

**HEARING DATE AND TIME: February 2, 2016 at 11:00 a.m. (Eastern Time)**  
**OBJECTION DEADLINE: January 26, 2016 at 4:00 p.m. (Eastern Time)**

Stephen Karotkin  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*

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

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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>SIGA TECHNOLOGIES, INC.,</b>	:	<b>14-12623 (SHL)</b>
	:	
<b>Debtor.</b>	:	
	:	
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**NOTICE OF HEARING ON DEBTOR’S MOTION FOR AN ORDER (I) APPROVING  
NOTICE OF DISCLOSURE STATEMENT HEARING; (II) APPROVING DISCLOSURE  
STATEMENT; (III) ESTABLISHING A RECORD DATE; (IV) ESTABLISHING NOTICE  
AND OBJECTION PROCEDURES FOR CONFIRMATION OF THE PLAN;  
(V) APPROVING SOLICITATION PACKAGES AND PROCEDURES FOR  
DISTRIBUTION THEREOF; (VI) APPROVING THE FORM OF BALLOT AND  
ESTABLISHING PROCEDURES FOR VOTING ON THE PLAN; AND (VII) APPROVING  
THE FORM OF NOTICE TO NON-VOTING CLASSES UNDER THE PLAN**

PLEASE TAKE NOTICE that a hearing on the annexed motion, dated  
January 5, 2016 (the “**Motion**”), of SIGA Technologies, Inc., as debtor and debtor in possession  
(the “**Debtor**”), will be held before the Honorable Sean H. Lane, United States Bankruptcy  
Judge, in Room 701 of the United States Bankruptcy Court for the Southern District of New  
York (the “**Bankruptcy Court**”), One Bowling Green, New York, New York 10004, on  
**February 2, 2016 at 11:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion (the “**Objections**”) must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court’s case filing system, electronically in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>) and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) the attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin); (ii) the Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire); (iii) the attorneys for the statutory creditors’ committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.); and (iv) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.) so as to be received no later than **January 26, 2016 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Debtor may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard.

Dated: New York, New York  
January 5, 2016

/s/ Stephen Karotkin  
Stephen Karotkin

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*

Stephen Karotkin  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
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**UNITED STATES BANKRUPTCY COURT  
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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
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<b>SIGA TECHNOLOGIES, INC.,</b>	:	<b>14-12623 (SHL)</b>
	:	
<b>Debtor.</b>	:	
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**DEBTOR’S MOTION FOR AN ORDER (I) APPROVING NOTICE OF DISCLOSURE STATEMENT HEARING; (II) APPROVING DISCLOSURE STATEMENT; (III) ESTABLISHING A RECORD DATE; (IV) ESTABLISHING NOTICE AND OBJECTION PROCEDURES FOR CONFIRMATION OF THE PLAN; (V) APPROVING SOLICITATION PACKAGES AND PROCEDURES FOR DISTRIBUTION THEREOF; (VI) APPROVING THE FORM OF BALLOT AND ESTABLISHING PROCEDURES FOR VOTING ON THE PLAN; AND (VII) APPROVING THE FORM OF NOTICE TO NON-VOTING CLASSES UNDER THE PLAN**

TO THE HONORABLE SEAN H. LANE,  
UNITED STATES BANKRUPTCY JUDGE:

SIGA Technologies, Inc., (“**SIGA**”), as debtor and debtor in possession (the  
“**Debtor**”), respectfully represents:

**Summary of Relief Requested**

1. On December 15, 2015 the Debtor filed its Chapter 11 Plan (as it may be further amended, modified, and supplemented, the “**Plan**”)<sup>1</sup> (ECF No. 694). On January 5, 2016 the Debtor filed its related Proposed Disclosure Statement for Debtor’s Chapter 11 Plan (as it may be amended, modified, and supplemented, the “**Disclosure Statement**”) (ECF No. 719). In accordance with Rule 3017(a) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Debtor obtained from the Court a date and time for a hearing to consider, inter alia, approval of the Disclosure Statement, which will be held at 11:00 a.m (Eastern Time) on February 2, 2016 (the “**Disclosure Statement Hearing**”).

2. The Plan, which has the support of the Statutory Creditors’ Committee (the “**Committee**”),<sup>2</sup> provides, among other things, a construct for the satisfaction of the claims of the Debtor’s creditors, including PharmAthene’s claim which has been the subject of years of litigation between PharmAthene and the Debtor. Annexed hereto as **Exhibit “A”** is a list of all Classes of Claims and Equity Interests set forth in the Plan.

3. By this Motion and pursuant to sections 105, 502, 1125, 1126, and 1128 of title 11, United States Code (the “**Bankruptcy Code**”), Bankruptcy Rules 2002, 3017, 3018, and 3020, and Rules 3017-1, 3018-1, and 3020-1 of the Local Bankruptcy Rules for the Southern

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

<sup>2</sup> The employment-related agreements attached as exhibits to the Plan, the schedules to be attached to the Plan Covenants, and the documents to be included in the Plan Supplement all remain subject to further discussion between the Debtor and the Committee.

District of New York (the “**Local Rules**”), the Debtor seeks an order (the “**Proposed Order**”): (i) approving the notice of the Disclosure Statement Hearing, substantially in the form annexed hereto as **Exhibit “B,”** (ii) approving the Disclosure Statement under section 1125 of the Bankruptcy Code; (iii) establishing a record date for notice of the Confirmation Hearing (as defined below) and for voting on the Plan; (iv) establishing notice and objection procedures for the Confirmation Hearing, including the form of notice, substantially in the form annexed hereto as **Exhibit “C,”** (v) approving the Notice Packages (as defined below) and procedures for the distribution thereof; (vi) approving the form of ballot, substantially in the form annexed hereto as **Exhibit “D,”** and establishing procedures for voting on the Plan; and (vii) approving the form of notice to non-voting classes, substantially in the forms annexed hereto as **Exhibit “E”** and **Exhibit “F.”**

4. A Proposed Order approving the relief requested in this Motion is annexed hereto as **Exhibit “G.”** The following table provides certain dates and proposed dates related to specific relief requested in the Motion. As demonstrated herein, the proposed procedures are fair and appropriate and should be approved.

<b>Disclosure Statement Objection Deadline:</b>	January 26, 2016 at 4:00 p.m. (Eastern Time)
<b>Disclosure Statement Hearing:</b>	February 2, 2016 at 11:00 a.m. (Eastern Time)
<b>Voting Record Date:</b>	February 2, 2016 for all Claims entitled to vote
<b>Solicitation Deadline:</b>	February. 11, 2016
<b>Voting Deadline:</b>	March 11, 2016 at 4:00 p.m. (Eastern Time)
<b>Publication Deadline:</b>	Not less than 20 days before the Plan Confirmation Objection Deadline
<b>Plan Confirmation Objection Deadline:</b>	March 8, 2016 at 4:00 p.m. (Eastern Time)
<b>Voting Certification Deadline:</b>	March 15, 2016
<b>Deadline to Reply to Plan Objection(s):</b>	March 17, 2016 at 4:00 p.m. (Eastern Time)
<b>Plan Confirmation Hearing:</b>	March 22, 2016

### **Jurisdiction**

5. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

#### **I. APPROVAL OF NOTICE OF DISCLOSURE STATEMENT HEARING AND PROCEDURES FOR FILING OF OBJECTIONS TO THE PROPOSED DISCLOSURE STATEMENT**

##### **A. Approval of Notice of Disclosure Statement Hearing**

6. In accordance with Bankruptcy Rules 3017(a) and 2002 and Local Rule 3017-1, in connection with the filing of this Motion, on or before January 5, 2016, the Debtor will serve a notice of the hearing on this Motion (the “**Disclosure Statement Notice**”), substantially in the form annexed hereto as **Exhibit “B,”** by electronic transmission, by overnight mail, or by first class mail upon all required parties (the “**Notice Parties**”).<sup>3</sup> The

<sup>3</sup> The Notice Parties include: (i) Weil, Gotshal & Manges LLP, the attorneys for the Debtor, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin); (ii) the Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire); (iii) the attorneys for the statutory creditors’ committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.); and (iv) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014

Disclosure Statement Notice provides the Notice Parties with at least 28 days' notice of the Disclosure Statement Hearing and of the deadline by which objections must be filed to approval of the Disclosure Statement. The Debtor requests that the Court approve the Disclosure Statement Notice and the notice given thereby as adequate.

7. The Debtor will provide, at its expense, copies of the proposed Disclosure Statement and Plan to any party in interest upon request made to Prime Clerk LLC ("**Prime Clerk**"), the Debtor's voting agent (the "**Voting Agent**"), at the following address:

**If by standard, overnight, or hand  
delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022  
sigaballots@primeclerk.com

Moreover, copies of the Disclosure Statement and Plan are on file with the Office of the Clerk of the Bankruptcy Court for review during normal business hours (a fee may be charged) and are also available free-of-charge on the Debtor's website at [cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/).

8. The Debtor submits that the foregoing procedures provide adequate notice of the Disclosure Statement Hearing for all purposes and, accordingly, request that the Court approve such procedures as adequate.

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(Attn: Richard C. Morrissey, Esq.), (v) the Securities and Exchange Commission; (vi) all known holders of Claims listed on the Debtor's Schedules (as defined herein) at the addresses stated therein (as amended or supplemented from time to time), other than scheduled Claims that have been superseded by a filed proof of Claim; (vii) all parties who filed proofs of Claim against the Debtor's estate that have not been expunged and disallowed by final order; (viii) all parties who have requested notice pursuant to Bankruptcy Rule 2002; and (ix) the registered and beneficial holders of the Debtor's Existing Common Stock (as defined in the Plan) as of December 29, 2015.



**B. Approval of Procedures for Filing  
Objections to the Disclosure Statement**

9. The Disclosure Statement Notice provides that objections to the proposed Disclosure Statement, if any, must:

- (a) Be in writing;
- (b) State the name and address of the objecting party and the amount and nature of the Claim or Equity Interest of such party;
- (c) State with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be incorporated into the Disclosure Statement to resolve any such objection or response;
- (d) Conform to the Bankruptcy Rules and the Local Rules;
- (e) Be filed with the Bankruptcy Court (i) by registered users of the Bankruptcy Court's case filing system, electronically in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>) and (ii) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable; and
- (f) Be served in accordance with General Order M-399 no later than 4:00 p.m. (Eastern Time), on January 26, 2016 (which is seven days prior to the Disclosure Statement Hearing), on the following parties —
  - (i) The Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire);
  - (ii) The attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq.);
  - (iii) The Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); and
  - (iv) The attorneys for the statutory creditors' committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.).

10. The Debtor requests that the Court approve, pursuant to Bankruptcy Rule 3017, the procedure and timing for filing objections to the proposed Disclosure Statement, as set forth in the Disclosure Statement Notice.

**II. THE DISCLOSURE STATEMENT CONTAINS ADEQUATE INFORMATION AND SHOULD BE APPROVED**

11. Pursuant to section 1125 of the Bankruptcy Code, a plan proponent must provide holders of impaired claims and equity interests with “adequate information” regarding a proposed chapter 11 plan. In that regard, section 1125(a)(1) of the Bankruptcy Code provides:

“[A]dequate information” means information of a kind, and in sufficient detail, as far as is reasonably practicable in light of the nature and history of the debtor and the condition of the debtor’s books and records, including a discussion of the potential material Federal tax consequences of the plan to the debtor, any successor to the debtor, and a hypothetical investor typical of the holders of claims or interests in the case, that would enable such a hypothetical investor of the relevant class to make an informed judgment about the plan . . . .

11 U.S.C. § 1125(a)(1). Thus, a disclosure statement must, as a whole, provide information that is reasonably practicable to permit an informed judgment by impaired creditors or equity interest holders entitled to vote on a plan of reorganization. *See In re Momentum Mfg. Corp.*, 25 F.3d 1132, 1136 (2d Cir. 1994); *Cadle Co. II, Inc. v. PC Liquidation Corp. (In re PC Liquidation Corp.)*, 383 B.R. 856, 866 (E.D.N.Y. 2008) (holding that a disclosure statement was adequate where it “enable[d] a reasonable creditor to make an informed judgment about the [p]lan”); *see also In re Adelpia Commc’ns Corp.*, 352 B.R. 592, 600 (Bankr. S.D.N.Y. 2006) (explaining that “an adequate disclosure determination requires a bankruptcy court to find not just that there is enough information, but also that what is said is not misleading”); *In re Copy Crafters Quickprint, Inc.*, 92 B.R. 973, 979 (Bankr. N.D.N.Y. 1988) (adequacy of disclosure statement “is to be determined on a case-specific basis under a flexible standard that can promote the policy of

Chapter 11 towards fair settlement through a negotiation process between informed interested parties”).

