

This is the 2<sup>nd</sup>  
affidavit of Ivan  
Bobanovic in this  
proceeding and was  
made on  
14/MAR/2022

No. VLC-S-S-1913149  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

Between

KARL HAASE

Plaintiff

and

RELIQ HEALTH TECHNOLOGIES INC.,  
LISA CROSSLEY, AMAN THINDAL, GIANCARLO DE LIO,  
EUGENE BEUKMAN AND BRIAN STORSETH

Defendants

Brought under the *Class Proceedings Act*, RSBC 1996, c 50

**AFFIDAVIT #2 of IVAN BOBANOVIC**

I, Ivan Bobanovic of 1480 Richmond St. #204 London, Ontario, SWEAR THAT:

1. I am the Vice-President of RicePoint Administration Inc. (“**RicePoint**”).
2. I have knowledge of the matters I depose to herein. Where that knowledge is based on information I have obtained from others, I have indicated the source of that information and believe that information to be true.
3. For the purposes of swearing this affidavit, I have reviewed the Settlement Agreement and the schedules thereto, including the Plan of Notice and Distribution Protocol.

4. I understand that this affidavit will be used in support of the Plaintiff's application for, among other things:

- (a) approval of the Distribution Protocol and distribution of the Settlement Amount (\$2,500,000), less fees, disbursements, taxes, administration expenses and any other fee or expense approved by the Court ("**Net Settlement Amount**"), in accordance with the Distribution Protocol; and
- (b) approval of Second Notice (as that term is defined in the settlement agreement between the Plaintiff (on his own behalf and on behalf of the Class) and Reliq Health Technologies Inc., Lisa Crossley, Aman Thindal, Giancarlo De Lio, Eugene Beukman and Brian Storseth dated November 24, 2021 ("**Settlement Agreement**")).

5. In this affidavit, I record:

- (a) my opinion as to the efficacy of Second Notice;
- (b) my estimate of the costs of Second Notice;
- (c) an update on First Notice;
- (d) an update on the claims procedure;
- (e) my opinion that the Distribution Protocol will provide an effective and efficient manner to distribute the Net Settlement Amount; and
- (f) an update on opt out elections received as of the date this affidavit was made.

## **EXPERTISE AND PROPOSED APPOINTMENT AS ADMINISTRATOR**

### **Background on RicePoint**

6. RicePoint is a subsidiary of Computershare Limited, an Australian public company and global market leader in transfer agency and share registration, employee equity plans, mortgage serving, proxy solicitation and stakeholder communications. Computershare is well known for its expertise in high integrity data management, high volume transaction processing and reconciliations, payments, and stakeholder engagement.

7. RicePoint provides notice and administrative services for class action settlements in Canada. Its bilingual services include the design and implementation of notice plans, the processing of claims, acting as the escrow agent for settlement funds, calculating class member entitlements, distributing settlement funds, and finally, reporting to the court and counsel on select aspects of an administration.

8. Over approximately the last 19 years, RicePoint has administered over 90 settlements of varying size and complexity and distributed more than \$5 billion in settlement funds. Those settlements related to securities, price fixing, medical, consumer and employment matters.

### **My Expertise**

9. I have assisted and/or lead the design and implementation of legal notification campaigns.

Most recently I helped design notice plans for:

- (a) *Fanshawe v Toshiba Corporation et al.*, a price-fixing class action settlement of approximately \$75 million;

(b) *Yeoman v Cash Store Financial et al.*, a borrower class action settlement of \$10 million; and

(c) *Foster v Sears Canada Inc et al.*, a consumer class action settlement of \$7.5 million.

10. Under my management and/or direction, RicePoint deployed certification and/or settlement approval notice programs for the following securities class actions:

(a) *Marcantonio v TVI Pacific Inc.*;

(b) *OMERS & McCann v CP Ships Ltd., et al.*;

(c) *O'Neil v SunOpta Inc., et al.*;

(d) *Metzler v Gildan Activewear Inc., et al.*;

(e) *Devlin and Pathway Multi Series Fund Inc. v Canadian Superior Energy Inc. and Challenger Energy Corp., et al.*;

(f) *Wheeler v China National Petroleum Corp., et al.*;

(g) *Nor-Dor Developments Limited v Redline Communications Group Inc., et al.*;

(h) *McKenna v Gammon Gold Inc., et al.*;

(i) *Dobbie v Arctic Glacier Income Fund et al.*;

(j) *Sorensen v EasyHome Ltd., et al.*;

(k) *Leslie v Agnico Eagle Mines Ltd, et al.*;

- (l) *Zaniewicz v Zungui Haixi Corp., et al.*;
- (m) *Snelgrove v Cathay Forest Products Corp., et al.*;
- (n) *Philpott v Stonehaven Exploration Ltd. (formerly Donnybrook Energy Inc.), et al.*;
- (o) *Donohue v Baja Mining Corp., et al.*; and
- (p) *McDonald v Home Capital Group Inc., et al.*

