

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

In re:	)	
	)	Chapter 11
US MAGNESIUM LLC,	)	
	)	Case No. 25-11696 (BLS)
Debtor. ¹	)	
	)	
	)	

**DECLARATION OF SELWYN L. PERRY REGARDING THE
TABULATION OF VOTES TO ACCEPT OR REJECT THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS' SECOND AMENDED
COMBINED DISCLOSURE STATEMENT AND PLAN OF LIQUIDATION
OF US MAGNESIUM LLC UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

I, Selwyn L. Perry, pursuant to 28 U.S.C. § 1746, hereby declare under the penalty of perjury as follows:

1. I am a Director of Corporate Restructuring at Stretto, Inc. ("Stretto"), which has offices located at 410 Exchange, Suite 100, Irvine, California 92602. I am over the age of eighteen years old. I do not have a direct interest in the Chapter 11 Case of US Magnesium LLC, as debtor and debtor in possession in the above-captioned chapter 11 case (the "Debtor"). I am duly authorized to submit this declaration (this "Declaration") on behalf of Stretto.

2. I submit this Declaration with respect to the solicitation of votes and the tabulation of Ballots cast on the *Official Committee of Unsecured Creditors' Second Amended Combined Disclosure Statement and Plan of Liquidation of US Magnesium LLC Under Chapter 11 of the Bankruptcy Code* (as may be supplemented, amended, or modified, the "Combined Disclosure Statement and Plan"), which was filed by the Official Committee of Unsecured Creditors (the "Committee" or the "Plan Proponent") contemporaneously herewith.²

¹ The last four digits of the Debtor's federal tax identification number are 5446. The Debtor's service address for the purpose of this chapter 11 case is: 238 N. 2200 W. Salt Lake City, UT 84116.

² Capitalized terms used but not defined herein are defined in the Combined Disclosure Statement and Plan.

3. Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am not being compensated for this testimony other than the compensation that Stretto is receiving as a professional services firm retained by the Debtor pursuant to the Stretto Retention Order. If I were called upon to testify, I could and would testify competently as to the facts set forth herein.

Background

4. The Debtor engaged Stretto as its claims, noticing, and solicitation agent to assist with, among other things, (a) serving solicitation packages to the parties entitled to vote to accept or reject the Combined Disclosure Statement and Plan and (b) tabulating votes cast with respect thereto. Stretto and its employees have considerable experience in soliciting and tabulating votes to accept or reject proposed chapter 11 plans.

5. On May 8, 2026, the Bankruptcy Court entered the *Order (I) Approving the Combined Disclosure Statement and Plan on an Interim Basis for Solicitation Purposes Only; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballot and Solicitation Packages; (IV) Establishing the Voting Record Date; (V) Scheduling a Combined Hearing for Final Approval of the Adequacy of Disclosures In, and Confirmation of, the Combined Disclosure Statement and Plan; (VI) Approving the Forms of Notice; and (VII) Granting Related Relief* [Docket No. 874] (the “Solicitation Procedures Order”), which, among other things, authorized and directed Stretto, Inc. to act as the Voting Agent in connection with the solicitation and tabulation of votes on the Combined Disclosure Statement and Plan.

Service and Transmittal of Solicitation Packages and Tabulation Procedures

6. Pursuant to the Solicitation Procedures Order, Stretto served as the Voting Agent for the solicitation and tabulation process and distributed Solicitation Packages to holders of Claims entitled to vote on the Combined Disclosure Statement and Plan. Additional details regarding the solicitation process are set forth below.

7. Pursuant to the Solicitation Procedures Order and the Combined Disclosure Statement and Plan, Stretto worked with the Committee and its advisors to solicit votes for the Combined Disclosure Statement and Plan and tabulate Ballots submitted by holders of Claims entitled to vote on the Combined Disclosure Statement and Plan. The Committee established May 7, 2026, as the Record Date and June 5, 2026, at 4:00 p.m. (Eastern Time) as the Voting Deadline. Pursuant to the Plan and Solicitation Procedures, Holders of Claims in the following Classes were entitled to vote to accept or reject the Combined Disclosure Statement and Plan:

Class	Description
3	Senior Secured Claims
4	Subordinated Secured Claims
5	Deficiency Claims
6	Insider Unsecured Claims
7	General Unsecured Claims

8. Pursuant to the Plan and Solicitation Procedures, Holders of Claims in the following Classes were not entitled to vote to accept or reject the Combined Disclosure Statement and Plan:

Class	Description
1	Other Priority Claims (Unimpaired)
2	Other Secured Claims (Unimpaired)
8	Existing Equity Interests (Impaired and deemed to reject the Plan)

Solicitation

9. On May 13, 2026, pursuant to the Solicitation Procedures Order, Stretto caused the solicitation packages (the “Solicitation Packages”) to be served on holders of Claims entitled to

vote on the Combined Disclosure Statement and Plan. The Solicitation Packages included, as applicable: (a) the appropriate customized Ballot; (b) instructions for accessing the Combined Disclosure Statement and Plan, the Solicitation Procedures Order, and the Tabulation Procedures; (c) the Notice of Order approving the solicitation procedures and related deadlines; and (d) a postage pre-paid business reply envelope.