12. In examining the adequacy of the information contained in a disclosure statement, the Court has broad discretion. *See Menard-Sanford v. Mabey (In re A.H. Robins Co., Inc.)*, 880 F.2d 694, 696 (4th Cir. 1989); *Tex. Extrusion Corp. v. Lockheed Corp. (In re Tex. Extrusion Corp.)*, 844 F.2d 1142, 1157 (5th Cir. 1988); *see also In re Oxford Homes, Inc.*, 204 B.R. 264, 269 (Bankr. D. Me. 1997) (Congress intentionally drew vague contours of what constitutes adequate information so that bankruptcy courts may exercise discretion to tailor them to each case’s particular circumstances); *In re Dakota Rail Inc.*, 104 B.R. 138, 143 (Bankr. D. Minn. 1989) (bankruptcy court has “wide discretion to determine . . . whether a disclosure statement contains adequate information, without burdensome, unnecessary, and cumbersome detail”). This grant of discretion was intended to facilitate effective reorganization of a debtor in the broad range of businesses in which chapter 11 debtors engage and the broad range of circumstances that accompany chapter 11 cases. *See* H.R. Rep. No. 595, 95th Cong., 1st Sess. 408–09 (1977). “In reorganization cases, there is frequently great uncertainty. Therefore the need for flexibility is greatest.” *Id.* at 409. Accordingly, the determination of whether a disclosure statement contains adequate information is to be made on a case-by-case basis, focusing on the unique facts and circumstances of each case. *See In re PC Liquidation Corp.*, 383 B.R. at 866; *In re Phoenix Petroleum Co.*, 278 B.R. 385, 393 (Bankr. E.D. Pa. 2001).

13. The Debtor submits that the Disclosure Statement contains adequate information necessary to enable all parties in interest to make an informed judgment with respect to the Plan as required by section 1125 of the Bankruptcy Code, including, but not limited to, a discussion of:

- (a) The circumstances that gave rise to the filing of this chapter 11 case;
- (b) Significant events during the course of this chapter 11 case;
- (c) The condition and performance of the Debtor during this chapter 11 case;
- (d) Information regarding Claims against the Debtor;
- (e) Information regarding Claims and Equity Interests to be addressed under the Plan;
- (f) A summary of the Plan;
- (g) Settlements and compromises of certain Claims under the Plan; and
- (h) Tax consequences of the Plan;

14. The Debtor submits that the Disclosure Statement satisfies the requirements of section 1125 of the Bankruptcy Code and respectfully requests that the Court approve the Disclosure Statement.

### **III. ESTABLISHING A RECORD DATE**

15. Bankruptcy Rule 3017(d) provides that, for the purposes of soliciting votes in connection with the confirmation of a chapter 11 plan, “creditors and interest holders shall include holders of stock, bonds, debentures, notes, and other securities of record on the date the order approving the disclosure statement is entered or another date fixed by the court, for cause, after notice and a hearing.” Fed. R. Bankr. P. 3017(d). Bankruptcy Rule 3018(a) contains a similar provision regarding determination of the record date for voting purposes. Although holders of Equity Interests will not be voting on the Plan because they are deemed to reject the Plan, holders of Equity Interests will be receiving notice of the hearing to consider confirmation of the Plan, the date by which objections must be filed and certain other matters. Accordingly, the Debtor proposes that the record date for purposes of determining (i) which eligible holders of Claims are entitled to vote on the Plan and (ii) which holders of Claims and Equity Interests are

entitled to receive other notices described herein be set on February 2, 2016 (the “**Record Date**”).<sup>4</sup>

**IV. ESTABLISHING NOTICE AND OBJECTION  
PROCEDURES FOR HEARING ON CONFIRMATION OF THE PLAN**

**A. Setting the Confirmation Hearing**

16. Bankruptcy Rule 3017(c) provides:

On or before approval of the disclosure statement, the court shall fix a time within which the holders of claims and interests may accept or reject the plan and may fix a date for the hearing on confirmation.

Fed. R. Bankr. P. 3017(c).

17. In accordance with Bankruptcy Rules 2002(b) and 3017(c) and in view of the Debtor’s proposed solicitation schedule outlined herein, the Debtor requests that a hearing on confirmation of the Plan (the “**Confirmation Hearing**”) be scheduled on March 22, 2016, which is approximately fifty (50) days after the anticipated date for the entry of the Proposed Order. The Confirmation Hearing may be continued from time to time without further notice, except for adjournments announced in open Court or as indicated in any notice of agenda of matters scheduled for hearing filed with the Court. The proposed date for the Confirmation Hearing complies with the Bankruptcy Rules and enables the Debtor to pursue confirmation of the Plan pursuant to an appropriate timetable.

**B. Establishing Procedures for Notice of the Confirmation Hearing**

18. Bankruptcy Rules 2002(b) and (d) require not less than 28 days’ notice of the time fixed for filing objections and the hearing to consider confirmation of a chapter 11 plan. In accordance with Bankruptcy Rules 2002 and 3017(d), the Debtor proposes to provide to all

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<sup>4</sup> With respect to Equity Interest holders or any Claims based on the Debtor’s Existing Common Stock (as defined in the Plan), the list of participants as of the Record Date provided by the Debtor’s registered stock transfer agent will be used to make this determination.

known holders of Claims and Equity Interests, as of the Record Date, simultaneously with the distribution of the Notice Packages (as defined below) to those entities entitled thereto, a notice substantially in the form annexed hereto as **Exhibit “C”** (the “**Confirmation Hearing Notice**”), which provides: (i) the Voting Deadline (as defined below) for the submission of Ballots to accept or reject the Plan; (ii) March 8, 2016 at 4:00 p.m. (Eastern Time) as the time fixed for filing objections to confirmation of the Plan (the “**Plan Confirmation Objection Deadline**”); and (iii) the time, date, and place for the Confirmation Hearing.

19. Bankruptcy Rule 2002(l) permits the Court to “order notice by publication if it finds that notice by mail is impracticable or that it is desirable to supplement the notice.” Fed. R. Bankr. P. 2002(l). In addition to mailing the Confirmation Hearing Notice, the Debtor proposes to publish the Confirmation Hearing Notice, not less than 20 calendar days before the Plan Confirmation Objection Deadline (the “**Publication Deadline**”), once in *The Wall Street Journal* (National Edition). Additionally, the Confirmation Hearing Notice will be available electronically on the Debtor’s website, [cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/). The Debtor believes that publication of the Confirmation Hearing Notice will provide sufficient notice of the time, date, and place of the Confirmation Hearing to persons who do not otherwise receive notice by mail as provided for in the Proposed Order.

20. The Debtor submits that the foregoing procedures will provide adequate notice of the Confirmation Hearing and all related matters and, accordingly, request that the Court deem such notice adequate and proper.

### **C. Establishing Procedures for Objections to the Plan**

21. Pursuant to Bankruptcy Rule 3020(b)(1), objections to confirmation of a plan must be filed and served “within a time fixed by the court.” Fed. R. Bankr. P. 3020(b)(1). Local Rule 3020-1(a) requires that objections to confirmation of a plan be filed no later than

seven days before the Confirmation Hearing. The Confirmation Hearing Notice provides, and the Debtor requests that the Court direct, that any objections to confirmation of the Plan:

- (a) Be in writing;
- (b) State the name and address of the objecting party and the amount and nature of the Claim or Equity Interest of such party;
- (c) State with particularity the basis and nature of any objection;
- (d) Conform to the Bankruptcy Rules and the Local Rules;
- (e) Be filed with the Bankruptcy Court (i) by registered users of the Bankruptcy Court's case filing system, electronically in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>) and (ii) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable; and
- (f) Be served in accordance with General Order M-399 so as to be received no later than 4:00 p.m. (Eastern Time), on March 8, 2016 (which is fourteen days prior to the Confirmation Hearing), on the following parties
  - (i) The Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire);
  - (ii) The attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq.);
  - (iii) The Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); and
  - (iv) The attorneys for the statutory creditors' committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.).

22. The Debtor further requests that the Court set as the deadline for filing and service of replies or an omnibus reply to any objections to confirmation of the Plan, 4:00 p.m. (Eastern Time) on March 17, 2016.

23. The proposed timing for service of objections and replies, if any, will afford the Court, the Debtor, and the Committee sufficient time to consider any objections before the Confirmation Hearing and allow for sufficient time to file any replies, if necessary.

Accordingly, the Debtor requests that the Court approve this schedule pursuant to Bankruptcy Rule 3020 and Local Rule 3020-1(a).

**V. APPROVING SOLICITATION PACKAGES  
AND PROCEDURES FOR DISTRIBUTION**

24. Bankruptcy Rule 3017(d) sets forth the materials that must be provided to holders of Claims and Equity Interests for the purpose of soliciting their votes and providing adequate notice of a hearing on confirmation of a chapter 11 plan:

Upon approval of a disclosure statement, -- except to the extent that the court orders otherwise with respect to one or more unimpaired classes of creditors or equity security holders -- the debtor in possession, trustee, proponent of the plan, or clerk as the court orders shall mail to all creditors and equity security holders, and in a chapter 11 reorganization case shall transmit to the United States trustee,

- (1) the plan or a court-approved summary of the plan;
- (2) the disclosure statement approved by the court;
- (3) notice of the time within which acceptances and rejections of the plan may be filed; and
- (4) any other information as the court may direct, including any court opinion approving the disclosure statement or a court-approved summary of the opinion.

In addition, notice of the time fixed for filing objections and the hearing on confirmation shall be mailed to all creditors and equity security holders in accordance with Rule 2002(b), and a form of ballot conforming to the appropriate Official Form shall be mailed to creditors and equity security holders entitled to vote on the plan.

25. After the Court has approved the Disclosure Statement as containing adequate information as required by section 1125 of the Bankruptcy Code, the Debtor proposes



to mail, or cause to be mailed, the following materials in connection with voting on the Plan and notice of the Confirmation Hearing (the “**Notice Packages**”) and the filing of objections to confirmation of the Plan:

- (a) With respect to holders of Claims in Class 3 (General Unsecured Claims):
  - (i) A copy of the Order granting the relief requested herein (without any exhibits) and approving the Disclosure Statement;
  - (ii) The Confirmation Hearing Notice;
  - (iii) The Disclosure Statement (with the Plan annexed thereto);<sup>5</sup> and
  - (iv) A form of Ballot (as defined below) and appropriate return envelope with prepaid postage.
- (b) With respect to holders of Claims in Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims) that are unimpaired and not entitled to vote on the Plan:
  - (i) The Confirmation Hearing Notice; and
  - (ii) A Notice of Non-Voting Status – Unimpaired Classes (as defined below).
- (c) With respect to holders of Equity Interests in Class 4 (Equity Interests) which Class is deemed to reject the Plan and therefore is not voting on the Plan:
  - (i) A copy of the Order granting the relief requested herein (without any exhibits) and approving the Disclosure Statement;
  - (ii) The Confirmation Hearing Notice;
  - (iii) A Notice of Non-Voting Status – Equity Interests (as defined below); and
  - (iv) The Disclosure Statement (with the Plan annexed thereto).

26. The Debtor also proposes to mail a copy of the Confirmation Hearing Notice (to the extent not already provided in the distributions set forth above) to (i) all Notice

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<sup>5</sup> Copies of the materials contained in the Notice Packages (excluding the Confirmation Hearing Notice and the Ballots) may be provided on CD-ROM at the Debtor’s discretion; *provided, however*, that any party may request to receive paper copies of such materials from Prime Clerk at no cost to such party.

Parties; (ii) all persons or entities that filed proofs of Claim on or before the date of the Disclosure Statement Hearing, except to the extent a Claim was paid pursuant to, or expunged by, prior order of the Court; (iii) all persons or entities listed in the Debtor's schedules of liabilities, dated October 30, 2014 (the "**Schedules**") as holding liquidated, noncontingent, and undisputed claims<sup>6</sup> in an amount greater than \$0.00, other than scheduled Claims that have been superseded by a filed proof of Claim; (iv) the registered and beneficial holders of the Debtor's Existing Common Stock as of the Record Date; (v) all other parties in interest that have filed a request for notice pursuant to Bankruptcy Rule 2002 in these chapter 11 cases; and (vi) any other known holders of Claims against, or Equity Interests in, the Debtor.

27. The Debtor proposes to mail, or cause to be mailed, all of the foregoing distributions no later than seven (7) business days following entry of the Proposed Order (the "**Solicitation Deadline**").

28. Consistent with sections 1126(f) and (g) of the Bankruptcy Code and Bankruptcy Rule 3017(d), Notice Packages for holders of Claims and Equity Interests in the following Classes that are either unimpaired or deemed to reject the Plan will not include a Ballot: Class 1 (Secured Claims), Class 2 (Priority Non-Tax Claims), and Class 4 (Equity Interests).

29. Because Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims) are deemed to have accepted the Plan, in an effort to conserve the resources of the Debtor's estate, the Debtor proposes to send to holders of such Claims a notice of non-voting status, substantially in the form annexed hereto as **Exhibit "E"** ("**Notice of Non-Voting Status –**

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<sup>6</sup> Bankruptcy Rule 3003(c)(2) provides in relevant part that "[a]ny creditor . . . whose claim . . . is not scheduled or scheduled as disputed, contingent, or unliquidated . . . who fails to [timely file a proof of claim] shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution." Fed. R. Bankr. P. 3003(c)(2).