11. Under my management and/or direction, RicePoint has administered, calculated class members' monetary entitlement and distributed money to class members in the following securities class action settlements:

- (a) *Marcantonio v TVI Pacific Inc.* (\$2.1 million);
- (b) *OMERS & McCann v CP Ships Ltd., et al.* (\$12.8 million);
- (c) *O'Neil v SunOpta Inc., et al.* (\$11.25 million USD);
- (d) *Metzler v Gildan Activewear Inc., et al.* (\$22.5 million USD);
- (e) *Douglas Devlin and Pathway Multi Series Fund Inc v Canadian Superior Energy Inc., and Challenger Energy Corp., et al.* (\$5.2 million USD);
- (f) *Wheeler v. China National Petroleum Corp., et al.* (\$9.99 million);
- (g) *Nor-Dor Developments Limited v Redline Communications Group Inc., et al.* (\$3.6 million);
- (h) *McKenna v Gammon Gold Inc., et al.* (\$13.25 million);

- (i) *Dobbie v Arctic Glacier Income Fund et al.* (\$13.75 million);
- (j) *Sorensen v EasyHome Ltd., et al.* (\$2.25 million);
- (k) *Zaniewicz v Zungui Haixi Corp., et al.* (\$10.85 million);
- (l) *Snelgrove v Cathay Forest Products Corp., et al.*;
- (m) *Philpott v Stonehaven Exploration Ltd. (formerly Donnybrook Energy Inc.), et al.* (\$5.5 million); and
- (n) *Donohue v Baja Mining Corp., et al.* (\$11 million).

12. Members of the RicePoint team responsible for the administration of this proposed securities class action settlement, including Kurt Elgie, have been responsible for the administration, calculation of class member entitlement and distribution of money in several other securities class action settlements, including:

- (a) *The Trustees of the Drywall Acoustic Lathing and Insulation Local 675 Pension Fund v SNC-Lavalin Group Inc. et al.* (\$110 million);
- (b) *AFA Livförsäkringsaktiebolag et al. v Agnico Eagle Mines Limited et al* (\$17 million);
- (c) *McDonald v Home Capital Group Inc., et al.* (\$29.5 million);
- (d) *Gérald Léveillé v Avantage Link Inc. (Jitec Inc.), et al.* (\$9.85 million);
- (e) *Paul Carter, F. Philip Wilhelmsen v. Asia Packaging Group Inc., et al.* (\$1.39 million);

- (f) *R. Charles Allen v Aspen Group Resources Corporation, et al.* (\$3.285 million);
- (g) *The Trustees of the Labourers' Pension Fund of Central and Eastern Canada, et al. v Ernst & Young LLP re Sino-Forest* (\$117 million);
- (h) *The Trustees of the Labourers' Pension Fund of Central and Eastern Canada, et al. v Credit Suisse Securities Canada, et al. re Sino-Forest* (\$32.5 million);
- (i) *The Trustees of the Labourers' Pension Fund of Central and Eastern Canada, et al. v BDO Limited re Sino-Forest* (\$8.774 million); and
- (j) *The Trustees of the Labourers' Pension Fund of Central and Eastern Canada, et al. v w Judson Martin, et al. re Sino-Forest* (\$75 million).

13. In forming the opinion expressed below, I draw from my class action administration experience, as well as my educational experience. I have an Honors Specialization Bachelor of Arts Degree from Western University. I have been with RicePoint for 12 years: six years in a variety of roles managing notice and administration campaigns, four years as Director of Operations, and two years as Vice-President.

**RicePoint's Appointment as Administrator and the Plaintiff's first application**

14. On December 8, 2021, I attended a hearing for the Plaintiff's application for:
- (a) consent certification for settlement approval purposes;
  - (b) approval of opt-out procedures;
  - (c) approval of a claims procedure;

- (d) approval of the procedure for Class Members to file objections or comments on the Settlement Agreement and Class Counsel fees and disbursements;
- (e) RicePoint's appointment as administrator; and
- (f) approval of First Notice.

15. I understand from my attendance at the hearing and from Garrett Hunter, an associate lawyer at Siskinds LLP ("Siskinds"), that the application was granted, including RicePoint's appointment as administrator, approval of First Notice and approval of the claims procedure.

#### **THE PLAN OF NOTICE**

##### **First Notice**

16. I have reviewed the Plaintiff's proposed Plan of Notice. From that, I understand the various proposed mediums of publication and methods of distributing First Notice and Second Notice.

17. I believe, based on the actions taken by RicePoint and the steps Garrett Hunter has told me that Siskinds has undertaken, that First Notice has been or will be disseminated in accordance with the Plan of Notice.