10. In accordance with the Solicitation Procedures Order, Stretto served Solicitation Packages on holders of Claims in Class 3 (Senior Secured Claims), Class 4 (Subordinated Secured Claims), Class 5 (Deficiency Claims), Class 6 (Insider Unsecured Claims), and Class 7 (General Unsecured Claims) entitled to vote on the Plan as of the Voting Record Date. Stretto also served Notices of Non-Voting Status on holders of Claims not entitled to vote on the Plan and served the notice of the Solicitation Procedures Order on parties in interest entitled to receive notice in accordance with the Solicitation Procedures Order. Service was effectuated by first-class mail.

11. On May 15, 2026, Stretto completed supplemental service of Solicitation Packages on certain holders of Class 6 (Insider Unsecured Claims) in accordance with the Solicitation Procedures Order. Additional details regarding the service of the Solicitation Packages and related solicitation materials are set forth in an affidavit of service filed with the Court on May 18, 2026 [Docket No. 892].

The Tabulation Process

12. Each Ballot submitted to Stretto was processed and tabulated in accordance with the instructions contained in the applicable Ballot and the Solicitation Procedures. To be included in the tabulation results as valid, a Ballot was required to be (a) properly completed pursuant to the Solicitation Procedures, (b) executed by the Holder entitled to vote on the Plan or such Holder's authorized representative, (c) returned to Stretto by an approved method set forth in the Solicitation

Procedures, and (d) received by Stretto no later than June 5, 2026 at 4:00 p.m. (Eastern Time) (the “Voting Deadline”). Twenty-two hard-copy Ballots were received. With respect to Ballots submitted through Stretto’s online voting portal, encrypted ballot data, date stamps, and audit trails were created upon submission and electronic images of Ballots were created using the submitted ballot data.

13. All Ballots received by Stretto were reviewed and tabulated in accordance with the Solicitation Procedures. Stretto also maintained separate records with respect to Ballots submitted on account of certain Claims that are the subject of pending motions seeking temporary allowance for voting purposes pursuant to Bankruptcy Rule 3018, including the motion filed by The Renco Group, Inc. and Renco Global, LLC [Docket No. 902] and the motion filed by Wells Fargo Bank, National Association [Docket No. 912]. Because no order had been entered with respect to such motions prior to completion of the tabulation process, Ballots submitted on account of such disputed Claims were not included in the official tabulation reflected in **Exhibit A** and are instead reflected separately in **Exhibit C**.

14. I hereby certify that the results of voting by Holders of Claims in the Voting Classes are set forth in **Exhibit A** attached hereto, which is a true and correct copy of the final tabulation of timely and properly completed Ballots received by Stretto. In Class 3, one (1) Holder of a Claim holding Claims in the aggregate amount of \$42,196,536.00 voted to reject the Combined Disclosure Statement and Plan. In Class 5, one (1) Holder of a Claim holding Claims in the aggregate amount of \$1.00 voted to reject the Combined Disclosure Statement and Plan. In Class 6, three (3) Holders of Claims holding Claims in the aggregate amount of \$10,624,736.29 voted to reject the Plan. In Class 7, fifty-five (55) Holders of Claims holding Claims in the aggregate amount of \$87,744,787.34 voted on the Combined Disclosure Statement and Plan, of which fifty-

two (52) Holders holding Claims in the aggregate amount of \$87,744,784.34 voted to accept the Combined Disclosure Statement and Plan and three (3) Holders holding Claims in the aggregate amount of \$3.00 voted to reject the Combined Disclosure Statement and Plan.

15. I hereby certify that attached hereto as **Exhibit B** is a detailed report reflecting all Ballots counted for purposes of determining acceptance or rejection of the Plan. I further certify that attached hereto as **Exhibit C** is a report reflecting Ballots submitted on account of Claims that are the subject of pending Bankruptcy Rule 3018 motions and that were excluded from the official tabulation pending further order of the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: June 11, 2026

/s/ Selwyn L. Perry

Selwyn L. Perry
Director
Stretto, Inc.