**Unimpaired Classes**”), which sets forth the manner in which a copy of the Plan and Disclosure Statement may be obtained. These Classes will also receive the Confirmation Hearing Notice. The Debtor submits that such notice satisfies the requirements of Bankruptcy Rule 3017(d). The Debtor requests that the Court determine that they are not required to distribute copies of the Plan or Disclosure Statement to any holder of an unimpaired Claim unless otherwise requested in writing on or before 20 days prior to the Confirmation Hearing.

30. The Debtor proposes to send to holders of Equity Interests a notice of non-voting status, substantially in the form annexed hereto as **Exhibit “F” (“Notice of Non-Voting Status – Equity Interests”)**, a copy of the Plan and Disclosure Statement, and the Confirmation Hearing Notice.

31. In addition, to avoid duplication and reduce expenses, the Debtor proposes that creditors who have filed (a) duplicate Claims against the Debtor that are classified under the Plan in the same Class or (b) Claims that amend or supersede previously filed Claims should be required to receive only one Notice Package and the appropriate number of Ballots (if applicable) for voting their Claims with respect to that Class.

32. The Debtor also proposes that notice need not be sent to creditors whose Claims are based solely on amounts scheduled by the Debtor and whose Claims already have been paid in the full scheduled amount; *provided, however*, if, and to the extent that, any such creditor would be entitled to receive notice for any reason other than by virtue of the fact that the Claim had been scheduled by the Debtor, such creditor will be sent notice in accordance with the procedures set forth above.

33. The Debtor anticipates that some notices may be returned by the United States Postal Service as undeliverable. The Debtor believes that it would be costly and wasteful

to mail such notices to the same addresses to which previous notices have been returned as undeliverable. Therefore, the Debtor seeks the Court's approval for a departure from the strict notice rule, excusing the Debtor from mailing such notices to those entities listed at such addresses unless the Debtor is provided with accurate addresses for such entities prior to 20 days before the Confirmation Hearing.

34. The Debtor submits that they have shown good cause for implementing the proposed notice and service procedures, and request that the Court approve such notice as adequate.

**VI. APPROVING FORM OF BALLOT AND ESTABLISHING PROCEDURES FOR VOTING ON THE PLAN**

**A. Approval of Form of Ballot and Distribution Thereof**

35. Bankruptcy Rule 3017(d) requires the Debtor to mail a form of ballot, which substantially conforms to Official Form No. 14, only to "creditors and interest holders entitled to vote on the plan." Fed. R. Bankr. P. 3017(d). The Debtor intends to distribute ballots to holders of Claims in Class 3 (General Unsecured Claims), under the Plan, which is the only Class entitled to vote to accept or reject the Plan. The form of Ballot is substantially in the form annexed hereto as **Exhibit "D"** (the "**Ballot**") and is based on Official Form No. 14, but has been modified to address the particular aspects of these chapter 11 cases and to include certain additional information relevant and appropriate for Class 3 (General Unsecured Claims).

**B. Establishing a Voting Deadline for Receipt of Ballots**

36. Bankruptcy Rule 3017(c) provides that, on or before approval of a disclosure statement, the Court shall fix a time within which the holders of claims or equity interests may accept or reject a plan. Fed. R. Bankr. P. 3017(c). As stated, the Debtor anticipates commencing the solicitation of votes to accept or reject the Plan by the Solicitation

Deadline. Based on such schedule, the Debtor proposes that, to be counted as a vote to accept or reject the Plan, each Ballot must be properly executed, completed, and delivered to the Voting Agent, by (i) first-class mail, in the return envelope provided; (ii) electronic, online submission at Prime Clerk's website (as described more fully below); (iii) overnight courier; or (iv) personal delivery so that it is received by the Voting Agent no later than the Voting Deadline, which shall be March 11, 2016 (the "**Voting Deadline**"). This solicitation period should be a sufficient period within which parties entitled to vote can make an informed decision to accept or reject the Plan.

37. As mentioned above, in addition to accepting Ballots by regular mail, overnight courier or hand delivery, the Debtor seeks authority to accept Ballots via electronic, online transmission through a customized electronic Ballot by utilizing the E-Ballot platform on Prime Clerk's website. Holders may cast an E-Ballot and electronically sign and submit such electronic Ballot via the E-Ballot platform. Instructions for casting an electronic Ballot can be found on the "E-Ballot" section of Prime Clerk's website. The encrypted ballot data and audit trail created by such electronic submission shall become part of the record of any electronic Ballot submitted in this manner and the creditor's electronic signature will be deemed to be an original signature that is legally valid and effective. For the avoidance of doubt, holders may only cast Ballots electronically via the E-Ballot platform. Ballots submitted by electronic mail, facsimile or any other means of electronic submission not specifically authorized by the solicitation procedures shall not be counted.

**C. Approval of Procedures for Vote Tabulation**

38. Section 1126(c) of the Bankruptcy Code provides:

A class of claims has accepted a plan if such plan has been accepted by creditors, other than any entity designated under subsection (e) of this section, that hold at least two-thirds in

amount and more than one-half in number of the allowed claims of such class held by creditors, other than any entity designated under subsection (e) of this section, that have accepted or rejected such plan.

11 U.S.C. § 1126(c).

39. Further, Bankruptcy Rule 3018(a) provides that the “court after notice and hearing may temporarily allow the claim or interest in an amount which the court deems proper for the purpose of accepting or rejecting a plan.” Fed. R. Bankr. P. 3018(a).

*i* ***Ballot Tabulation***

40. Solely for purposes of voting to accept or reject the Plan and not for the purpose of the allowance of, or distribution on account of a Claim, and without prejudice to the rights of the Debtor or the applicable creditor in any other context, the Debtor proposes that each Claim within Class 3 (the only Class entitled to vote to accept or reject the Plan) be temporarily allowed in an amount equal to the amount of such Claim as set forth in a timely filed proof of Claim, or, if no proof of Claim was filed, the amount of such Claim as set forth in the Schedules.

The foregoing general procedure will be subject to the following exceptions:

- (a) If a Claim is deemed Allowed (as defined in the Plan), pursuant to the Plan, such Claim shall be Allowed for voting purposes in the deemed Allowed amount set forth in the Plan;
- (b) If a Claim, for which a proof of Claim has been timely filed, is wholly contingent, unliquidated, or disputed, such Claim shall be allowed for voting purposes only, and not for purposes of allowance or distribution, at \$1.00, unless such Claim is disputed in the manner set forth in subparagraph 40(f) below;
- (c) If a Claim, for which a proof of Claim was timely filed, lists an amount that is liquidated and noncontingent, such Claim shall be temporarily allowed in the amount set forth on the proof of Claim, unless such claim is disputed in the manner set forth in subparagraph 40(f) below;
- (d) If a Claim, for which a proof of Claim was timely filed, lists an amount that is partially liquidated and partially unliquidated, such Claim shall be temporarily allowed only in the liquidated amount set forth on the proof of

Claim, unless such claim is disputed in the manner set forth in subparagraph 40(f) below;

- (e) If a Claim has been estimated for voting purposes or otherwise allowed for voting purposes by order of the Court, such Claim shall be allowed in the amount so estimated or allowed by the Court for voting purposes only, and not for purposes of allowance or distribution, unless otherwise provided by order of the Court;
- (f) If a Claim is listed in the Schedules as contingent, unliquidated, disputed, in the amount of \$0.00, or unknown, and a proof of Claim was not (i) filed by the applicable bar date for the filing of proofs of Claim established by the Court or (ii) deemed timely filed by an order of the Court prior to the Voting Deadline, unless the Debtor has consented in writing, such Claim shall be disallowed for voting purposes;
- (g) If the Debtor serves an objection to, or request for estimation of, a Claim at least 20 days before the Voting Deadline, such Claim shall be temporarily disallowed for voting purposes only and not for purposes of allowance or distribution, except to the extent and in the manner as may be set forth in the objection or request for estimation;
- (h) If the Debtor serves an objection to a Claim at least 20 days before the Voting Deadline, and the relief sought in that objection is to supersede one or more scheduled Claims with a filed Claim, such scheduled Claim shall be temporarily disallowed for voting purposes only and not for purpose of allowance or distribution; *provided, however*, that in the event the holder of such Claims has returned only the Ballot in connection with the scheduled Claim(s), such Ballot shall be counted in the amount of the filed Claim;
- (i) For purposes of voting, classification, and treatment under the Plan, each party that holds or has filed more than one Claim in a particular class shall be treated as if such entity has only one Claim, the Claims filed by such entity shall be aggregated, and the total dollar amount of such Claims shall be the sum of the aggregated Claims of such entity;
- (j) Notwithstanding anything contained herein to the contrary, the Voting Agent, in its discretion, may contact entities entitled to vote to cure any defects in the Ballots and is authorized to so cure any defects;
- (k) There shall be a rebuttable presumption that in the case where more than one timely, properly completed Ballot is received, only the latest received, properly completed Ballot will be counted unless the holder of the Claim receives Court approval to have the Ballot that was received earlier be counted;

- (l) If a Claim is filed in the amount of \$0.00, the holder of such Claim shall not be entitled to vote on account of such Claim;
- (m) If a Claim is filed in a currency other than U.S. Dollars and is not Allowed in a sum certain pursuant to the Plan, the holder of such Claim shall be entitled to vote a Claim in the amount of \$1.00; and
- (n) Notwithstanding anything contained herein to the contrary, the PharmAthene Claim (as defined in the Plan) shall be deemed allowed for voting purposes only in the amount of \$205 million (the foregoing shall be without prejudice to the actual amount of the PharmAthene Allowed Claim as determined pursuant to the PharmAthene Final Order).

41. The Debtor believes that the foregoing proposed procedures provide for a fair and equitable voting process. If any party seeks to challenge the allowance of a Claim for voting purposes in accordance with the above procedures, the Debtor requests that the Court direct such creditor to serve on the Debtor and file with the Court (with a copy to Chambers) a motion for an order pursuant to Bankruptcy Rule 3018(a) temporarily allowing such Claim in a different amount for purposes of voting to accept or reject the Plan on or before the tenth day after the later of (i) service of the Confirmation Hearing Notice and (ii) service of notice of an objection or request for estimation of such Claim, if any. The Debtor further proposes, in accordance with Bankruptcy Rule 3018, that as to any creditor filing such a motion, such creditor's Ballot should not be counted unless allowed by the Court for voting purposes, after notice and a hearing, pursuant to an order entered at least six (6) days prior to the Voting Deadline or as otherwise directed by the Court.

42. The Debtor also requests that creditors must vote all of their Claim(s) within Class 3 (General Unsecured Claims) under the Plan either to accept or reject the Plan and may not split their vote(s), and a Ballot that partially rejects and partially accepts the Plan will not be counted.



43. The Debtor further proposes that, for holders of Claims subject to the Record Date, no transfer of Claim(s) pursuant to Bankruptcy Rule 3001 shall be recognized unless (i) documentation evidencing such transfer was filed with the Court on or before 22 days prior to the Record Date, (ii) the transfer is not defective, and (iii) no timely objection with respect to such transfer was filed by the transferor. In instances where a Claim has been the subject of one or more partial transfers, each holder of a portion of said Claim shall be deemed to hold one Claim for numerosity purposes.

44. The Debtor further proposes that the following Ballots not be counted or considered for any purpose in determining whether the Plan has been accepted or rejected: (i) any Ballot received after the Voting Deadline unless the Debtor shall have granted in writing an extension of the Voting Deadline with respect to such Ballot; (ii) any Ballot that is illegible or contains insufficient information to permit the identification of the Claim holder; (iii) any Ballot cast by a person or entity that does not hold a Claim in a Class that is entitled to vote to accept or reject the Plan; (iv) any Ballot that is unsigned or without an original signature; and (v) any Ballot transmitted to the Voting Agent by facsimile, electronic transmission, or other electronic means not specifically authorized herein. Ballots that are properly completed, executed, and timely returned to the Voting Agent, but do not indicate an acceptance or rejection of the Plan, partially accept and partially reject the Plan, or indicate both an acceptance and rejection of the Plan, will not be counted.

*ii* ***Vote Certification***

45. In accordance with Local Rule 3018-1(a), at least seven days prior to the Confirmation Hearing, the Voting Agent shall certify in writing (the “**Voting Certification**”) the amount and number of Allowed Claims in Class 3 (General Unsecured Claims) that vote to accept or reject the Plan, and shall serve the Voting Certification upon, among others, (i) the

Court; (ii) the attorneys for the Debtor; (iii) the U.S. Trustee; and (iv) the attorneys for the Committee.

46. The Debtor submits that such procedures provide for a fair and equitable voting process and should be approved by the Court.

