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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PARETEUM CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 22-10615 (LGB)

Jointly Administered

**Objection Deadline: Extended by agreement to
October 4th at 5:00 p.m.**

**SECURITIES LEAD PLAINTIFF'S RESERVATION OF RIGHTS
REGARDING THE MODIFIED DISCLOSURE STATEMENT
AND CHAPTER 11 PLAN OF LIQUIDATION FOR
PARETEUM CORPORATION AND CERTAIN OF ITS AFFILIATES**

The Pareteum Shareholder Investment Group¹ ("Lead Plaintiff"), the court-appointed lead plaintiff in the securities class action captioned as *In re Pareteum Securities Litigation*, Case No. 1:19-cv-09767 (AKH) (GWG) (the "Securities Litigation") pending in the United States

¹ The Pareteum Shareholder Investment Group is comprised of Kevin Ivkovich, Stephen Jones, Keith Moore, Nicholas Steffey, and Robert E. Whitley, Jr.



District Court for the Southern District of New York,² for itself and the proposed class in the Securities Litigation (the “Proposed Class”), hereby submits this reservation of rights regarding the *Modified Disclosure Statement* [Docket No. 300] and *Chapter 11 Plan of Liquidation for Pareteum Corporation and Certain of its Affiliates (Solicitation Version)* [Docket No. 299] (the “Plan”), and respectfully states as follows:

RESERVATION OF RIGHTS³

1. Lead Plaintiff and the Debtors’ respective counsel have been working towards a resolution of several outstanding confirmation related issues over the past several weeks, including but not limited to issues relating to (i) the Retained Causes of Action; (ii) the Liquidating Trust Assets; and (iii) the Liquidating Trustee’s maintenance of books and records. Lead Plaintiff believes these issues have been resolved through discussions with the Debtors and other parties in interest and is awaiting the opportunity to review the filed versions of the revised Plan, Disclosure Statement, and Plan Supplement prior to the Combined Hearing. Therefore, Lead Plaintiff submits this reservation of rights in an abundance of caution, pending its review of these final, filed documents.

2. As a result, Lead Plaintiff anticipates that it will not be objecting to the Plan, but currently reserves all rights with respect to confirmation of the Plan and related documents, including but not limited to the Plan Supplement (as each may be amended, revised, or supplemented from time to time).

² Citations and references to ECF documents filed in the Securities Litigation will be identified as “SDNY Docket No. --”.

³ Capitalized terms used but not defined herein shall have the meanings given to them in the Plan.

Dated: October 4, 2022

LOWENSTEIN SANDLER LLP

By: /s/ Michael S. Etkin

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