18. RicePoint has taken the following actions to facilitate the dissemination of First Notice in accordance with the Plan of Notice:

- (a) arranged for the publication of short-form First Notice in the national weekend edition of *The Globe and Mail* in English and in *La Presse* in French. That publication occurred on Saturday, January 22, 2022;
- (b) arranged for the issuance of a news release, in English in French, across *Canada Newswire*, which occurred on January 24, 2022;



- (c) arranged for publication of the short-form First Notice in English and French on Institutional Shareholder Services Inc., which occurred on January 24, 2022;
- (d) starting on January 24, 2022 RicePoint sent a notice package (consisting of a short-form First Notice and cover letter) to the Canadian brokerage firms in its proprietary database. To date 1 Canadian brokerage firm has requested copies of the short-form First Notice to send to Class Members and 2 Canadian brokerage firms have sent us a list of Class Members to whom RicePoint will directly send the short-form First Notice. In my experience, it is typical for brokerage firms to delay requests until closer to the claims filing deadline. I, therefore, expect that the bulk of the requests from Canadian brokerage firms will occur closer to the claim filing deadline of July 21, 2022; and
- (e) starting on January 24, 2022, RicePoint sent the short-form First Notice to all persons who acquired Reliq securities in the private placement offering completed on or around January 9, 2018 in the list provided by the Defendants.

19. RicePoint's website related to this action, which can be found at <https://reliqclassaction.com/>, went live on January 22, 2022. That website contains all items relevant to First Notice as well as the Claim Form and an online portal for Class Members to make claims to participate in settlement benefits.

20. I understand from Garrett Hunter of Siskinds that:

- (a) on January 22, 2022, the long-form First Notice was published in English and French on Class Counsel's website: <https://www.siskinds.com/class-action/reliq-health-technologies-inc/>;
- (b) on January 24, 2022, the Settlement Agreement was posted on Class Counsel's website; and
- (c) starting on January 24, 2022, the long-form First notice was mailed, electronically and/or physically, to those persons and entities who have previously contacted Class Counsel for the purposes of receiving notice of developments in the Action.

21. I further understand from Garrett Hunter of Siskinds that on or before March 15, 2022, which is 30 days prior to the application to approve the matters referred to at paragraph 4, Siskinds will post the following on its website:

- (a) a short summary of the rationale for the Settlement;
- (b) the affidavits in support of the application for approval of the Settlement; and
- (c) the affidavits in support of the application for approval of Class Counsel fees and disbursements.

22. In my view, First Notice was effective in bringing relevant matters to the attention of Class Members given the extensive direct outreach that occurred and is occurring (e.g. broker outreach and direct mailing to Private Placement Class Members whose information was on the list provided by the Defendants), which was supplemented by the indirect notice.

23. The cost to disseminate First Notice has been approximately \$16,500 to date (excluding applicable taxes). This figure does not include the notice packages requested by Canadian brokerages. I anticipate that the total costs once all brokerage expenses are incurred will be approximately \$25,000, excluding applicable taxes, which is consistent with our initial estimate. I note that this figure could be more or less depending on the total number of notice packages being requested and the percentage of those packages that can be delivered electronically.

#### **Estimated Cost to Disseminate Second Notice**

24. It is my estimate that the cost to execute Second Notice will be approximately \$3,130, excluding applicable taxes. Below I have provided a breakdown of the estimated costs of the key components of Second Notice:

- (a) publication of the short-form Second Notice across *Canada Newswire*: approximately \$2,630;
- (b) publication through Institutional Shareholder Services Inc: \$500; and
- (c) there may also be ancillary costs associated with Second Notice, including French language translations of the short-form and long-form Second Notice.

#### **Efficacy of Second Notice**

25. Second Notice will notify Class Members of the outcome of the hearing scheduled for April 14, 2022 and remind them of the ongoing claims procedure. Unlike First Notice, the Second Notice will not inform Class Members of any new information that requires them to take steps to protect their rights.

26. As set out in the Plan of Notice, Second Notice will be disseminated as follows:
- (a) English and French language versions of the short-form Second Notice will be issued (with necessary formatting modifications) across *Canada Newswire*, a major business newswire in Canada;
  - (b) English and French language versions of the short-form Second Notice will be sent to Institutional Shareholder Services Inc. (ISS) for publication through their platform;
  - (c) electronic publication of the long-form Second Notice will occur in English and French on Class Counsel's website;
  - (d) Class Counsel shall mail or email the long-form Second Notice to those persons that have contacted them as of the publication date regarding this litigation and have provided them with their contact information; and
  - (e) Class Counsel shall make a toll-free number and email address available to the public that will enable Class Members to obtain more information about the Settlement Agreement and to request that a copy of the long-form Second Notice be sent electronically or physically to them directly.
27. It is my view that Second Notice, combined with the notice that has already been provided through First Notice, is an effective means of bringing the Settlement Agreement and the claims procedure to the attention of Class Members.