**Notice**

47. Notice of this Motion has been provided to the Notice Parties by providing them with a copy of the Disclosure Statement Notice. A copy of this Motion has been provided to parties in interest in accordance with the Order Pursuant to 11 U.S.C. §§ 105(a) and (d) and Bankruptcy Rules 2002(m) and 9007 Implementing Certain Notice and Case Management Procedures (ECF No. 138). The Debtor submits that such notice is sufficient and no other or further notice need be provided.

48. No previous request for the relief sought herein has been made by the Debtor to this or any other Court.

WHEREFORE the Debtor respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
January 5, 2016

/s/ Stephen Karotkin  
Stephen Karotkin

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*

**Exhibit A**

**List of Classes of Claims and Equity Interests**

The following table designates the Classes of Claims against and Equity Interests in the Debtor and specifies which of those Classes are (i) impaired or unimpaired by the Plan, (ii) entitled to vote to accept or reject the Plan in accordance with section 1126 of the Bankruptcy Code, and (iii) deemed to accept or reject the Plan:

<b><u>Class</u></b>	<b><u>Designation</u></b>	<b><u>Impairment</u></b>	<b><u>Entitled to Vote</u></b>
Class 1	Secured Claims	Unimpaired	No (deemed to accept)
Class 2	Priority Non-Tax Claims	Unimpaired	No (deemed to accept)
Class 3	General Unsecured Claims	Impaired	Yes
Class 4	Equity Interests	Impaired	No (deemed to reject)

**Exhibit B**

**Disclosure Statement Notice**

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

-----X		
	:	
<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>SIGA TECHNOLOGIES, INC.,</b>	:	<b>14-12623 (SHL)</b>
	:	
<b>Debtor.</b>	:	
	:	
-----X		

**NOTICE OF HEARING TO CONSIDER APPROVAL OF DEBTOR’S PROPOSED  
DISCLOSURE STATEMENT FOR DEBTOR’S CHAPTER 11 PLAN**

**TO PARTIES IN INTEREST IN SIGA TECHNOLOGIES, INC. CHAPTER 11 CASE:**

**PLEASE TAKE NOTICE** that on December 15, 2015, SIGA Technologies, Inc. (the “**Debtor**”), filed the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”) (ECF No. 694). On January 5, 2016, the Debtor filed its proposed Disclosure Statement for the Debtor’s Chapter 11 Plan (as it may be amended, the “**Disclosure Statement**”), pursuant to section 1125 of title 11 of the United States Code (the “**Bankruptcy Code**”).

**PLEASE TAKE FURTHER NOTICE** that:

1. A hearing (the “**Hearing**”) will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, **on February 2, 2016 at 11:00 a.m. (Eastern Time)** in Room 701 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), One Bowling Green, New York, New York 10004, or as soon thereafter as counsel can be heard, to consider the entry of an order, among other things, finding that the Disclosure Statement contains “adequate information” within the meaning of section 1125 of the Bankruptcy Code and approving the Disclosure Statement.

2. The Disclosure Statement and the Plan are on file with the Clerk of the Bankruptcy Court (the “**Clerk**”) and may be examined by interested parties on the Bankruptcy Court’s electronic docket for the Debtor’s chapter 11 case, which can be found at [cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/) and <http://nysb.uscourts.gov> (a PACER login and password are required to access documents on the Court’s website and can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)).

3. Copies of the Disclosure Statement and the Plan may also be examined by interested parties during normal business hours at the office of the Clerk. Copies of the Disclosure Statement and Plan may also be obtained by written request to the Debtor’s voting agent, Prime Clerk LLC (“**Prime Clerk**”), at the address set forth below:

**If by standard, overnight, or hand delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3th Floor  
New York, New York 10022  
sigaballots@primeclerk.com

**PRIME CLERK IS NOT AUTHORIZED TO, AND WILL NOT PROVIDE, LEGAL ADVICE.**

4. Responses and objections, if any, to the approval of the Disclosure Statement or any of the other relief sought by the Debtor in connection with approval of the Disclosure Statement must (i) be in writing, (ii) state the name and address of the objecting or responding party and the amount and nature of the claim or equity interest of such party, (iii) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be incorporated into the Disclosure Statement to resolve any such objection or response, (iv) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, (v) be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and (vi) served in accordance with General Order M-399 so as to be actually received **on or before 4:00 p.m. (Eastern Time) on January 26, 2016** on the following parties (a) the Clerk, One Bowling Green, New York, New York 10004; (b) the attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin); (c) the Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire.); (d) the attorneys for the statutory creditors' committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.); and (e) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.).

**5. IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.**

6. Upon approval of the Disclosure Statement by the Bankruptcy Court, holders of claims against the Debtor who are entitled to vote on the Plan will receive a copy of the Disclosure Statement, the Plan, and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

7. The Hearing may be adjourned from time to time without further notice to creditors, equity interest holders, or parties in interest other than by an announcement in Bankruptcy Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Bankruptcy Court.

Dated: New York, New York  
January 5, 2016

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*

**Exhibit C**

**Confirmation Hearing Notice**



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

-----X  
 :  
**In re** : **Chapter 11 Case No.**  
 :  
**SIGA TECHNOLOGIES, INC.,** : **14-12623 (SHL)**  
 :  
**Debtor.** :  
 :  
 -----X

**NOTICE OF (I) APPROVAL OF DISCLOSURE STATEMENT;  
(II) ESTABLISHMENT OF RECORD DATE; (III) HEARING ON CONFIRMATION  
OF THE PLAN AND PROCEDURES FOR OBJECTING TO CONFIRMATION  
OF THE PLAN; AND (IV) PROCEDURES AND DEADLINE FOR VOTING ON THE PLAN**

**TO PARTIES IN INTEREST IN SIGA TECHNOLOGIES, INC. CHAPTER 11 CASE:**

**PLEASE TAKE NOTICE that:**

1. **Approval of Disclosure Statement.** By Order dated [\_\_\_\_], 2016 (ECF No.[ ]) (the “**Order**”), the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) approved the Disclosure Statement for the Debtor’s Chapter 11 Plan (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc. (the “**Debtor**”). The Bankruptcy Court also authorized the Debtor to solicit votes from those parties entitled to vote with regard to the acceptance or rejection of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”), annexed as **Exhibit “A”** to the Disclosure Statement. Any capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

2. **Confirmation Hearing.** A hearing (the “**Confirmation Hearing**”) to consider the confirmation of the Plan will be held at [\_:\_.m.] (**Eastern Time**) on [\_\_\_\_], **2016**, before the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004. The Confirmation Hearing may be continued from time to time without further notice other than the announcement by the Debtor of the adjourned date(s) at the Confirmation Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Bankruptcy Court, and the Plan may be modified, if necessary, prior to, during, or as a result of the Confirmation Hearing, without further notice to interested parties.

3. **Record Date for Voting.** Only parties who are eligible to vote and hold Claims against the Debtor as of February 2, 2016 are entitled to vote on the Plan.

4. **Voting Deadline.** All votes to accept or reject the Plan must be actually received by the Debtor’s voting agent, Prime Clerk LLC (“**Prime Clerk**”), by no later than 4:00 p.m. on [\_\_\_\_], 2016 (the “**Voting Deadline**”). Any failure to follow the voting instructions included with your ballot may disqualify your ballot and your vote.

5. **Parties in Interest Not Entitled to Vote.** The following holders of Claims and Equity Interests are not entitled to vote on the Plan: (i) holders of unimpaired Claims, (ii) holders of

Equity Interests, or (iii) holders of Claims that are the subject of filed objections or requests for estimation. If you have timely filed a proof of Claim and disagree with the Debtor's classification of, objection to, or request for estimation of, your Claim and believe that you should be entitled to vote on the Plan, then you must serve on the Debtor at the address set forth below and file with the Bankruptcy Court (with a copy to chambers) a motion (a "**Rule 3018(a) Motion**") for an order pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") temporarily allowing such claim in a different amount or in a different class for purposes of voting to accept or reject the Plan.

6. All Rule 3018(a) Motions must be filed on or before the tenth (10th) day after the later of (i) service of this notice and (ii) service of notice of an objection or request for estimation, if any, as to such Claim. In accordance with Bankruptcy Rule 3018, as to any creditor filing a Rule 3018(a) Motion, such creditor's ballot will not be counted except as may be otherwise ordered by the Bankruptcy Court at least six (6) days prior to the Voting Deadline or as the Bankruptcy Court may direct. Creditors may contact Prime Clerk by calling (844) 276-3030 (domestic) or (917) 962-8891 (international) or emailing sigaballots@primeclerk.com to receive an appropriate ballot for any Claim for which a proof of Claim has been timely filed and a Rule 3018(a) Motion has been granted. Rule 3018(a) Motions that are not timely filed and served in the manner set forth above shall not be considered.

7. **Objections to Confirmation.** Responses and objections, if any, to confirmation of the Plan must:

- (a) Be in writing;
- (b) State the name and address of the objecting party and the amount and nature of the Claim or Equity Interest of such party;
- (c) Conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court;
- (d) State with particularity the basis and nature of any objection to confirmation of the Plan;
- (e) Be filed with the Bankruptcy Court either (i) *electronically* or (ii) *conventionally*, as noted below:
  - (i) *Electronic Filing*: the filer must be an attorney in possession of passwords and logins to both PACER and the Bankruptcy Court's Electronic Case Filing System; electronic filing must be in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>); or
  - (ii) *Conventional Filing*: the filer must send the response or objection by mail, courier, or messenger to the Bankruptcy Court's clerk at the following address: United States Bankruptcy Court, One Bowling Green, New York, NY 10004; the hard copy of the response or objection should be accompanied by a CD-ROM containing the response or objection in text-searchable portable document format (PDF);

[NOTE: *All filers* – those filing electronically as well as those filing conventionally – must provide Bankruptcy Court Chambers with a separate hard copy of the response or objection; any proposed order should be accompanied by a CD-ROM containing the response or objection in text-searchable portable document format (PDF)]; and

- (f) Be served in accordance with General Order M-399 so as to be received no later than [\_\_\_\_\_], 2016 at 4:00 p.m. (Eastern Time), and on the following parties:
- (i) The Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire);
  - (ii) The attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq.);
  - (iii) The Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); and
  - (iv) The attorneys for the statutory creditors' committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.).

**IF ANY OBJECTION OR RESPONSE TO CONFIRMATION OF THE PLAN IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO CONFIRMATION OF THE PLAN AND MAY NOT BE HEARD AT THE HEARING. REPLIES TO ANY SUCH OBJECTIONS AND RESPONSES MUST BE FILED AND SERVED BY NO LATER THAN [\_\_\_\_\_], 2016 AT 12:00 NOON (EASTERN TIME).**

8. **Parties Who Will Not Be Treated as Creditors.** Any holder of a Claim that (i) is scheduled in the Debtor's schedules of assets and liabilities at \$0.00, or in an unknown amount, or as disputed, contingent, or unliquidated, and is not the subject of a timely filed proof of Claim or a proof of Claim deemed timely filed with the Bankruptcy Court pursuant to either the Bankruptcy Code or any order of the Bankruptcy Court, or otherwise deemed timely filed under applicable law, or (ii) is not scheduled and is not the subject of a timely filed proof of Claim or a proof of Claim deemed timely filed with the Bankruptcy Court pursuant to either the Bankruptcy Code or any order of the Bankruptcy Court, or otherwise deemed timely filed under applicable law, shall not be treated as a creditor with respect to such Claim for purposes of voting on the Plan.

9. **Executory Contracts and Unexpired Leases.** Subject to the occurrence of the Effective Date under the Plan, all executory contracts and unexpired leases to which the Debtor is a party, and which have not expired by their own terms on or prior to the Confirmation Date, shall be deemed assumed, and, if applicable, assigned, except for an executory contract or unexpired lease that (a) has previously been assumed, assumed and assigned, or rejected pursuant to a Final Order of the Bankruptcy Court, (b) is specifically designated as a contract or unexpired lease to be rejected on the Schedule of Rejected Contracts and Leases in the Plan Supplement, (c) is the subject of a rejection motion filed by the Debtor under section 365 of the Bankruptcy Code prior to the Confirmation Date with respect to which there is not yet a Final Order of the Bankruptcy Court, or (d) is the subject of a pending Cure Dispute.

