

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

In re:

THE NEWS-GAZETTE, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11901 (KBO)

(Jointly Administered)

**CERTIFICATION OF STRETTO REGARDING TABULATION OF
VOTES IN CONNECTION WITH THE DEBTORS' AMENDED PLAN OF
LIQUIDATION UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

I, Alexa Westmoreland, depose and say under the penalty of perjury:

1. I am a Senior Associate at Stretto, which has offices located at 8269 E. 23rd Avenue, Ste. 275, Denver, CO 80238. I am over the age of eighteen years and neither I nor Stretto is a party to these proceedings. I am duly authorized to submit this certification on behalf of Stretto (the "Certification"). Except as otherwise indicated, all matters set forth herein are based upon my personal knowledge, and, if called as a witness, I could and would testify competently thereto.

2. I submit this Certification in connection with the tabulation of votes to accept or reject the *Debtors' Amended Plan of Liquidation Under Chapter 11 of the Bankruptcy Code* (Docket No. 394) filed in the above-captioned cases (as amended, supplemented, or modified from time to time, the "Plan")².

3. In accordance with the *Order (A) Approving Disclosure Statement; (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Debtors' Plan of Liquidation; (C) Scheduling a Hearing on Confirmation of Debtors' Plan of Liquidation; and (D) Approving Notice Procedures*, dated August 4, 2020 (Docket No. 399) (the "Solicitation Order"), Stretto was appointed and authorized to assist the Debtors with, inter alia, soliciting,

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: The News-Gazette, Inc. (0894) and D.W.S., Inc. (7985). The Debtors' headquarters are located at 15 East Main Street, Champaign, Illinois 61820.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Plan or the Solicitation Order (as defined herein).

receiving, reviewing, determining the validity of, and tabulating Ballots cast on the Plan by holders of Claims in the Voting Classes (as defined below).

4. The Plan designated Claims in Class 2 (General Unsecured Claims) and Class 3 (Pension Claims) (the “Voting Classes”) as Impaired and entitled the Holders of such Claims to vote on the Plan.

5. The Solicitation Order established August 6, 2020 as the record date for determining the Holders of Claims in the Voting Class who would be entitled to vote on the Plan (the “Voting Record Date”).

6. On August 10, 2020, pursuant to and in accordance with the Solicitation Order, Stretto served the Solicitation Packages on holders of Claims entitled to vote on the Plan. An affidavit evidencing Stretto’s service of the foregoing was filed with the Court on August 11, 2020 (Docket No. 407). Solicitation Packages were also forwarded pursuant to USPS forwarding instructions on August 31, 2020 as evidenced by Docket No. 435.

7. Copies of the Plan, and all exhibits were made available via the internet, free of charge at <http://case.stretto.com/news-gazette> on June 25, 2020.

8. Ballots returned by mail, hand delivery, or overnight courier were received by personnel of Stretto at the office of Stretto in Denver, Colorado. All Ballots received by Stretto were date-stamped upon receipt and were processed in accordance with the procedures set forth in the Solicitation Order.

9. For a Ballot to be counted as valid, the Ballot must have been properly completed accordance with the procedures set forth in the Solicitation Order and executed by the relevant Holder, or such Holder’s authorized representative, and must have been received by Stretto by no later than 5:00 p.m. (prevailing Mountain Time) on September 16, 2020 (the “Voting Deadline”).

10. I hereby certify that attached hereto as **Exhibit A** is a detailed voting report of all Ballots submitted to Stretto as of the filing of this Certification.

11. I hereby certify that the results of the voting by Holders of Claims in the Voting Classes are as set forth in **Exhibit B** to this Certification, which is a true and correct copy of the final tabulation of votes, cast by timely and properly completed Ballots received by Stretto.

12. I hereby certify that attached hereto as **Exhibit C** is a detailed voting report of all non-tabulated Ballots submitted to Stretto as of the filing of this Certification.

13. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 16, 2020

/s/ Alexa Westmoreland
Alexa Westmoreland
STRETTO
8269 E. 23rd Avenue
Suite 275
Denver, CO 80238
(855) 295-3672

Exhibit A

*Detailed Voting Report of
All Submitted Ballots*

**Exhibit A**

Detailed Voting Report of All Submitted Ballots
(Sorted by Ballot Number)

Class 2 - General Unsecured Claims

| BALLOT NO. | NAME | DATE FILED | VOTING AMOUNT | ACCEPT OR REJECT? |
|------------|--|------------|---------------|-------------------|
| 1 | JEFF GETZ | 8/20/2020 | \$48.05 | ACCEPT THE PLAN |
| 2 | BRIAN R. HOLDING | 8/20/2020 | \$8.08 | ACCEPT THE PLAN |
| 3 | MARY BANE | 8/20/2020 | \$50.96 | ABSTAIN |
| 4 | SIDNEY BARKER | 8/20/2020 | \$161.10 | ACCEPT THE PLAN |
| 5 | FRED FECHTMANN | 8/21/2020 | \$35.70 | ACCEPT THE PLAN |
| 6 | ELSON'S PAXTON SANITARY SYSTEM | 8/21/2020 | \$31.45 | ACCEPT THE PLAN |
| 7 | LAWRENCE A. FREDRICKSON | 8/21/2020 | \$1,356.94 | ACCEPT THE PLAN |
| 8 | RIGGIE VARNADO | 8/24/2020 | \$87.86 | ACCEPT THE PLAN |
| 9 | MARY FLEMING | 8/24/2020 | \$2,890.12 | ACCEPT THE PLAN |
| 10 | KIRBY'S TIRE | 8/24/2020 | \$495.57 | ACCEPT THE PLAN |
| 11 | TRACI E. NALLY | 8/24/2020 | \$3,540.31 | ACCEPT THE PLAN |
| 12 | NOELLE Y LAGHMAM | 8/25/2020 | \$2,569.49 | ACCEPT THE PLAN |
| 13 | TARTER'S PLANT MAINTENANCE | 8/24/2020 | \$140.00 | ACCEPT THE PLAN |
| 14 | MICHAEL HAILE | 8/26/2020 | \$2,605.52 | ACCEPT THE PLAN |
| 15 | JULIE A. ASMUSSEN | 8/27/2020 | \$2,830.83 | ACCEPT THE PLAN |
| 16 | KERI NUSBAUM | 8/27/2020 | \$35.68 | ACCEPT THE PLAN |
| 17 | ROBERT ASMUSSEN | 8/31/2020 | \$5,323.96 | ACCEPT THE PLAN |
| 18 | RICK G. DANZL | 8/31/2020 | \$1,312.98 | ACCEPT THE PLAN |
| 19 | BRIAN T. BARNHART | 8/31/2020 | \$621.84 | ACCEPT THE PLAN |
| 20 | JEAN NOELLSCH | 8/31/2020 | \$120.00 | ACCEPT THE PLAN |
| 21 | DEBRA L. ERWIN | 8/31/2020 | \$3,092.18 | ACCEPT THE PLAN |
| 22 | TIMOTHY R. MITCHELL | 8/31/2020 | \$2,515.11 | ACCEPT THE PLAN |
| 23 | JAMES S. ROSSOW | 8/31/2020 | \$55,847.64 | ACCEPT THE PLAN |
| 24 | HELEN F. SATTERTHWAITTE | 9/1/2020 | \$15.81 | ACCEPT THE PLAN |
| 25 | JOHN L REED | 9/1/2020 | \$13,884.00 | ACCEPT THE PLAN |
| 26 | PRESTO - X | 9/1/2020 | \$49.00 | ACCEPT THE PLAN |
| 27 | SOUNDEXCHANGE, INC. | 9/4/2020 | \$1,697.12 | ACCEPT THE PLAN |
| 28 | CATHERINE MURRAY | 9/4/2020 | \$17.41 | ACCEPT THE PLAN |
| 29 | AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC. | 9/8/2020 | \$2,210.14 | ACCEPT THE PLAN |
| 31 | STANLEY BURTON | 9/11/2020 | \$801.93 | ACCEPT THE PLAN |
| 32 | DIANA PARSONS | 9/11/2020 | \$90.90 | ACCEPT THE PLAN |
| 33 | EASTERN ILLINI ELECTRIC COOPERATIVE | 9/14/2020 | \$1,032.71 | ACCEPT THE PLAN |
| 34 | PAUL WOOD | 9/14/2020 | \$4,529.27 | ACCEPT THE PLAN |
| 35 | FRANK R. PIEPER | 9/14/2020 | \$2,085.77 | ACCEPT THE PLAN |