Exhibit A

Tabulation Summary

Tabulation of All Ballots as Submitted*

Total Ballots Received						
Voting Class	Voting Class Description	Accepting		Rejecting		Class Voting
		Number	Amount	Number	Amount	Result
Class 3	Senior Secured Claims	0 0.0%	\$0.00 0.0%	1 100.0%	\$42,196,536.00 100.0%	Rejects
Class 4	Subordinated Secured Claims	0 0.0%	\$0.00 0.0%	0 0.0%	\$0.00 0.0%	No Votes Cast
Class 5	Deficiency Claims	0 0.0%	\$0.00 0.0%	1 100.0%	\$1.00 100.0%	Rejects
Class 6	Insider Unsecured Claims	0 0.0%	\$0.00 0.0%	3 100.0%	\$10,624,736.29 100.0%	Rejects
Class 7	General Unsecured Claims	52 94.5%	\$87,744,784 100.0%	3 5.5%	\$3.00 0.0%	Accepts

* Excludes Ballots submitted on account of Claims that are the subject of pending Bankruptcy Rule 3018 motions, including the motion filed by The Renco Group, Inc. and Renco Global, LLC [D.I. 902] and the motion filed by Wells Fargo Bank, National Association [D.I. 912]. Such Ballots are reflected separately in Exhibit C.

Exhibit B

Detailed Report of All Tabulated Ballots

Ballot No.	Class	Name	Attention	Date Filed	Voting Amount	Accept or Reject?
58	Class 3	Wells Fargo Bank, National Association [Wells Fargo Bank, N.A.]	c/o Wells Fargo Capital Finance	06/05/2026	\$42,196,536.00	Reject
60	Class 5	Wells Fargo Bank, N. A.	c/o Burr & Forman LLP	06/05/2026	\$1.00	Reject
41	Class 6	The Renco Group, Inc.	Attn: Joshua Weiss	06/02/2026	\$1.00	Reject
42	Class 6	The Renco Group, Inc.	Attn: Joshua R. Weiss	06/02/2026	\$24,735.29	Reject
43	Class 6	The Renco Group, Inc.	Attn: Joshua Weiss	06/02/2026	\$10,600,000.00	Reject
1	Class 7	Harrison Fire Services LLC	Attn: John Salmon	05/18/2026	\$4,640.00	Accept
2	Class 7	Hose & Rubber Supply Inc	Attn: Thomas Isom; Credit Manager	05/18/2026	\$2,070.83	Accept
3	Class 7	Eye Health Professionals		05/18/2026	\$435.06	Accept
4	Class 7	Tooele Vision Center	Dr. Jed Winder	05/18/2026	\$690.00	Accept
5	Class 7	Water & Energy Systems Technology, Inc.		05/18/2026	\$5,191.55	Accept
6	Class 7	Kaiser Aluminum Warrick, LLC	Attn: John Donnan	05/19/2026	\$68,310,807.77	Accept
7	Class 7	Amalgamated Research LLC	Amalgamated Sugar Company Legal Department	05/19/2026	\$42,420.00	Accept
8	Class 7	Univar Solutions USA LLC	Attn: Kirsten Nitz	05/21/2026	\$1,268,175.27	Accept
9	Class 7	Tetra Tech, Inc.	Attn: Janet Lee	05/21/2026	\$7,726.02	Accept
10	Class 7	Pipe Valve and Fitting Co		05/22/2026	\$45,780.07	Accept
11	Class 7	MRG Industries dba Howe Rental & Sales		05/22/2026	\$12,769.15	Accept
12	Class 7	Lawton Metal Supply		05/22/2026	\$1,122.45	Accept
13	Class 7	Applied Control Equipment LLLP	Attn: Andrea Kewley	05/22/2026	\$4,803.00	Accept

Ballot No.	Class	Name	Attention	Date Filed	Voting Amount	Accept or Reject?
14	Class 7	Ambrose Technical Sales [Atsco Sales & Service]	Attn: Brad Whisenant	05/22/2026	\$2,060.00	Accept
15	Class 7	Rasmussen Equipment Co		05/22/2026	\$17,618.20	Accept
16	Class 7	Ossine Shoes		05/23/2026	\$67,581.89	Accept
17	Class 7	Trinity Industries Leasing Company	c/o Kane Russell Coleman Logan PC	05/26/2026	\$1.00	Accept
18	Class 7	QD Tech, Inc	Attn: Marshall Pardey	05/26/2026	\$71,482.09	Accept
19	Class 7	Current Systems Integration	Attn: Kristee Martell	05/26/2026	\$32,540.34	Accept
20	Class 7	Brody Chemical		05/26/2026	\$5,306.24	Accept
21	Class 7	CRUS Oil Inc.		05/26/2026	\$9,886.81	Accept
22	Class 7	For-Shor Co.		05/26/2026	\$216.58	Accept
23	Class 7	Bowers Industrial Supply		05/26/2026	\$491.64	Accept
24	Class 7	Richard Cowdell		05/26/2026	\$1.00	Accept
25	Class 7	Robert S Gaudin		05/26/2026	\$1.00	Accept
26	Class 7	LGC US Asset Holdings LLC [Lamons]	ATTN: Danialle Reichle	05/27/2026	\$2,822.45	Accept
27	Class 7	Cerium Laboratories	Attn: Belinda Craven & Clayton Fullwood	05/27/2026	\$2,920.00	Accept
28	Class 7	Pure Filtration, LLC		05/27/2026	\$4,372.40	Accept
29	Class 7	Phillips Heavy Equipment Services, LLC		05/27/2026	\$1,534.50	Accept
30	Class 7	Industrial Piping Products Inc		05/28/2026	\$113,556.49	Accept
31	Class 7	Rugged Rental		05/28/2026	\$16,327.92	Accept
32	Class 7	BMC Idaho		05/29/2026	\$50,809.89	Accept
33	Class 7	Intellivex	William (Bill) Carrigan	05/29/2026	\$7,655.39	Accept
34	Class 7	Ameri-Source Specialty Products Inc.		06/01/2026	\$4,081,599.02	Accept
35	Class 7	Gardner Denver Nash LLC [Nash]	Attn: Iva Vyletova	06/01/2026	\$209,769.70	Accept
36	Class 7	Tooele Valley Pumping		06/01/2026	\$12,739.23	Accept
37	Class 7	Eggelhof Inc.		06/01/2026	\$2,566.67	Accept
38	Class 7	Herc Rentals	Attn: Bankruptcy	06/02/2026	\$100,788.00	Accept
39	Class 7	Geneva Hydraulics Inc		06/02/2026	\$37,242.09	Accept