10. **Additional Information.** Any party in interest wishing to obtain information about the solicitation procedures or copies of the Disclosure Statement or the Plan should contact the Debtor's voting agent, Prime Clerk, at (844) 276-3030 (domestic) or (917) 962-8891 (international), sigaballots@primeclerk.com, or may view such documents by accessing the Debtor's website:

[cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/) or the Bankruptcy Court's website: <http://nysb.uscourts.gov>. As previously noted above, a PACER ([www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)) password and login are needed to access documents on the Bankruptcy Court's website (<http://nysb.uscourts.gov>). **PRIME CLERK IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

Dated: New York, New York  
[\_\_\_\_], 2016

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*

**Exhibit D**

**Form of Ballot**

**Class 3 - General Unsecured Claims**

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

-----X	
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>SIGA TECHNOLOGIES, INC.,</b>	: <b>14-12623 (SHL)</b>
	:
<b>Debtor.</b>	:
	:
-----X	

**BALLOT FOR ACCEPTING OR REJECTING  
CHAPTER 11 PLAN OF SIGA TECHNOLOGIES, INC.**

**BALLOT FOR: CLASS 3 – GENERAL UNSECURED CLAIMS**

SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”) is soliciting votes with respect to the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”), from the holders of certain impaired Claims against the Debtor. All capitalized terms used but not defined herein have the meanings ascribed to such terms in the Plan. If you have any questions on how to properly complete this Ballot, please call Prime Clerk LLC (the “**Voting Agent**”) at (844) 276-3030 (domestic toll-free) or (917) 962-8891 (international) or email sigaballots@primeclerk.com. **THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

**This Ballot is to be used for voting by holders of Class 3 – General Unsecured Claims. In order for your vote to be counted, this Ballot must be properly completed, signed, and returned to the Voting Agent so that it is actually received no later than 4:00 p.m. (Eastern Time) on [\_\_\_\_], 2016 (the “Voting Deadline”), unless such time is extended by the Debtor.**

This Ballot is solely for purposes of voting to accept or reject the Plan and not for the purpose of allowance or disallowance of, or distribution on account of, Class 3 – General Unsecured Claims.

**INSTRUCTIONS FOR COMPLETING THE BALLOT**

This Ballot is submitted to you to solicit your vote to accept or reject the Plan. The terms of the Plan are described in the Disclosure Statement for the Debtor’s Chapter 11 Plan (as it may be amended, the “**Disclosure Statement**”), including all exhibits thereto. **PLEASE READ THE PLAN AND THE DISCLOSURE STATEMENT CAREFULLY BEFORE COMPLETING THIS BALLOT.**

The Plan will be accepted by Class 3 (General Unsecured Claims) if it is accepted by the holders of two-thirds (2/3) in amount and more than one-half (1/2) in number of Claims in Class 3 (General Unsecured Claims) voting on the Plan. Class 3 (General Unsecured Claims) is

[BALLOT CODE]

the only Class of Claims entitled to vote on the Plan. If the Plan is confirmed by the Bankruptcy Court, all holders of Claims against, and Equity Interests in, the Debtor (including those holders who abstain from voting on or reject the Plan, and those holders who are not entitled to vote on the Plan) will be bound by the confirmed Plan and the transactions contemplated thereunder, whether or not they vote and whether or not they accept the Plan.

**To have your vote counted, you must complete, sign, and return this Ballot so that it its received by the Voting Agent at the address listed below no later than the Voting Deadline, unless such time is extended by the Debtor. Ballots must be delivered to the Voting Agent (i) at the address listed below (or in the enclosed envelope, which may have a different zip code) or (ii) via Prime Clerk’s E-Ballot platform by visiting <https://cases.primeclerk.com/siga>, clicking on the “E-Ballot” link and following the instructions set forth on the website. Holders are encouraged to submit their Ballots via the E-Ballot platform. If you choose to submit your Ballot via the E-Ballot platform, you should NOT submit your hard copy Ballot as well. Please choose only one form of return of your Ballot.**

**If by standard, overnight, or hand delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022

**Ballots will not be accepted by telecopy, facsimile, or other electronic means of transmission (except via Prime Clerk’s E-Ballot platform).**

To properly complete the Ballot, you must follow the procedures described below:

- a. Make sure that the information contained in Item 1 is correct;
- b. If you hold a Claim in Class 3 (General Unsecured Claims), cast one vote to accept or reject the Plan by checking the appropriate box in Item 2;
- c. Check the appropriate box in Item 3;
- d. If you are completing this Ballot on behalf of another entity, indicate your relationship with such entity and the capacity in which you are signing on the appropriate line in Item 4. By submitting the Ballot you are certifying that you have authority to so act and agree to provide documents evidencing such authority upon request (*e.g.*, a power of attorney or a certified copy of board resolutions authorizing you to so act);
- e. If more than one timely, properly completed Ballot is received, only the latest received, properly completed Ballot will be counted, unless the holder of the

Claim receives Bankruptcy Court approval to have the Ballot that was earlier received be counted;

- f. Provide your name, mailing address, and any remaining information requested;
- g. Sign and date your Ballot; and
- h. Return your Ballot with an original signature to the Voting Agent.

**IF YOU (I) HAVE ANY QUESTIONS REGARDING THE BALLOT,  
(II) DID NOT RECEIVE A RETURN ENVELOPE WITH YOUR BALLOT,  
(III) DID NOT RECEIVE A COPY OF THE DISCLOSURE STATEMENT OR PLAN,  
OR (IV) NEED ADDITIONAL COPIES OF THE BALLOT OR OTHER ENCLOSED  
MATERIALS, PLEASE CONTACT THE VOTING AGENT BY CALLING (844) 276-  
3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL) OR EMAIL  
SIGABALLOTS@PRIMECLERK.COM. PLEASE DO NOT DIRECT ANY INQUIRIES  
TO THE BANKRUPTCY COURT. THE VOTING AGENT IS NOT AUTHORIZED TO,  
AND WILL NOT, PROVIDE LEGAL ADVICE.**



**PLEASE COMPLETE THE FOLLOWING:**

**Item 1. Amount of Class 3 (General Unsecured Claims) Claim.** For purposes of voting to accept or reject the Plan, the undersigned certifies that as of \_\_\_\_\_, 2016, the undersigned holds a Class 3 (General Unsecured Claims) Claim against the Debtor listed below in the amount set forth below.

<b>Claim Amount:</b>	\$[_____]
<b>Debtor:</b>	SIGA Technologies, Inc.

**Item 2. Vote on the Plan.** The undersigned holder of a Class 3 (General Unsecured Claims) Claim in the amount set forth in Item 1 above hereby votes to:

- Check one box only:**
- Accept the Plan
- Reject the Plan

**To submit your Ballot via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/SIGA>. Click on the “E-Ballot” section of the website and follow the instructions to submit your Ballot.**

**IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:**

**Unique E-Ballot ID#:** \_\_\_\_\_

**Prime Clerk’s “E-Ballot” platform is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email or other means of electronic transmission will not be counted.**

**Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.**

Creditors who cast a Ballot using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

**Item 3. Acknowledgements and Certification.** By signing this Ballot, the undersigned acknowledges that the undersigned has been provided with: a copy of the Disclosure Statement, including the Plan and all other exhibits thereto; a Confirmation Hearing Notice; and a copy of the Order approving the Disclosure Statement without exhibits. The undersigned certifies that (i) it is the holder of the Class 3 (General Unsecured Claims) Claim identified in Item 1 above and (ii) it has full power and authority to vote to accept or reject the Plan. The undersigned further acknowledges that the Debtor' solicitation of votes is subject to all terms and conditions set forth in the Disclosure Statement, the Order approving the Disclosure Statement, and the procedures for the solicitation of votes to accept or reject the Plan contained therein.

Print or Type Name of Claimant: \_\_\_\_\_  
Social Security or Federal Tax I.D. No. of Claimant: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Name of Signatory (if different than claimant): \_\_\_\_\_  
If by Authorized Agent, Title of Agent: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_  
Date Completed: \_\_\_\_\_

Please check one or both of the below boxes if the above address is a change of address for the purpose(s) of:

- Future notice mailings in this chapter 11 case; and/or
- Distributions, if any, upon your Claim in this chapter 11 case

**Exhibit E**

**Notice of Non-Voting Status – Unimpaired Classes**

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

-----X  
: **Chapter 11 Case No.**  
: **14-12623 (SHL)**  
: **Debtor.**  
:   
:   
-----X

**NOTICE OF NON-VOTING STATUS TO UNIMPAIRED CLASSES<sup>1</sup>**

PLEASE TAKE NOTICE THAT on [\_\_\_\_\_], 2016, the United States Bankruptcy Court for the Southern District of New York approved the Disclosure Statement for the Debtor’s Chapter 11 Plan, dated [\_\_\_\_\_], 2016 (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”), for use by the Debtor in soliciting acceptances or rejections of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”).

**UNDER THE TERMS OF THE PLAN, YOUR CLAIM(S) AGAINST THE DEBTOR ARE NOT IMPAIRED AND, THEREFORE, PURSUANT TO SECTION 1126(f) OF TITLE 11, UNITED STATES CODE, YOU ARE (I) DEEMED TO HAVE ACCEPTED THE PLAN AND (II) NOT ENTITLED TO VOTE ON THE PLAN. IF YOU HAVE ANY QUESTIONS ABOUT THE STATUS OF YOUR CLAIM(S), OR WISH TO REQUEST A COPY OF THE PLAN AND DISCLOSURE STATEMENT (AT NO COST TO YOU), CONTACT THE DEBTOR’S VOTING AGENT, PRIME CLERK LLC, AT THE ADDRESS BELOW, OR BY TELEPHONE AT (844) 276-3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL). THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

**If by standard, overnight. or hand delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022

<sup>1</sup> The Unimpaired Classes under the Plan are Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims).

**Exhibit F**

**Notice of Non-Voting Status – Equity Interests**

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

-----X  
:
  
**In re** : **Chapter 11 Case No.**  
:
  
**SIGA TECHNOLOGIES, INC.,** : **14-12623 (SHL)**  
:
  
:
  
**Debtor.** :
  
:
  
-----X

**NOTICE OF NON-VOTING STATUS TO CLASS OF EQUITY INTERESTS<sup>8</sup>**

PLEASE TAKE NOTICE THAT on [\_\_\_\_], 2016, the United States Bankruptcy Court for the Southern District of New York approved the Disclosure Statement for the Debtor’s Chapter 11 Plan, dated [\_\_\_\_], 2016 (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”), for use by the Debtor in soliciting acceptances or rejections of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”). Copies of the Disclosure Statement and Plan are included on the enclosed CD.

**UNDER THE TERMS OF THE PLAN, EQUITY INTERESTS IN THE DEBTOR MAY BE CANCELLED WITHOUT ANY FURTHER NOTICE, DISCLOSURE, CONSENT, CORPORATE ACTION, OR WITHOUT ANY STOCKHOLDER VOTE OR BANKRUPTCY COURT ORDER IF UNDER THE PLAN THE ALLOWED CLAIM OF PHARMATHENE INC. IS TREATED BY DELIVERING TO PHARMATHENE ALL OF THE EQUITY OF THE REORGANIZED DEBTOR. IN VIEW OF THIS POTENTIAL CIRCUMSTANCE, THE PLAN PROVIDES THAT THE CLASS OF EQUITY INTERESTS (CLASS 4) IS DEEMED TO HAVE REJECTED THE PLAN AND, THEREFORE, NOT ENTITLED TO VOTE ON THE PLAN.**

**IF YOU HAVE ANY QUESTIONS, CONTACT THE DEBTOR’S VOTING AGENT, PRIME CLERK LLC, AT THE ADDRESS BELOW, OR BY TELEPHONE AT (844) 276-3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL). THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

<p><b>If by standard, overnight. or hand delivery:</b>  SIGA Ballot Processing  c/o Prime Clerk LLC  830 3rd Avenue, 3rd Floor  New York, New York 10022</p>
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<sup>8</sup> The Class of Equity Interests deemed to reject the Plan is Class 4 (Equity Interests).

**Exhibit G**

**Proposed Order**

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

-----X  
: **Chapter 11 Case No.**  
: **14-12623 (SHL)**  
: **Debtor.**  
:   
:   
-----X

**ORDER (I) APPROVING NOTICE OF DISCLOSURE STATEMENT HEARING;  
(II) APPROVING DISCLOSURE STATEMENT; (III) ESTABLISHING A  
RECORD DATE; (IV) ESTABLISHING NOTICE AND OBJECTION  
PROCEDURES FOR CONFIRMATION OF THE PLAN; (V) APPROVING  
SOLICITATION PACKAGES AND PROCEDURES FOR DISTRIBUTION THEREOF;  
(VI) APPROVING THE FORM OF BALLOT AND ESTABLISHING  
PROCEDURES FOR VOTING ON THE PLAN; AND (VII) APPROVING THE FORM  
OF NOTICE TO NON-VOTING CLASSES UNDER THE PLAN**

Upon the Motion, dated January 5, 2016 (the “**Motion**”),<sup>1</sup> of SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”), pursuant to sections 105, 502, 1125, 1126, and 1128 of title 11, United States Code (the “**Bankruptcy Code**”); Rules 2002, 3017, 3018, and 3020 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rules 3017-1, 3018-1, and 3020-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”) for entry of an order (i) approving notice of the Disclosure Statement Hearing provided by the Debtor; (ii) approving the Disclosure Statement under section 1125 of the Bankruptcy Code; (iii) establishing a record date for notice of the Confirmation Hearing (as defined below) and for voting on the Plan; (iv) establishing notice and objection procedures with respect to the hearing to consider confirmation of the Plan; (v) approving the Notice Packages (as defined below) and procedures for the distribution thereof; (vi) approving

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.



the form of ballot and establishing procedures for voting on the Plan; and (vii) approving the form of notice to non-voting classes under the Plan, all as more fully described in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtor, its estate, creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

FOUND AND DETERMINED THAT:<sup>2</sup>

A. The Disclosure Statement contains adequate information within the meaning of section 1125 of the Bankruptcy Code.

B. The form of Ballot (as defined below), substantially in the form annexed hereto as **Exhibit “A”** (the “**Ballot**”), is sufficiently consistent with Official Form No. 14, adequately addresses the particular needs of this case, and is appropriate for the Class entitled to vote on the Plan.

