

Official Committee of Unsecured Creditors of
Orbital Infrastructure Group, Inc. et al.

October 20, 2023

To: All Unsecured Creditors of Orbital Infrastructure Group and Affiliated Debtors Under Jointly Administered Cases 23-90763 (CML)

The Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) of Orbital Infrastructure Group, Inc. et al. (collectively, the “**Debtors**”) is providing this letter to unsecured creditors to recommend that each unsecured creditor vote to accept the Debtors’ plan of liquidation as set forth in the *Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Orbital Infrastructure Group, Inc., et al.* (as such plan may be amended from time to time, the “**Plan**” or “**Disclosure Statement**” or “**Plan and Disclosure Statement**,” as applicable). As the official representative of all unsecured creditors in the Debtors’ chapter 11 cases, the Creditors’ Committee believes that the Plan is fair and provides unsecured creditors with the best possible recovery under the circumstances of these cases, and recommends that all unsecured creditors vote to accept the Plan in accordance with the instructions set forth on the applicable Ballots.

On August 23, 2023, the Debtors filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. On September 5, 2023, the United States Trustee for the Region 7 appointed the Creditors’ Committee to represent the interests of unsecured creditors in the Debtors’ chapter 11 cases. On September 7, 2023, the Creditors’ Committee selected White & Case LLP as its legal counsel, and on September 8, 2023, the Creditors’ Committee selected AlixPartners, LLP as its financial advisor.

Since its appointment, the Creditors’ Committee has played an active role in the Debtors’ chapter 11 cases in an effort to obtain the best possible recovery under the circumstances for the Debtors’ unsecured creditors. The Plan is the result of the Creditors’ Committee’s efforts, and the Creditors’ Committee believes it is the best possible alternative for unsecured creditors. The Plan implements the global resolution among the Debtors, the Creditors’ Committee, and the DIP Lenders pursuant to which the DIP Lenders agreed to contribute an additional \$3.7 million of cash consideration and release all claims against the Debtors’ estates, including on account of their pre- and post-petition claims. This additional cash consideration will be used under the Plan to establish and fund the Liquidating Trust, which will prosecute Retained Causes of Action for the sole benefit of Holders of General Unsecured Claims, make payment to creditors in accordance with their prepetition priorities, and fund the wind down and dissolution of the Debtors’ estates. The global resolution also allowed the Debtors’ estates to preserve liquidity, which will maximize distributions to creditors under the Plan.

The specific treatment provisions for Holders of General Unsecured Claims are set forth in Article VII of the Plan. The Creditors’ Committee believes that the recoveries to be provided to Holders of General Unsecured Claims under the Plan represent a fair distribution and that the Plan is in the best interests of the Debtors’ creditors. The Creditors’ Committee further believes that any alternative other than confirmation of the Plan could result in extensive delays and increased administrative expenses, which, in turn, would result in smaller distributions on account of unsecured claims asserted against the Debtors. The Creditors’ Committee has approved the releases set forth in the Plan, which preserve claims against current and former directors, officers, managers and employees of the Debtors and their current and former direct and indirect subsidiaries except Front Line and GTS (and their respective current and former direct and indirect subsidiaries) to the extent of insurance proceeds available under D&O Policies.

For the reasons described above, as a representative of all of the Debtors’ unsecured creditors, the Creditors’ Committee supports the Plan and believes that the Plan is in the best interests of the Debtors’ unsecured

creditors as a whole. Accordingly, the Creditors' Committee urges all unsecured creditors to vote to accept the Plan.

PLEASE NOTE THAT THE CREDITORS' COMMITTEE REPRESENTS THE INTERESTS OF UNSECURED CREDITORS AS A WHOLE AND DOES NOT REPRESENT THE INDIVIDUAL INTERESTS OF ANY PARTICULAR UNSECURED CREDITOR. EACH CREDITOR MUST MAKE ITS OWN INDEPENDENT DETERMINATION AS TO WHETHER THE PLAN IS ACCEPTABLE TO THAT CREDITOR AND SHOULD CONSULT WITH ITS OWN LEGAL AND/OR FINANCIAL ADVISOR IN CONNECTION THEREWITH. The foregoing is not intended as a substitute for the Disclosure Statement. All unsecured creditors should read the Plan and Disclosure Statement in its entirety, and then make their own respective independent decisions as to whether the Plan is acceptable. Among other things, the Plan and Disclosure Statement describes in detail: (1) events leading to the Debtors' filing for bankruptcy; (2) events that occurred during the course of the Debtors' chapter 11 cases; (3) the terms of the Plan, including the anticipated distributions that will be made to unsecured creditors; and (4) instructions for voting on the Plan. The Debtors have provided you with a Ballot to vote to accept or reject the Plan. In order to have your vote counted, you must complete and return the Ballot in accordance with the procedures set forth therein and in the accompanying Plan and Disclosure Statement. PLEASE READ THE DIRECTIONS ON THE BALLOT CAREFULLY AND COMPLETE YOUR BALLOT IN ITS ENTIRETY BEFORE RETURNING IT TO THE DEBTORS' SOLICITATION AGENT.

Your timely vote is important, as only those unsecured creditors that timely vote on the Plan will have their vote counted for purposes of determining whether creditors have accepted the Plan. The Creditors' Committee supports approval of the Plan and recommends that you timely vote to accept the Plan in accordance with the procedures established by the Bankruptcy Court. If you have any questions about completing your Ballot, please contact Donlin Recano & Company, Inc., the Debtors' Solicitation Agent, by either calling 1-866-853-1834 (toll-free), +1-212-771-1128 (international), or emailing oiginfo@drc.equiniti.com and referencing "Orbital Infrastructure Group" in the subject line.

Very truly yours,

Attorneys for the Creditors' Committee
White & Case LLP

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