

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
SAEXPLORATION HOLDINGS, INC., <i>et al.</i> ,	§	Case No. 20-34306 (MI)
	§	
Debtors. <sup>1</sup>	§	(Jointly Administered)
	§	

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**SECOND NOTICE OF STIPULATION REGARDING AD HOC COMMITTEE FOR  
THE NON-CONSENTING TERM LOAN NOTEHOLDERS’  
MOTION TO DESIGNATE VOTES**

Debtors, as debtors and debtors-in-possession (the “**Debtors**”) , the Ad Hoc Committee of Non-Consenting Term Loan Noteholders (the “**Ad Hoc Committee**”), Assured Investment Management LLC (“**Assured**”), Whitebox Advisors, LLC (“**Whitebox**”), and Highbridge Capital Management, LLC (“**Highbridge**,” collectively with Assured and Whitebox, the “**Certain Consenting Creditors**”), hereby file this *Second Notice of Stipulation Regarding Ad Hoc Committee for the Non-Consenting Term Loan Noteholders’ Motion to Designate Votes* (the “**Stipulation**”).

On September 11, 2020, the Court held a hearing on the Debtors’ *Emergency Motion for Entry of an Order (I) Conditionally Approving Disclosure Statement, (II) Approving for Solicitation and Tabulation of Votes to Accept or Reject Plan; (III) Approving Notices; (IV) Approving Rights Offering Procedures; and (IV) Granting Related Relief* (the “**Hearing**”).

The Court set a filing deadline of **October 13, 2020** for the Ad Hoc Committee to file a Motion to Designate the Votes.

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<sup>1</sup> The Debtors in these chapter 11 cases are as follows: SAExploration Holding, Inc. (7100), SAExploration Sub, Inc. (8859), SAExploration, Inc. (9022), SAExploration Seismic Services (US), LLC (5057), and NES, LLC. The address of the Debtors’ headquarters is: 1160 Dairy Ashford Rd., Suite 160, Houston, Texas 77079.

On October 9, 2020, the parties filed the *Notice of Stipulation Regarding Ad Hoc Committee for the Non-Consenting Term Loan Noteholders' Motion to Designate Votes* notifying the Court and parties-in-interest that the parties stipulated to extending the deadline to file a Motion to Designate Votes from October 13, 2020 to October 16, 2020 at 4:00 p.m. CT.

The Debtors, the Certain Consenting Creditors, and the Ad Hoc Committee have continued their good faith discussions, and the parties have agreed to extend the deadline to **October 23, 2020 by 4:00 p.m. CT.**

**IT IS SO STIPULATED:**

October 16, 2020

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*[Additional signatures to follow]*

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