

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

In re

VERENGO, INC.,¹

Debtor.

Chapter 11

Case No.: 16-12098 (BLS)

Related D.I.: 203

Hearing: 3/29/2017 at 11:30 a.m. ET

Obj. Deadline: 3/20/2017 at 4:00 p.m. ET

NOTICE OF MOTION

PLEASE TAKE NOTICE that the above-captioned debtor and debtor in possession (the “**Debtor**”) has filed the *DEBTOR’S MOTION FOR ENTRY OF ORDER (I) APPROVING ON INTERIM BASIS THE COMBINED DISCLOSURE STATEMENT AND PLAN AS CONTAINING ADEQUATE INFORMATION FOR SOLICITATION PURPOSES, (II) SCHEDULING THE COMBINED HEARING AND DEADLINE FOR FILING OBJECTIONS; (III) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE COMBINED DISCLOSURE STATEMENT AND PLAN, AND APPROVING THE FORM OF BALLOT AND SOLICITATION PACKAGE; (IV) ESTABLISHING VOTING RECORD DATE; AND (V) APPROVING THE NOTICE PROVISIONS* (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **March 20, 2017 at 4:00 p.m. (ET)** (the “**Objection Deadline**”). At the same time, you must serve a copy of any objection upon the undersigned counsel to the Debtor so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **MARCH 29, 2017 at 11:30 A.M. (ET)** (THE “**HEARING**”) BEFORE THE HONORABLE BRENDAN L. SHANNON, CHIEF UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM 1, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO OBJECT TO THE MOTION IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.

¹ The Debtor and the last four digits of its identification number are as follows: Verengo, Inc. [6114]. The address of the Debtor’s corporate headquarters is 1899 Western Way, Suite 340, Torrance, CA 90501.

Dated: March 6, 2017
Wilmington, Delaware

BAYARD, P.A.

/s/ Evan T. Miller

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*Attorneys for Debtor
and Debtor-in-Possession*

Copies of the Combined Disclosure Statement and Plan for which the Debtor is seeking conditional approval for adequate information and solicitation purposes at the Hearing, and all pleadings and orders of the Court are publicly available for a fee via PACER at: <http://www.deb.uscourts.gov>, or free of charge from the Voting Agent at: <http://www.jndla.com/cases/verengo>. Such documents and pleadings may also be obtained from the Voting Agent upon request by (i) first-class mail, overnight mail, or hand delivery addressed to: Verengo, Inc. Balloting Center, c/o JND Corporate Restructuring, 8269 E. 23rd Avenue, Suite 275 Denver, CO 80238; or (ii) telephoning the Voting Agent at (855) 839-5147.