Ballot No.	Class	Name	Attention	Date Filed	Voting Amount	Accept or Reject?
40	Class 7	Mine & Industrial Equip		06/02/2026	\$3,683.57	Accept
44	Class 7	Xylem Dewatering Solutions Inc	c/o NCS Credit	06/03/2026	\$65,440.70	Accept
45	Class 7	CSESCO Inc	Attn: Melanie Cooper	06/03/2026	\$10,877.34	Accept
46	Class 7	Alyssa Leanne Horne, Individually and as Representative of the Estate of Robert John Self	c/o Cain & Skarnulis PLLC	06/03/2026	\$1.00	Reject
47	Class 7	Kaitlyn Summers	c/o Cain & Skarnulis PLLC	06/03/2026	\$1.00	Reject
48	Class 7	Ryan Self	c/o Cain & Skarnulis PLLC	06/03/2026	\$1.00	Reject
49	Class 7	Sefar Inc		06/03/2026	\$1,776.30	Accept
50	Class 7	Wagstaff Crane & Rigging LLC		06/03/2026	\$27,940.00	Accept
51	Class 7	Thal Dixon Enterprises Inc dba Dixon Security Cameras		06/04/2026	\$9,424.15	Accept
52	Class 7	Energy Consortium Industries Inc.	Attn: Steve Jensen	06/04/2026	\$7,525.77	Accept
53	Class 7	Industrial Fluoro-Plastic		06/04/2026	\$149.54	Accept
54	Class 7	Alcoa USA Corp.	c/o Spilman Thomas & Battle, PLLC	06/04/2026	\$8,928,134.02	Accept
55	Class 7	Alcoa Canada Co.	c/o Spilman Thomas & Battle, PLLC	06/04/2026	\$721,066.51	Accept
56	Class 7	Susan Slade		06/04/2026	\$454,129.00	Accept
57	Class 7	Odin Environmental Solutions, LLC	Attn: Jeremy W. Ryan	06/05/2026	\$1,980,592.27	Accept
59	Class 7	Indeck Power Equipment Company		06/05/2026	\$975,523.46	Accept

Exhibit C

Committee Challenge Claims and Bankruptcy Rule 3018 Ballot Report*

Committee Challenge Claims and Bankruptcy Rule 3018 Ballot Report						
Voting Class	Voting Class Description	Accepting		Rejecting		Class Voting
		Number	Amount	Number	Amount	Result
Class 3	Senior Secured Claims	0 0.0%	\$0.00 0.0%	1 100.0%	\$27,175,019.08 100.0%	Rejects
Class 4	Subordinated Secured Claims	0 0.0%	\$0.00 0.0%	2 100.0%	\$46,946,133.45 100.0%	Rejects
Class 5	Deficiency Claims	0 0.0%	\$0.00 0.0%	2 100.0%	\$2.00 100.0%	Rejects
Class 6	Insider Unsecured Claims	0 0.0%	\$0.00 0.0%	1 100.0%	\$75,000,000.00 100.0%	Rejects

*The Ballots reflected herein were submitted on account of Claims that are the subject of pending motions seeking temporary allowance for voting purposes pursuant to Bankruptcy Rule 3018, including the motion filed by The Renco Group, Inc. and Renco Global, LLC (D.I. 902) and the motion filed by Wells Fargo Bank, National Association (D.I. 912). These Ballots were excluded from the official tabulation reflected in Exhibit A.