C. Ballots need not be provided to the holders of Claims in (i) Class 1 (Secured Claims) and (ii) Class 2 (Priority Non-Tax Claims) because they are unimpaired and, therefore, conclusively presumed to accept the Plan.

D. Ballots need not be provided to the holders of Equity Interests in Class 4 (Equity Interests) because under the Plan they are deemed to reject the Plan.

E. The period, set forth below, during which the Debtor may solicit acceptances of the Plan is a reasonable period of time for entities entitled to vote on the Plan to make an informed decision to either accept or reject the Plan.

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<sup>2</sup> Findings of fact shall be construed as conclusions of law and conclusions of law shall be construed as findings of fact when appropriate. *See* Fed. R. Bankr. P. 7052.

F. The procedures for the solicitation and tabulation of votes to accept or reject the Plan (as more fully set forth in the Motion) provide for a fair and equitable voting process and are consistent with section 1126 of the Bankruptcy Code.

G. The procedures for transmitting the documents and information required by Bankruptcy Rule 3017(d) to the record holders and beneficial holders of the Debtor's Existing Common Stock are adequate and appropriate.

H. The procedures set forth below regarding notice to all parties in interest of the time, date, and place of the hearing to consider confirmation of the Plan (the "**Confirmation Hearing**") and the filing of objections thereto, and the distribution and contents of the Notice Packages, including the Confirmation Hearing Notice, comply with Bankruptcy Rules 2002 and 3017 and constitute sufficient notice to all interested parties.

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND  
DECREED THAT:

1. The Motion is granted as provided herein.
2. The Disclosure Statement is approved.
3. The form and manner of notice of the time set for filing objections to, and the hearing to consider approval of, the Disclosure Statement as described in the Motion and reflected in the Affidavit of Service filed by the Debtor's Voting Agent, Prime Clerk LLC. ("**Prime Clerk**") (ECF No. [\_\_\_\_]), was proper, adequate, and sufficient notice thereof.
4. The Ballots are approved and to be distributed to the holders of Claims in Class 3 (General Unsecured Claims) under the Plan, which Class is entitled to vote to accept or reject the Plan.

5. The Record Date for purposes of determining which parties (i) are entitled to vote on the Plan, (ii) will receive a Notice of Non-Voting Status (as defined below), and (iii) will receive the Confirmation Hearing Notice shall be February 2, 2016.

6. All Ballots must be properly executed, completed, and delivered to Prime Clerk by (i) mail, in the return envelope provided with each, (ii) electronic, online submission at Prime Clerk's website (as described more fully in paragraph 7 below); (iii) overnight courier, or (iv) personal delivery so that they are actually received by Prime Clerk no later than 4:00 p.m. (Eastern Time) on \_\_\_\_\_, 2016 (the "**Voting Deadline**").

**If by standard, overnight. or hand  
delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022

7. Holders may cast an E-Ballot and electronically sign and submit such electronic Ballot via Prime Clerk's E-Ballot platform. Instructions for casting an electronic Ballot can be found on the "E-Ballot" section of Prime Clerk's website. The encrypted ballot data and audit trail created by such electronic submission shall become part of the record of any electronic Ballot submitted in this manner and the creditor's electronic signature will be deemed to be an original signature that is legally valid and effective. For the avoidance of doubt, holders may only cast Ballots electronically via the E-Ballot platform. Ballots submitted by electronic mail, facsimile or any other means of electronic submission not specifically authorized by the solicitation procedures shall not be counted.

8. On or before \_\_\_\_\_, 2016, the Debtor shall mail or caused to be mailed a Notice of Non-Voting Status – Unimpaired Classes (the "**Notice of Non-Voting Status**

– **Unimpaired Claims**”), substantially in the form annexed hereto as **Exhibit “B,”** and the Confirmation Hearing Notice, substantially in the form annexed hereto as **Exhibit “D,”** to the holders of Claims in Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims), which Classes are unimpaired and therefore not entitled to vote to accept or reject the Plan.

9. On or before \_\_\_\_\_, 2016, the Debtor shall distribute a Notice of Non-Voting Status – Equity Interests (the “**Notice of Non-Voting Status – Equity Interests**” and together with the Notice of Non-Voting Status – Unimpaired Claims, the “**Non-Voting Status Notices**”), substantially in the form annexed hereto as **Exhibit “C,”** the Confirmation Hearing Notice, substantially in the form annexed hereto as **Exhibit “D,”** and the Plan and Disclosure Statement to the record holders of Equity Interests in Class 4 (Equity Interests) as of the close of business on the Record Date, which Class is deemed to reject the plan and not entitled to vote to accept or reject the Plan.

10. The Notice of Non-Voting Status – Unimpaired Class satisfies the requirements of the Bankruptcy Code and the Bankruptcy Rules, and the Debtor, therefore, is not required to distribute copies of the Plan and the Disclosure Statement to any holder of a Claim in Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims), unless such party otherwise makes a request in writing to the Debtor on or before \_\_\_\_\_, 2016 for a copy of the Plan or the Disclosure Statement.

11. Solely for the purpose of voting to accept or reject the Plan and not for the purpose of the allowance of, or distribution on account of, a Claim, and without prejudice to the rights of the Debtor or the applicable creditor in any other context, each Claim in Class 3 (General Unsecured Claims) entitled to vote to accept or reject the Plan is to be temporarily allowed (in an amount equal to the amount of such Claim as set forth in a timely filed proof of

Claim, or, if no proof of Claim was filed, the amount of such Claim as set forth in the applicable Debtor's schedules of liabilities, dated October 30, 2014, (as amended, the "**Schedules**"),

*provided, however, that:*

- (a) If a Claim is deemed Allowed (as defined in the Plan), pursuant to the Plan, such Claim shall be Allowed for voting purposes in the deemed Allowed amount set forth in the Plan;
- (b) If a Claim, for which a proof of Claim has been timely filed, is wholly contingent, unliquidated, or disputed, such Claim shall be allowed for voting purposes only, and not for purposes of allowance or distribution, at \$1.00, unless such Claim is disputed in the manner set forth in subparagraph 11(f) below;
- (c) If a Claim, for which a proof of Claim was timely filed, lists an amount that is liquidated and noncontingent, such Claim shall be temporarily allowed in the amount set forth on the proof of Claim, unless such claim is disputed in the manner set forth in subparagraph 11(f) below;
- (d) If a Claim, for which a proof of Claim was timely filed, lists an amount that is partially liquidated and partially unliquidated, such Claim shall be temporarily allowed only in the liquidated amount set forth on the proof of Claim, unless such claim is disputed in the manner set forth in subparagraph 11(f) below;
- (e) If a Claim has been estimated for voting purposes or otherwise allowed for voting purposes by order of the Court, such Claim shall be allowed in the amount so estimated or allowed by the Court for voting purposes only, and not for purposes of allowance or distribution, unless otherwise provided by order of the Court;
- (f) If a Claim is listed in the Schedules as contingent, unliquidated, disputed, in the amount of \$0.00, or unknown, and a proof of Claim was not (i) filed by the applicable bar date for the filing of proofs of Claim established by the Court or (ii) deemed timely filed by an order of the Court prior to the Voting Deadline, unless the Debtor has consented in writing, such Claim shall be disallowed for voting purposes;
- (g) If the Debtor serves an objection to, or request for estimation of, a Claim at least 20 days before the Voting Deadline, such Claim shall be temporarily disallowed for voting purposes only and not for purposes of allowance or distribution, except to the extent and in the manner as may be set forth in the objection or request for estimation;

- (h) If the Debtor serves an objection to a Claim at least 20 days before the Voting Deadline, and the relief sought in that objection is to supersede one or more scheduled Claims with a filed Claim, such scheduled Claim shall be temporarily disallowed for voting purposes only and not for purpose of allowance or distribution; *provided, however*, that in the event the holder of such Claims has returned only the Ballot in connection with the scheduled Claim(s), such Ballot shall be counted in the amount of the filed Claim;
- (i) For purposes of voting, classification, and treatment under the Plan, each party that holds or has filed more than one Claim in a particular class shall be treated as if such entity has only one Claim, the Claims filed by such entity shall be aggregated, and the total dollar amount of such Claims shall be the sum of the aggregated Claims of such entity;
- (j) Notwithstanding anything contained herein to the contrary, the Voting Agent, in its discretion, may contact entities entitled to vote to cure any defects in the Ballots and is authorized to so cure any defects;
- (k) There shall be a rebuttable presumption that in the case where more than one timely, properly completed Ballot is received, only the latest received, properly completed Ballot will be counted unless the holder of the Claim receives Court approval to have the Ballot that was received earlier be counted;
- (l) If a Claim is filed in the amount of \$0.00, the holder of such Claim shall not be entitled to vote on account of such Claim; and
- (m) If a Claim is filed in a currency other than U.S. Dollars and is not Allowed in a sum certain pursuant to the Plan, the holder of such Claim shall be entitled to vote a Claim in the amount of \$1.00.
- (n) Notwithstanding anything contained herein to the contrary, the PharmAthene Claim (as defined in the Plan) shall be deemed allowed for voting purposes only in the amount of \$205 million (the foregoing shall be without prejudice to the actual amount of the PharmAthene Allowed Claim as determined pursuant to the PharmAthene Final Order).

12. If a holder of a Claim seeks to challenge the allowance (or disallowance)

of its Claim for voting purposes, in accordance with the above procedures, such holder is directed to serve on the Debtor and file with the Court (with a hard copy delivered directly to Chambers) on or before the tenth (10th) day after the later of (i) service of the Confirmation Hearing Notice and (ii) service of notice of an objection or request for estimation, if any, to such

Claim, a motion for an order pursuant to Bankruptcy Rule 3018(a) temporarily allowing such Claim for purposes of voting to accept or reject the Plan.

13. If a holder of a Claim files a motion pursuant to Bankruptcy Rule 3018(a), such holder's Ballot shall not be counted unless temporarily allowed by the Court for voting purposes pursuant to an order entered at least six (6) days prior to the Voting Deadline or as otherwise directed by the Court.

14. Any Ballot that is properly completed, executed, and timely returned to Prime Clerk but does not indicate an acceptance or rejection of the Plan, or indicates both an acceptance and a rejection of the Plan, shall not be counted.

15. The following types of Ballots shall not be counted in determining whether the Plan has been accepted or rejected: (i) any Ballot received after the applicable Voting Deadline unless the Debtor shall have granted, in writing, an extension of the Voting Deadline with respect to such Ballot, (ii) any Ballot that is illegible or contains insufficient information to permit the identification of the holder of the Claim, (iii) any Ballot cast by a person or entity that does not hold a Claim in a Class that is entitled to vote to accept or reject the Plan, (iv) any Ballot cast for a Claim identified in the Schedules as unliquidated, contingent, or disputed for which no proof of Claim was timely filed, (v) any Ballot that is unsigned or without an original signature, and (vi) any Ballot transmitted to Prime Clerk by facsimile, electronic transmission, or other electronic means not specifically authorized herein.

16. Prime Clerk, in its discretion, may contact entities entitled to vote to cure any defects in the Ballots and is authorized to cure any defects.

17. There shall be a rebuttable presumption that if more than one timely, properly completed Ballot for a particular Claim is received, only the Ballot that bears the latest

date will be counted unless the holder of the Claim receives Court approval to have the Ballot that bears the earliest date counted.

18. For holders of Claims subject to the February 2, 2016 Record Date, no transfer of Claim(s) pursuant to Bankruptcy Rule 3001 shall be recognized unless (i) documentation evidencing such transfer was filed with the Court on or before twenty-two (22) days prior to the Record Date, (ii) the transfer is not defective, and (iii) no timely objection with respect to such transfer was filed by the transferor. In instances where a Claim has been the subject of one or more partial transfers, each holder of a portion of said Claim shall be deemed to hold one Claim for numerosity purposes.

19. The Confirmation Hearing will be held on \_\_\_\_\_, 2016 at \_:\_\_\_m. (Eastern Time); *provided, however*, that the Confirmation Hearing may be continued from time to time without further notice other than through adjournments announced in open Court or as indicated in any notice of agenda of matters scheduled for hearing filed with the Court.

