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WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Gary T. Holtzer
Sunny Singh

*Attorneys for Debtors
and Debtors in Possession*

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

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In re	:
	:
FUSION CONNECT, INC., et al.,	:
	:
Debtors.¹	:
	:
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Chapter 11
Case No. 19-11811 (SMB)
(Jointly Administered)

**NOTICE OF FILING OF PLAN SUPPLEMENT
IN CONNECTION WITH THE THIRD AMENDED JOINT
CHAPTER 11 PLAN OF FUSION CONNECT, INC. AND ITS SUBSIDIARY DEBTORS.**

PLEASE TAKE NOTICE THAT

1. On June 3, 2019 (the “**Commencement Date**”), Fusion Connect, Inc. and its debtor subsidiaries, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), commenced cases under chapter 11 of title 11 of the United

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Fusion Connect, Inc. (2021); Fusion BCHI Acquisition LLC (7402); Fusion NBS Acquisition Corp. (4332); Fusion LLC (0994); Fusion MPHIC Holding Corporation (3066); Fusion MPHIC Group, Inc. (1529); Fusion Cloud Company LLC (5568); Fusion Cloud Services, LLC (3012); Fusion CB Holdings, Inc. (6526); Fusion Communications, LLC (8337); Fusion Telecom, LLC (0894); Fusion Texas Holdings, Inc. (2636); Fusion Telecom of Kansas, LLC (0075); Fusion Telecom of Oklahoma, LLC (3260); Fusion Telecom of Missouri, LLC (5329); Fusion Telecom of Texas Ltd., L.L.P. (8531); Bircan Holdings, LLC (2819); Fusion Management Services LLC (5597); and Fusion PM Holdings, Inc. (2478). The principal executive office of the Debtors is located at 210 Interstate North Parkway, Suite 300, Atlanta, Georgia 30339.

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States Code in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

2. On October 7, 2019, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Fusion Connect, Inc., and Its Subsidiary Debtors* (ECF No. 455) (the “**Second Amended Plan**”).

3. On October 8, 2019, the Court entered the *Order (I) Approving Disclosure Statement and Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Approving Confirmation Objection Procedures and Notice of Confirmation Hearing, and (V) Granting Related Relief* (ECF No. 457) (the “**Disclosure Statement Order**”).

4. On October 28, 2019, the Debtors filed the *Notice of Filing of Plan Supplement in Connection with the Second Amended Joint Chapter 11 Plan of Fusion Connect, Inc. and Its Subsidiary Debtors* (ECF No. 504) (the “**Initial Plan Supplement**”) containing, among other things, forms of documents and schedules, each of which is integral and part of the Second Amended Plan.

5. On November 8, 2019, the Debtors filed the *Third Amended Joint Chapter 11 Plan of Fusion Connect, Inc., and Its Subsidiary Debtors* (ECF No. 557) (as amended, modified, or supplemented, the “**Third Amended Plan**”).²

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Third Amended Plan.

6. In accordance with the Third Amended Plan and Disclosure Statement Order, the Debtors hereby file this Plan Supplement consisting of the following documents:

Exhibit A-1	Second Amended and Restated Certificate of Incorporation of Fusion Connect, Inc.
Exhibit A-2	Second Amended and Restated Bylaws of Fusion Connect, Inc.
Exhibit B	Stockholders Agreement Term Sheet
Exhibit C-1	Litigation Trust Agreement ³
Exhibit C-2	Redline of Litigation Trust Agreement ⁴

7. The Plan Supplement documents attached hereto remain subject to (a) further review, negotiations, and modifications, and (b) final documentation in a manner consistent with the Third Amended Plan.

8. The Debtors may, in their discretion, update, modify, or supplement the Plan Supplement in accordance with the terms of the Third Amended Plan.

³ On October 28, 2019, the Debtors filed the Initial Plan Supplement, which included the Litigation Trust Agreement annexed as Exhibit D thereto. In consultation with Creditors' Committee and the First Lien Lender Group, the Debtors have since amended the Litigation Trust Agreement.

⁴ Exhibit C-2 of the Plan Supplement contains a redline of the Litigation Trust Agreement against the version filed on October 28, 2019.

9. The Plan Supplement may be viewed and obtained (a) by accessing the Court's website at www.nysb.uscourts.gov, or (b) from the Debtors' claims and noticing agent, Prime Clerk LLC ("**Prime Clerk**"), <https://cases.primeclerk.com/Fusion>. In addition, a copy of the Plan Supplement will be provided on request free of charge by contacting Prime Clerk by calling (844) 230-7218 (domestic toll-free) or +1 (347) 859-8784 (international) or by emailing fusionconnectinfo@primeclerk.com.

Dated: November 15, 2019
New York, New York

/s/ Sunny Singh
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Gary T. Holtzer
Sunny Singh

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