

July 18, 2019

VIA E-MAIL & ECF

The Honorable Robert D. Drain
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, NY

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Re: In re Windstream Holdings, Inc., et al. - Case No. 19-22312 (RDD)

Dear Judge Drain:

We write in furtherance of our letter to the Court, dated July 10, 2019, and the Debtors' email response thereto, dated July 11, 2019 concerning a discovery dispute between the parties in the above-captioned proceeding.

Following a meet and confer teleconference held yesterday afternoon, the Debtors and the Trustees' have now reached consensus on a number of outstanding issues including (1) the Debtors will be working with the Trustees, among others, to develop a consensual mediation protocol that we all hope can be presented to the Court at next Friday's hearing, and (2) the Debtors will be producing to the Trustees, on a rolling basis, certain of the documentary materials reviewed by the Debtors in connection with their ongoing investigation of what the Debtors now refer to as "the Uniti Arrangement." Based upon these commitments, the Trustees do not need the Court's intervention at this time with respect to any outstanding discovery. We thank the Court for its patience in awaiting our response.

Sincerely,



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