

Adelphia Recovery Trust  
919 North Market Street  
Seventeenth Floor  
P.O. Box 8705  
Wilmington, DE 19899  
January 21, 2021

### INFORMATION FOR U.S. FEDERAL INCOME TAX PURPOSES

The ART is filing its final tax return for the short period ending October 31, 2020. This letter provides information relating to your share of income, gain, deductions, and loss ("Tax Items") of the Adelphia Recovery Trust (the "Trust") to be reported on your 2020 U.S. Federal and State income tax returns.

The Trust reports as a grantor trust for tax purposes and interest holders are considered grantors. This means that you are treated as recognizing an allocable portion of each Tax Item of the Trust as if you recognized such income, gain, deduction or loss directly.

Pursuant to the Plan and the Trust Declaration, the ART was dissolved on December 31, 2016 (the "Dissolution Date"). After the Dissolution Date, for purpose of liquidating and winding up the affairs of the ART, the Trustees will continue, pursuant to the Trust, to act until the Trustees' duties under the Trust have been fully performed. Pursuant to the October 7, 2020 ORDER AUTHORIZING (I) DEBTORS TO PAY OFF TOW NOTE, (II) DEBTORS TO PAY TRUST EXPENSES FOLLOWING FINAL LIQUIDATING DISTRIBUTION AND (III) CERTAIN PROCEDURES RELATING TO TRUST'S FINAL LIQUIDATING DISTRIBUTION AND FUTURE PLAN DISTRIBUTIONS, the final liquidating distribution occurred on October 30, 2020 and the ART is filing its final tax return for the short period ending October 31, 2020.

The Trust has items of income and expense, including interest income, trustee expenses, accounting and banking fees and professional fees that are being reported and that have been allocated by class of interest. The attached Tax Worksheet for Holders of CVV Interests by CUSIP shows the allocation of these Tax Items by class of interest and by month using the cash method of accounting. You may determine your share of the Tax Items by referring to the Tax Worksheet for the class of interest you hold. In general, if you acquired your interests before January 1, 2020, and did not dispose of any of them during 2020, you should calculate your share of the Trust Tax Items for the ten months of the short period ending October 31, 2020. If you acquired your interests after January 1, 2020, or if you disposed of any of them during 2020, you should calculate your share of Trust Tax Items for the portion of the ten months you held your interests. You should seek the advice of your advisor as the tax consequences to each holder depends on the particular circumstances of each holder including the date each holder acquired its interests in the Trust and the tax jurisdictions that apply to each holder. Information about the Trust Tax Items by class of interest held can be found on our website at: <http://www.adelphiarestructuring.com/RecoveryTrust.aspx>

In conjunction with the winding up of the Trust, the outstanding principal and accrued interest of the Tow Note was paid off in full for \$3.5 million and \$3.7 million, respectively, for a total cash payment of \$7.2 million on October 8, 2020. As a result, the Trust recognized interest income of \$3.7 million and wrote off its remaining basis in the Tow Note creating a loss on investment in litigation of \$2.1 million. This write-off has been allocated to each class of Interest. Refer to the Loss on Investment in Litigation Worksheet for Trust Interest Holders by CUSIP, located on our website at: <http://www.adelphiarestructuring.com/RecoveryTrust.aspx> for the allocation of the loss to each class of Interest. The Trust's holding period for the investment in the Tow Note was from the inception of the Trust in 2007 through the pay off on October 8, 2020. The circumstances that you and your tax advisor should consider are your own holding period which may differ from the Trust's holding period. You should seek the advice of your advisor as the tax consequences to each holder depends on the particular circumstances of each holder including the date each holder acquired its interests in the Trust and the tax jurisdictions that apply to each holder.

As noted above, on October 30, 2020 the ART made its final liquidating distribution of approximately \$6.7 million in cash payable to holders of interests in the Trust. There may be tax consequences to holders associated with this distribution. As a general matter, distributions from a grantor trust affect tax basis and are not otherwise taxable for U.S. federal income tax purposes. However, the tax consequences to each holder depend on the particular circumstances of each holder, including the circumstances in which each holder acquired its interest in the Trust and the tax jurisdictions that apply to each holder. Upon the completion of the final liquidating distribution, all remaining issued and outstanding

Adelphia Recovery Trust CVV Interests were cancelled. Information about this distribution can be found on our website at:  
[http://adelphiarestructuring.com/Documents/ImportantDocuments/2020/ART%20Distribution%20per%20Interest%20Chart\\_Final.pdf](http://adelphiarestructuring.com/Documents/ImportantDocuments/2020/ART%20Distribution%20per%20Interest%20Chart_Final.pdf)

THIS LETTER IS NOT INTENDED TO, AND DOES NOT, PROVIDE TAX ADVICE RELATING TO THE HOLDING OF INTERESTS. THIS LETTER DOES NOT ADDRESS ISSUES THAT MAY BE RELEVANT TO PARTICULAR CLASSES OF HOLDERS OF CVV INTERESTS (INCLUDING BUT NOT LIMITED TO SUBSEQUENT INTEREST HOLDERS). EACH HOLDER SHOULD SEEK TAX ADVICE BASED ON ITS PARTICULAR CIRCUMSTANCES FROM ITS OWN TAX ADVISOR. HOLDERS OF CVV INTERESTS ARE HEREBY NOTIFIED THAT ANY DISCUSSION OF TAX ISSUES CONTAINED OR REFERRED TO IN THIS LETTER IS NOT INTENDED OR WRITTEN TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF AVOIDING PENALTIES THAT MAY BE IMPOSED UNDER THE INTERNAL REVENUE CODE. THIS INFORMATION MAY NOT BE USED OR QUOTED IN WHOLE OR IN PART IN CONNECTION WITH ANY OFFERING OR SALE OF SECURITIES.