20. Any objections to confirmation of the Plan must:
- (a) Be in writing;
  - (b) State the name and address of the objecting party and the amount and nature of the Claim or Equity Interest of such party;
  - (c) State with particularity the basis and nature of any objection;
  - (d) Conform with the Bankruptcy Rules and the Local Rules;
  - (e) Be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court's case filing system, electronically in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>) and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable; and



- (f) Be served in accordance with General Order M-399 so as to be received no later than \_\_\_\_\_, 2016 at 4:00 p.m. (Eastern Time) (the “**Plan Confirmation Objection Deadline**”) and on the following parties —
- (i) The Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire);
  - (ii) The attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq.);
  - (iii) The Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); and

The attorneys for the statutory creditors’ committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.).

21. Objections to confirmation of the Plan that are not timely filed and served in the manner set forth above shall not be considered and shall be deemed overruled.

22. Responsive pleadings to any objection to confirmation of the Plan shall be filed by no later than \_\_\_\_\_, 2016 at 12:00 noon (Eastern Time).

23. The Confirmation Hearing Notice, substantially in the form annexed hereto as **Exhibit “D,”** is approved.

24. On or before \_\_\_\_\_, 2016, the Debtor shall mail or caused to be mailed the following materials (the “**Notice Packages**”) in connection with voting on the Plan, notice of the Confirmation Hearing, and the filing of objections to confirmation of the Plan:

- (a) With respect to holders of Claims in Class 3 (General Unsecured Claims):
  - (i) A copy of this Order;
  - (ii) The Confirmation Hearing Notice;

- (iii) The Disclosure Statement (with the Plan annexed thereto);<sup>3</sup> and
  - (iv) A form of Ballot and appropriate return envelope with prepaid postage.
- (b) With respect to holders of Claims in Class 1(Secured Claims) and Class 2 (Priority Non-Tax Claims) that are unimpaired and not entitled to vote on the Plan:
- (i) The Confirmation Hearing Notice; and
  - (ii) A Notice of Non-Voting Status – Unimpaired Classes.
- (c) With respect to holders of Equity Interests in Class 4 (Equity Interests) which Class is deemed to reject the Plan and therefore is not voting on the Plan:
- (i) A copy of this Order;
  - (ii) The Confirmation Hearing Notice;
  - (iii) A Notice of Non-Voting Status – Equity Interests; and
  - (iv) The Disclosure Statement (with the Plan annexed thereto).

25. On or before \_\_\_\_\_, 2016, the Debtor shall mail or cause to be mailed a copy of the Confirmation Hearing Notice (to the extent not already provided above) to:

- (i) All Notice Parties;
- (ii) All persons or entities that filed proofs of Claim on or before the date of the Disclosure Statement Hearing, except to the extent their respective Claim was paid pursuant to, or expunged by, prior order of the Court;
- (iii) All persons or entities listed in the Schedules as holding liquidated, noncontingent, and undisputed Claims in an amount greater than \$0.00, other than scheduled Claims that have been superseded by a filed proof of Claim;
- (iv) The registered and beneficial holders of the Debtor’s Existing Common Stock as of the Record Date;

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<sup>3</sup> Copies of the materials contained in the Notice Packages (excluding the Confirmation Hearing Notice and the Ballots) may be provided on CD-ROM at the Debtor’s discretion; *provided, however*, that any party may request to receive paper copies of such materials from Prime Clerk at no cost to such party.

- (v) All other parties in interest that have filed a request for notice pursuant to Bankruptcy Rule 2002 in the Debtor's chapter 11 cases prior to the date of the Disclosure Statement Hearing; and
- (vi) Any other known holders of Claims against, or Equity Interests in, the Debtor.

26. Notice Packages for holders of Claims in (i) Class 1 (Secured Claims), (ii) Class 2 (Priority Non-Tax Claims), and (iii) Class 4 (Equity Interests), which Classes are either impaired or deemed to reject the Plan, will not include a Ballot.

27. The Debtor shall not be required to send Notice Packages or any other notice to holders of Claims that have already been paid in full; *provided, however*, that if, and to the extent that, any such holder would be entitled to receive a Notice Package or any other notice for any reason other than by virtue of the fact that its Claim had been scheduled by the Debtor, then such holder shall be sent a notice in accordance with the procedures set forth herein.

28. The Debtor shall publish the Confirmation Hearing Notice not less than 20 calendar days before the Plan Confirmation Objection Deadline once in *The Wall Street Journal* (National Edition). Additionally, the Confirmation Hearing Notice shall be posted electronically on the website maintained for the Debtor by Prime Clerk, [cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/).

29. With respect to addresses from which notices in this chapter 11 case have been returned as undeliverable by the United States Postal Service, the Debtor is excused from mailing Notice Packages or other notice to the entities listed at such addresses, unless the Debtor is provided with accurate addresses for such entities at least twenty (20) days before the Confirmation Hearing. Failure to mail the Notice Packages to such entities shall neither constitute inadequate notice of the Confirmation Hearing or the Voting Deadline, nor violate Bankruptcy Rule 3017(d).

30. The Debtor is authorized to take or refrain from taking any action necessary or appropriate to implement the terms of and the relief granted in this Order without seeking further order of the Court.

31. The Debtor, in consultation with the Committee, is authorized to make nonsubstantive and nonmaterial changes to the Disclosure Statement, the Plan, the Notice Packages, and related documents without further order of the Court, including, without limitation, changes to correct typographical and grammatical errors and to make conforming changes among such documents.

32. The notice to be provided pursuant to the procedures set forth herein is good and sufficient notice to all parties in interest, and no other for further notice need be provided.

33. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2016

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United States Bankruptcy Judge

**EXHIBIT A**

**BALLOT**

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

-----X	
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>SIGA TECHNOLOGIES, INC.,</b>	: <b>14-12623 (SHL)</b>
	:
<b>Debtor.</b>	:
	:
-----X	

**BALLOT FOR ACCEPTING OR REJECTING  
CHAPTER 11 PLAN OF SIGA TECHNOLOGIES, INC.**

**BALLOT FOR: CLASS 3 – GENERAL UNSECURED CLAIMS**

SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”) is soliciting votes with respect to the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”), from the holders of certain impaired Claims against the Debtor. All capitalized terms used but not defined herein have the meanings ascribed to such terms in the Plan. If you have any questions on how to properly complete this Ballot, please call Prime Clerk LLC (the “**Voting Agent**”) at (844) 276-3030 (domestic toll-free) or (917) 962-8891 (international) or email sigaballots@primeclerk.com. **THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

**This Ballot is to be used for voting by holders of Class 3 – General Unsecured Claims. In order for your vote to be counted, this Ballot must be properly completed, signed, and returned to the Voting Agent so that it is actually received no later than 4:00 p.m. (Eastern Time) on [\_\_\_\_], 2016 (the “Voting Deadline”), unless such time is extended by the Debtor.**

This Ballot is solely for purposes of voting to accept or reject the Plan and not for the purpose of allowance or disallowance of, or distribution on account of, Class 3 – General Unsecured Claims.

**INSTRUCTIONS FOR COMPLETING THE BALLOT**

This Ballot is submitted to you to solicit your vote to accept or reject the Plan. The terms of the Plan are described in the Disclosure Statement for the Debtor’s Chapter 11 Plan (as it may be amended, the “**Disclosure Statement**”), including all exhibits thereto. **PLEASE READ THE PLAN AND THE DISCLOSURE STATEMENT CAREFULLY BEFORE COMPLETING THIS BALLOT.**

The Plan will be accepted by Class 3 (General Unsecured Claims) if it is accepted by the holders of two-thirds (2/3) in amount and more than one-half (1/2) in number of Claims in Class 3 (General Unsecured Claims) voting on the Plan. Class 3 (General Unsecured Claims) is

[BALLOT CODE]

the only Class of Claims entitled to vote on the Plan. If the Plan is confirmed by the Bankruptcy Court, all holders of Claims against, and Equity Interests in, the Debtor (including those holders who abstain from voting on or reject the Plan, and those holders who are not entitled to vote on the Plan) will be bound by the confirmed Plan and the transactions contemplated thereunder, whether or not they vote and whether or not they accept the Plan.

**To have your vote counted, you must complete, sign, and return this Ballot so that it its received by the Voting Agent at the address listed below no later than the Voting Deadline, unless such time is extended by the Debtor. Ballots must be delivered to the Voting Agent (i) at the address listed below (or in the enclosed envelope, which may have a different zip code) or (ii) via Prime Clerk’s E-Ballot platform by visiting <https://cases.primeclerk.com/siga>, clicking on the “E-Ballot” link and following the instructions set forth on the website. Holders are encouraged to submit their Ballots via the E-Ballot platform. If you choose to submit your Ballot via the E-Ballot platform, you should NOT submit your hard copy Ballot as well. Please choose only one form of return of your Ballot.**

**If by standard, overnight, or hand delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022

**Ballots will not be accepted by telecopy, facsimile, or other electronic means of transmission (except via Prime Clerk’s E-Ballot platform).**

To properly complete the Ballot, you must follow the procedures described below:

- a. Make sure that the information contained in Item 1 is correct;
- b. If you hold a Claim in Class 3 (General Unsecured Claims), cast one vote to accept or reject the Plan by checking the appropriate box in Item 2;
- c. Check the appropriate box in Item 3;
- d. If you are completing this Ballot on behalf of another entity, indicate your relationship with such entity and the capacity in which you are signing on the appropriate line in Item 4. By submitting the Ballot you are certifying that you have authority to so act and agree to provide documents evidencing such authority upon request (*e.g.*, a power of attorney or a certified copy of board resolutions authorizing you to so act);
- e. If more than one timely, properly completed Ballot is received, only the latest received, properly completed Ballot will be counted, unless the holder of the

Claim receives Bankruptcy Court approval to have the Ballot that was earlier received be counted;

- f. Provide your name, mailing address, and any remaining information requested;
- g. Sign and date your Ballot; and
- h. Return your Ballot with an original signature to the Voting Agent.

**IF YOU (I) HAVE ANY QUESTIONS REGARDING THE BALLOT,  
(II) DID NOT RECEIVE A RETURN ENVELOPE WITH YOUR BALLOT,  
(III) DID NOT RECEIVE A COPY OF THE DISCLOSURE STATEMENT OR PLAN,  
OR (IV) NEED ADDITIONAL COPIES OF THE BALLOT OR OTHER ENCLOSED  
MATERIALS, PLEASE CONTACT THE VOTING AGENT BY CALLING (844) 276-  
3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL) OR EMAIL  
SIGABALLOTS@PRIMECLERK.COM. PLEASE DO NOT DIRECT ANY INQUIRIES  
TO THE BANKRUPTCY COURT. THE VOTING AGENT IS NOT AUTHORIZED TO,  
AND WILL NOT, PROVIDE LEGAL ADVICE.**



**PLEASE COMPLETE THE FOLLOWING:**

**Item 1. Amount of Class 3 (General Unsecured Claims) Claim.** For purposes of voting to accept or reject the Plan, the undersigned certifies that as of \_\_\_\_\_, 2016, the undersigned holds a Class 3 (General Unsecured Claims) Claim against the Debtor listed below in the amount set forth below.

<b>Claim Amount:</b>	\$_[_____]
<b>Debtor:</b>	SIGA Technologies, Inc.

**Item 2. Vote on the Plan.** The undersigned holder of a Class 3 (General Unsecured Claims) Claim in the amount set forth in Item 1 above hereby votes to:

- Check one box only:**
- Accept the Plan
- Reject the Plan

**To submit your Ballot via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/SIGA>. Click on the “E-Ballot” section of the website and follow the instructions to submit your Ballot.**

**IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:**

**Unique E-Ballot ID#:**\_\_\_\_\_

**Prime Clerk’s “E-Ballot” platform is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email or other means of electronic transmission will not be counted.**

**Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.**

Creditors who cast a Ballot using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

**Item 3. Acknowledgements and Certification.** By signing this Ballot, the undersigned acknowledges that the undersigned has been provided with: a copy of the Disclosure Statement, including the Plan and all other exhibits thereto; a Confirmation Hearing Notice; and a copy of the Order approving the Disclosure Statement without exhibits. The undersigned certifies that (i) it is the holder of the Class 3 (General Unsecured Claims) Claim identified in Item 1 above and (ii) it has full power and authority to vote to accept or reject the Plan. The undersigned further acknowledges that the Debtor' solicitation of votes is subject to all terms and conditions set forth in the Disclosure Statement, the Order approving the Disclosure Statement, and the procedures for the solicitation of votes to accept or reject the Plan contained therein.

Print or Type Name of Claimant: \_\_\_\_\_  
Social Security or Federal Tax I.D. No. of Claimant: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Name of Signatory (if different than claimant): \_\_\_\_\_  
If by Authorized Agent, Title of Agent: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_  
Date Completed: \_\_\_\_\_

Please check one or both of the below boxes if the above address is a change of address for the purpose(s) of:

- Future notice mailings in this chapter 11 case; and/or
- Distributions, if any, upon your Claim in this chapter 11 case

**EXHIBIT B**

**NOTICE OF NON-VOTING STATUS – UNIMPAIRED CLAIMS**

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

-----X  
: **Chapter 11 Case No.**  
: **14-12623 (SHL)**  
: **Debtor.**  
:   
:   
-----X

**NOTICE OF NON-VOTING STATUS TO UNIMPAIRED CLASSES<sup>1</sup>**

PLEASE TAKE NOTICE THAT on [\_\_\_\_], 2016, the United States Bankruptcy Court for the Southern District of New York approved the Disclosure Statement for the Debtor’s Chapter 11 Plan, dated [\_\_\_\_], 2016 (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”), for use by the Debtor in soliciting acceptances or rejections of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”).

