, D.)
RONALD YAGODA, PHILLIP O.)
ELBERT, HC2 HOLDINGS, INC., and)
SCHUFF INTERNATIONAL, INC.)

Defendants)

ARLEN DIERCKS, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

C.A. No. 10359-VCL

SCHUFF INTERNATIONAL INC.,)
PHILIP A. FALCONE, KEITH M.)
HLADEK, PAUL VOIGT, MICHAEL)
R. HILL, JAMES RUSTIN ROACH, D.)
RONALD YAGODA, PHILLIP O.)
ELBERT, and HC2 HOLDINGS, INC.,)

Defendants.)

[PROPOSED] ORDER FOR CONSOLIDATION AND APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL, AND LIAISON COUNSEL

WHEREAS, the Court, having reviewed the lead plaintiff and lead counsel applications filed in the above-captioned actions, having heard argument of counsel, and for good cause shown,

IT IS HEREBY ORDERED this ___ day of _____, 2015:

1. The above-captioned actions shall be consolidated for all purposes and are referred to herein as the “Consolidated Action.”

2. Hereafter, papers need only be filed in Civil Action No. 10323-VCL.

3. The consolidated case caption shall be:

SCHUFF INTERNATIONAL, INC.	}	CONSOLIDATED
STOCKHOLDERS LITIGATION		C.A. No. 10323-VCL

4. Plaintiff Mark Jacobs is hereby designated as Lead Plaintiff.

5. The law firm of LEVI & KORSINSKY LLP, 1101 30th Street, N.W., Suite 115, Washington, DC 20007 is hereby designated as Lead Counsel for Plaintiffs.

6. The law firm of RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, DE 19803 is hereby designated as Liaison Counsel for Plaintiffs.

7. All documents previously filed to date in the cases consolidated herein are deemed part of the record in the Consolidated Action. As soon as practicable, plaintiffs may file an amended consolidated complaint.

8. Plaintiffs' Lead Counsel, in consultation with Plaintiffs' Liaison Counsel, shall set policy for plaintiffs for the prosecution of this litigation, delegate and monitor the work performed by plaintiffs' attorneys to ensure that there is no duplication of effort or unnecessary expense, coordinate on behalf of plaintiffs the initiation and conduct of discovery proceedings, provide supervision and coordination of all activities of plaintiffs' counsel, and have the authority to negotiate a settlement, subject to approval of plaintiffs and the Court. Any agreement reached between counsel for defendants and Plaintiffs' Lead Counsel shall be binding on the other plaintiffs.

9. Plaintiffs' Lead Counsel, in consultation with Plaintiffs' Liaison Counsel, shall assume the following powers and responsibilities on behalf of all plaintiffs:

- a. coordinate and direct the preparation of pleadings;
- b. coordinate and direct the briefing and argument of motions;
- c. coordinate and direct the conduct of discovery and other pretrial proceedings;
- d. coordinate and direct class certification proceedings;
- e. coordinate the selection of counsel to act as plaintiffs' spokesperson at pretrial conferences;

- f. call meetings of plaintiffs' counsel as they deem necessary and appropriate from time to time;
- g. conduct any and all settlement negotiations with counsel for the defendants;
- h. coordinate and direct the preparation for trial and trial of this matter, and to delegate work responsibilities to selected counsel as may be required; and
- i. coordinate and direct any other matters concerning the prosecution or resolution of the Consolidated Action.

10. Plaintiffs' Liaison Counsel shall be responsible for coordinating all activities and appearances on behalf of plaintiffs and for the dissemination of notices and Orders of this Court, as well as for communications to and from this Court. No motion, request for discovery, or other pretrial or trial proceedings shall be initiated or filed by any plaintiffs except through Plaintiffs' Liaison Counsel.

11. This Order shall apply to this Consolidated Action and any future-filed actions relating to the subject matter of this case. When a case that properly belongs as part of the Consolidated Action is hereafter filed in this Court, the Court requests the assistance of counsel in calling to the attention of the Court the filing of any case which might properly be consolidated as part of the Consolidated

Action, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

Vice Chancellor

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Multi-Case

File & Serve

Transaction ID: 56497949

Current Date: Feb 19, 2015

Case Number: Multi-Case

Case Name: Multi-Case

Court Authorizer

Comments:

In addition to serving as Delaware Liaison Counsel, Rigrodsky & Long shall serve as Co-Lead Counsel. References in the order to Lead Counsel shall be modified, unless context dictates otherwise, to refer to Co-Lead Counsel.

/s/ Judge Laster, J Travis