Class 3 - Pension Claims

| BALLOT NO. | NAME | DATE FILED | VOTING AMOUNT | ACCEPT OR REJECT? |
|------------|---------------------------------|------------|-----------------|-------------------|
| 30 | GCIU-EMPLOYER RETIREMENT FUND | 9/11/2020 | \$12,116,014.58 | ACCEPT THE PLAN |
| 36 | CWA/ITU NEGOTIATED PENSION PLAN | 9/15/2020 | \$4,932,944.00 | ACCEPT THE PLAN |



Exhibit A

Detailed Voting Report of All Submitted Ballots
(Sorted in Alphabetical Order)

Class 2 - General Unsecured Claims

| BALLOT NO. | NAME | DATE FILED | VOTING AMOUNT | ACCEPT OR REJECT? |
|------------|--|------------|---------------|-------------------|
| 29 | AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC. | 9/8/2020 | \$2,210.14 | ACCEPT THE PLAN |
| 2 | BRIAN R. HOLDING | 8/20/2020 | \$8.08 | ACCEPT THE PLAN |
| 19 | BRIAN T. BARNHART | 8/31/2020 | \$621.84 | ACCEPT THE PLAN |
| 28 | CATHERINE MURRAY | 9/4/2020 | \$17.41 | ACCEPT THE PLAN |
| 21 | DEBRA L. ERWIN | 8/31/2020 | \$3,092.18 | ACCEPT THE PLAN |
| 32 | DIANA PARSONS | 9/11/2020 | \$90.90 | ACCEPT THE PLAN |
| 33 | EASTERN ILLINI ELECTRIC COOPERATIVE | 9/14/2020 | \$1,032.71 | ACCEPT THE PLAN |
| 6 | ELSON'S PAXTON SANITARY SYSTEM | 8/21/2020 | \$31.45 | ACCEPT THE PLAN |
| 35 | FRANK R. PIEPER | 9/14/2020 | \$2,085.77 | ACCEPT THE PLAN |
| 5 | FRED FECHTMANN | 8/21/2020 | \$35.70 | ACCEPT THE PLAN |
| 24 | HELEN F. SATTERTHWAITE | 9/1/2020 | \$15.81 | ACCEPT THE PLAN |
| 23 | JAMES S. ROSSOW | 8/31/2020 | \$55,847.64 | ACCEPT THE PLAN |
| 20 | JEAN NOELLSCH | 8/31/2020 | \$120.00 | ACCEPT THE PLAN |
| 1 | JEFF GETZ | 8/20/2020 | \$48.05 | ACCEPT THE PLAN |
| 25 | JOHN L REED | 9/1/2020 | \$13,884.00 | ACCEPT THE PLAN |
| 15 | JULIE A. ASMUSSEN | 8/27/2020 | \$2,830.83 | ACCEPT THE PLAN |
| 16 | KERI NUSBAUM | 8/27/2020 | \$35.68 | ACCEPT THE PLAN |
| 10 | KIRBY'S TIRE | 8/24/2020 | \$495.57 | ACCEPT THE PLAN |
| 7 | LAWRENCE A. FREDRICKSON | 8/21/2020 | \$1,356.94 | ACCEPT THE PLAN |
| 3 | MARY BANE | 8/20/2020 | \$50.96 | ABSTAIN |
| 9 | MARY FLEMING | 8/24/2020 | \$2,890.12 | ACCEPT THE PLAN |
| 14 | MICHAEL HAILE | 8/26/2020 | \$2,605.52 | ACCEPT THE PLAN |
| 12 | NOELLE Y LAGHMAM | 8/25/2020 | \$2,569.49 | ACCEPT THE PLAN |
| 34 | PAUL WOOD | 9/14/2020 | \$4,529.27 | ACCEPT THE PLAN |
| 26 | PRESTO - X | 9/1/2020 | \$49.00 | ACCEPT THE PLAN |
| 18 | RICK G. DANZL | 8/31/2020 | \$1,312.98 | ACCEPT THE PLAN |
| 8 | RIGGIE VARNADO | 8/24/2020 | \$87.86 | ACCEPT THE PLAN |
| 17 | ROBERT ASMUSSEN | 8/31/2020 | \$5,323.96 | ACCEPT THE PLAN |
| 4 | SIDNEY BARKER | 8/20/2020 | \$161.10 | ACCEPT THE PLAN |
| 27 | SOUNDEXCHANGE, INC. | 9/4/2020 | \$1,697.12 | ACCEPT THE PLAN |
| 31 | STANLEY BURTON | 9/11/2020 | \$801.93 | ACCEPT THE PLAN |
| 13 | TARTER'S PLANT MAINTENANCE | 8/24/2020 | \$140.00 | ACCEPT THE PLAN |
| 22 | TIMOTHY R. MITCHELL | 8/31/2020 | \$2,515.11 | ACCEPT THE PLAN |
| 11 | TRACI E. NALLY | 8/24/2020 | \$3,540.31 | ACCEPT THE PLAN |