**UNDER THE TERMS OF THE PLAN, YOUR CLAIM(S) AGAINST THE DEBTOR ARE NOT IMPAIRED AND, THEREFORE, PURSUANT TO SECTION 1126(f) OF TITLE 11, UNITED STATES CODE, YOU ARE (I) DEEMED TO HAVE ACCEPTED THE PLAN AND (II) NOT ENTITLED TO VOTE ON THE PLAN. IF YOU HAVE ANY QUESTIONS ABOUT THE STATUS OF YOUR CLAIM(S), OR WISH TO REQUEST A COPY OF THE PLAN AND DISCLOSURE STATEMENT (AT NO COST TO YOU), CONTACT THE DEBTOR’S VOTING AGENT, PRIME CLERK LLC, AT THE ADDRESS BELOW, OR BY TELEPHONE AT (844) 276-3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL). THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

**If by standard, overnight. or hand delivery:**

SIGA Ballot Processing  
c/o Prime Clerk LLC  
830 3rd Avenue, 3rd Floor  
New York, New York 10022

<sup>1</sup> The Unimpaired Classes under the Plan are Class 1 (Secured Claims) and Class 2 (Priority Non-Tax Claims).

**EXHIBIT C**

**NOTICE OF NON-VOTING STATUS – EQUITY INTERESTS**

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

-----X  
:
  
**In re** : **Chapter 11 Case No.**  
:
  
**SIGA TECHNOLOGIES, INC.,** : **14-12623 (SHL)**  
:
  
:
  
**Debtor.** :
  
:
  
-----X

**NOTICE OF NON-VOTING STATUS TO CLASS OF EQUITY INTERESTS<sup>8</sup>**

PLEASE TAKE NOTICE THAT on [\_\_\_\_], 2016, the United States Bankruptcy Court for the Southern District of New York approved the Disclosure Statement for the Debtor’s Chapter 11 Plan, dated [\_\_\_\_], 2016 (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc., as debtor and debtor in possession (the “**Debtor**”), for use by the Debtor in soliciting acceptances or rejections of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”). Copies of the Disclosure Statement and Plan are included on the enclosed CD.

**UNDER THE TERMS OF THE PLAN, EQUITY INTERESTS IN THE DEBTOR MAY BE CANCELLED WITHOUT ANY FURTHER NOTICE, DISCLOSURE, CONSENT, CORPORATE ACTION, OR WITHOUT ANY STOCKHOLDER VOTE OR BANKRUPTCY COURT ORDER IF UNDER THE PLAN THE ALLOWED CLAIM OF PHARMATHENE INC. IS TREATED BY DELIVERING TO PHARMATHENE ALL OF THE EQUITY OF THE REORGANIZED DEBTOR. IN VIEW OF THIS POTENTIAL CIRCUMSTANCE, THE PLAN PROVIDES THAT THE CLASS OF EQUITY INTERESTS (CLASS 4) IS DEEMED TO HAVE REJECTED THE PLAN AND, THEREFORE, NOT ENTITLED TO VOTE ON THE PLAN.**

**IF YOU HAVE ANY QUESTIONS, CONTACT THE DEBTOR’S VOTING AGENT, PRIME CLERK LLC, AT THE ADDRESS BELOW, OR BY TELEPHONE AT (844) 276-3030 (DOMESTIC TOLL-FREE) OR (917) 962-8891 (INTERNATIONAL). THE VOTING AGENT IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

<p><b>If by standard, overnight. or hand delivery:</b>  SIGA Ballot Processing  c/o Prime Clerk LLC  830 3rd Avenue, 3rd Floor  New York, New York 10022</p>
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<sup>8</sup> The Class of Equity Interests deemed to reject the Plan is Class 4 (Equity Interests).

**EXHIBIT D**

**CONFIRMATION HEARING NOTICE**

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

-----X  
:   
**In re** : **Chapter 11 Case No.**  
:   
**SIGA TECHNOLOGIES, INC.,** : **14-12623 (SHL)**  
:   
**Debtor.** :   
:   
-----X

**NOTICE OF (I) APPROVAL OF DISCLOSURE STATEMENT;  
(II) ESTABLISHMENT OF RECORD DATE; (III) HEARING ON CONFIRMATION  
OF THE PLAN AND PROCEDURES FOR OBJECTING TO CONFIRMATION  
OF THE PLAN; AND (IV) PROCEDURES AND DEADLINE FOR VOTING ON THE PLAN**

**TO PARTIES IN INTEREST IN SIGA TECHNOLOGIES, INC. CHAPTER 11 CASE:**

**PLEASE TAKE NOTICE that:**

1. **Approval of Disclosure Statement.** By Order dated [\_\_\_\_], 2016 (ECF No.[ ]) (the “**Order**”), the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) approved the Disclosure Statement for the Debtor’s Chapter 11 Plan (as it may be amended, the “**Disclosure Statement**”) filed by SIGA Technologies, Inc. (the “**Debtor**”). The Bankruptcy Court also authorized the Debtor to solicit votes from those parties entitled to vote with regard to the acceptance or rejection of the Debtor’s Chapter 11 Plan, dated December 15, 2015 (as it may be amended, the “**Plan**”), annexed as **Exhibit “A”** to the Disclosure Statement. Any capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Plan.

2. **Confirmation Hearing.** A hearing (the “**Confirmation Hearing**”) to consider the confirmation of the Plan will be held at [\_:\_.m.] (**Eastern Time**) on [\_\_\_\_], **2016**, before the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004. The Confirmation Hearing may be continued from time to time without further notice other than the announcement by the Debtor of the adjourned date(s) at the Confirmation Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Bankruptcy Court, and the Plan may be modified, if necessary, prior to, during, or as a result of the Confirmation Hearing, without further notice to interested parties.

3. **Record Date for Voting.** Only parties who are eligible to vote and hold Claims against the Debtor as of February 2, 2016 are entitled to vote on the Plan.

4. **Voting Deadline.** All votes to accept or reject the Plan must be actually received by the Debtor’s voting agent, Prime Clerk LLC (“**Prime Clerk**”), by no later than 4:00 p.m. on [\_\_\_\_], 2016 (the “**Voting Deadline**”). Any failure to follow the voting instructions included with your ballot may disqualify your ballot and your vote.

5. **Parties in Interest Not Entitled to Vote.** The following holders of Claims and Equity Interests are not entitled to vote on the Plan: (i) holders of unimpaired Claims, (ii) holders of



Equity Interests, or (iii) holders of Claims that are the subject of filed objections or requests for estimation. If you have timely filed a proof of Claim and disagree with the Debtor's classification of, objection to, or request for estimation of, your Claim and believe that you should be entitled to vote on the Plan, then you must serve on the Debtor at the address set forth below and file with the Bankruptcy Court (with a copy to chambers) a motion (a "**Rule 3018(a) Motion**") for an order pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") temporarily allowing such claim in a different amount or in a different class for purposes of voting to accept or reject the Plan.

6. All Rule 3018(a) Motions must be filed on or before the tenth (10th) day after the later of (i) service of this notice and (ii) service of notice of an objection or request for estimation, if any, as to such Claim. In accordance with Bankruptcy Rule 3018, as to any creditor filing a Rule 3018(a) Motion, such creditor's ballot will not be counted except as may be otherwise ordered by the Bankruptcy Court at least six (6) days prior to the Voting Deadline or as the Bankruptcy Court may direct. Creditors may contact Prime Clerk by calling (844) 276-3030 (domestic) or (917) 962-8891 (international) or emailing sigaballots@primeclerk.com to receive an appropriate ballot for any Claim for which a proof of Claim has been timely filed and a Rule 3018(a) Motion has been granted. Rule 3018(a) Motions that are not timely filed and served in the manner set forth above shall not be considered.

7. **Objections to Confirmation.** Responses and objections, if any, to confirmation of the Plan must:

- (a) Be in writing;
- (b) State the name and address of the objecting party and the amount and nature of the Claim or Equity Interest of such party;
- (c) Conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court;
- (d) State with particularity the basis and nature of any objection to confirmation of the Plan;
- (e) Be filed with the Bankruptcy Court either (i) *electronically* or (ii) *conventionally*, as noted below:
  - (i) *Electronic Filing*: the filer must be an attorney in possession of passwords and logins to both PACER and the Bankruptcy Court's Electronic Case Filing System; electronic filing must be in accordance with General Order M-399 (which can be found at <http://nysb.uscourts.gov>); or
  - (ii) *Conventional Filing*: the filer must send the response or objection by mail, courier, or messenger to the Bankruptcy Court's clerk at the following address: United States Bankruptcy Court, One Bowling Green, New York, NY 10004; the hard copy of the response or objection should be accompanied by a CD-ROM containing the response or objection in text-searchable portable document format (PDF);

[NOTE: *All filers* – those filing electronically as well as those filing conventionally – must provide Bankruptcy Court Chambers with a separate hard copy of the response or objection; any proposed order should be accompanied by a CD-ROM containing the response or objection in text-searchable portable document format (PDF)]; and

- (f) Be served in accordance with General Order M-399 so as to be received no later than [\_\_\_\_\_], 2016 at 4:00 p.m. (Eastern Time), and on the following parties:
- (i) The Debtor, c/o SIGA Technologies, Inc., 660 Madison Avenue, Suite 1700, New York, New York 10065 (Attn: Daniel J. Luckshire);
  - (ii) The attorneys for the Debtor, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Stephen Karotkin, Esq.);
  - (iii) The Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Richard C. Morrissey, Esq.); and
  - (iv) The attorneys for the statutory creditors' committee, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: Martin J. Bienenstock, Esq. and Scott K. Rutsky, Esq.).

**IF ANY OBJECTION OR RESPONSE TO CONFIRMATION OF THE PLAN IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO CONFIRMATION OF THE PLAN AND MAY NOT BE HEARD AT THE HEARING. REPLIES TO ANY SUCH OBJECTIONS AND RESPONSES MUST BE FILED AND SERVED BY NO LATER THAN [\_\_\_\_\_], 2016 AT 12:00 NOON (EASTERN TIME).**

8. **Parties Who Will Not Be Treated as Creditors.** Any holder of a Claim that (i) is scheduled in the Debtor's schedules of assets and liabilities at \$0.00, or in an unknown amount, or as disputed, contingent, or unliquidated, and is not the subject of a timely filed proof of Claim or a proof of Claim deemed timely filed with the Bankruptcy Court pursuant to either the Bankruptcy Code or any order of the Bankruptcy Court, or otherwise deemed timely filed under applicable law, or (ii) is not scheduled and is not the subject of a timely filed proof of Claim or a proof of Claim deemed timely filed with the Bankruptcy Court pursuant to either the Bankruptcy Code or any order of the Bankruptcy Court, or otherwise deemed timely filed under applicable law, shall not be treated as a creditor with respect to such Claim for purposes of voting on the Plan.

9. **Executory Contracts and Unexpired Leases.** Subject to the occurrence of the Effective Date under the Plan, all executory contracts and unexpired leases to which the Debtor is a party, and which have not expired by their own terms on or prior to the Confirmation Date, shall be deemed assumed, and, if applicable, assigned, except for an executory contract or unexpired lease that (a) has previously been assumed, assumed and assigned, or rejected pursuant to a Final Order of the Bankruptcy Court, (b) is specifically designated as a contract or unexpired lease to be rejected on the Schedule of Rejected Contracts and Leases in the Plan Supplement, (c) is the subject of a rejection motion filed by the Debtor under section 365 of the Bankruptcy Code prior to the Confirmation Date with respect to which there is not yet a Final Order of the Bankruptcy Court, or (d) is the subject of a pending Cure Dispute.

10. **Additional Information.** Any party in interest wishing to obtain information about the solicitation procedures or copies of the Disclosure Statement or the Plan should contact the Debtor's voting agent, Prime Clerk, at (844) 276-3030 (domestic) or (917) 962-8891 (international), sigaballots@primeclerk.com, or may view such documents by accessing the Debtor's website:

[cases.primeclerk.com/siga/](http://cases.primeclerk.com/siga/) or the Bankruptcy Court's website: <http://nysb.uscourts.gov>. As previously noted above, a PACER ([www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)) password and login are needed to access documents on the Bankruptcy Court's website (<http://nysb.uscourts.gov>). **PRIME CLERK IS NOT AUTHORIZED TO, AND WILL NOT, PROVIDE LEGAL ADVICE.**

Dated: New York, New York  
[\_\_\_\_], 2016

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor  
and Debtor in Possession*