Class 3 - Pension Claims

| BALLOT NO. | NAME | DATE FILED | VOTING AMOUNT | ACCEPT OR REJECT? |
|------------|---------------------------------|------------|-----------------|-------------------|
| 36 | CWA/ITU NEGOTIATED PENSION PLAN | 9/15/2020 | \$4,932,944.00 | ACCEPT THE PLAN |
| 30 | GCIU-EMPLOYER RETIREMENT FUND | 9/11/2020 | \$12,116,014.58 | ACCEPT THE PLAN |

Exhibit B
Tabulation Summary

Exhibit B

Tabulation Summary

Class 2 Ballot Results
General Unsecured Claims

| | Count | Dollars |
|---------------------------------|-----------|--------------------|
| Accept: | 31 (100%) | \$94,660.16 (100%) |
| Reject: | 0 (0%) | \$0.00 (0%) |
| Tabulated Ballot Totals: | 31 | \$94,660.16 |
| Abstain: | 1 | \$50.96 |
| Not Tabulated: | 2 | \$17,424.31 |

Class 3 Ballot Results
Pension Claims

| | Count | Dollars |
|---------------------------------|----------|------------------------|
| Accept: | 2 (100%) | \$17,048,958.58 (100%) |
| Reject: | 0 (0%) | \$0.00 (0%) |
| Tabulated Ballot Totals: | 2 | \$17,048,958.58 |
| Abstain: | 0 | \$0.00 |
| Not Tabulated: | 0 | \$0.00 |

Exhibit C
Detailed Report of
Non-Tabulated



Exhibit C

Detailed Report of Non-Tabulated Ballots

| BALLOT NO. | CLASS | NAME | DATE FILED | VOTING AMOUNT | ACCEPT OR REJECT? | REASON |
|------------|---------|----------------|------------|---------------|-------------------|---|
| 3 | Class 2 | MARY BANE | 8/20/2020 | \$50.96 | ABSTAIN | Ballot did not indicate a vote to accept or reject the Plan |
| 11 | Class 2 | TRACI E. NALLY | 8/24/2020 | \$3,540.31 | ACCEPT THE PLAN | Creditor is an Insider |
| 25 | Class 2 | JOHN L REED | 9/1/2020 | \$13,884.00 | ACCEPT THE PLAN | Creditor is an Insider |