## **THE CLAIMS PROCEDURE**

28. RicePoint has prepared a Claim Form, in electronic and paper format, for Class Members to make claims to participate in settlement benefits. The Claim Form is available on <https://reliqclassaction.com/>. A claim can also be made through an online portal available on that same website. The online portal replicates the content and information requests in the paper Claim Form. A copy of the Claim Form is attached hereto as **Exhibit "A"**.

29. The claims procedure commenced concurrently with the first publication of First Notice on January 22, 2022. Class Members have until July 21, 2022 to submit a claim to participate in settlement benefits, which is one hundred and eight (180) days from the date First Notice was first published on January 22, 2022.

30. To date we have received approximately 40 claims. It is my experience that the bulk of the claims in securities class action administrations are submitted closer to the claims deadline. I anticipate that most Class Members will submit their claims starting in late May and early June 2022.

## **DISTRIBUTION PROTOCOL**

31. I have reviewed the proposed Distribution Protocol and consulted with Garrett Hunter and Anthony O'Brien of Siskinds on the content of the Distribution Protocol.

32. The Distribution Protocol, if implemented, will distribute the Net Settlement Amount to Class Members in a manner that is similar to other securities class actions that RicePoint has administered. Based on my experience, it is my view that the Distribution Protocol will provide an efficient and effective methodology for distributing the Net Settlement Amount to Class Members. The Claim Form, designed by RicePoint and approved in the first application, will gather all

necessary information for RicePoint to do the calculations prescribed by the Distribution Protocol. RicePoint has significant experience and expertise doing these types of calculations. The Distribution Protocol has flexible proof of transaction requirements that will allow legitimate claims to be successfully made while providing reasonable assurance that illegitimate claims will be rejected.

33. I anticipate, subject to the occurrence of unforeseen events, that the first distribution of settlement funds to Class Members will occur by June 2023 and a residual distribution (if any) will be made sometime thereafter.

**OPT OUT ELECTIONS**

34. To date no class member has submitted an opt out election.

35. The deadline to file an opt out election is March 23, 2022. I will provide Garrett Hunter of Siskinds with an update on any opt out elections received shortly after March 23, 2022. I understand, from Mr. Hunter, that if there are any opt out elections received, the Court will be provided with the details of those opt out elections prior to the April 14, 2022 hearing.

SWORN BEFORE ME in the )  
 City of London in the )  
 Province of Ontario )  
 this 14<sup>th</sup> day of March, 2022 )  
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 A Commissioner for Taking Affidavits  
 in the Province of Ontario

  
 Ivan Bobanovic

**Garrett Hunter**  
 275 Dundas Street  
 London, ON N6B 3L1

This is Exhibit "A" mentioned and referred to in the 2<sup>nd</sup> Affidavit of Ivan Bobanovic SWORN before me at the City of London, in the Province of Ontario, this 14th day of March, 2022.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

A Commissioner for Taking Affidavits in  
the Province of Ontario

## RELIQ HEALTH TECHNOLOGIES INC.

Supreme Court of British Columbia, Court File No. VLC-S-S-1913149

### CLAIM FORM

#### I. GENERAL INSTRUCTIONS – PLEASE READ CAREFULLY

1. This Claim Form is directed to the following Class or Class Members: all persons and entities, wherever they may reside or be domiciled, who acquired Private Placement Units in Reliq's private placement of 8,928,571 Private Placement Units at a price of \$1.12 per Private Placement Unit that closed on or around January 9, 2018; and all persons and entities, wherever they may reside or be domiciled, who acquired Reliq securities during the period from and including February 23, 2018 to and including October 15, 2018.
2. If you are NOT a member of the Class, as defined below, PLEASE DO NOT submit a Claim Form.
3. To make a claim for compensation from the settlement in the above-noted action, you must complete and, on page 5, sign the Claim Form. If you fail to file a properly addressed Claim Form, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Funds created in connection with the Settlement.
4. A separate Claim Form must be filed for each account in which common shares of Reliq Health Technologies Inc. ("Reliq") were held.
5. Only your Reliq common shares acquired during the Class Period are eligible to potentially recover under the Settlement. However, because your sales or unsold shares held up to the time of your claim will be used for purposes of calculating your Notional Entitlement Net Loss under the Distribution Protocol, information about acquisitions of Reliq common shares after the Class Period, if any, is required for claim balancing. While such post Class Period acquisitions will not be used for purposes of calculating your Notional Entitlement Net Loss pursuant to the Distribution Protocol, the information is necessary in order to properly process your claim.
6. Submission of a Claim Form does not assure that you will share in the Net Settlement Funds.
7. Before submitting a Claim Form, Claimants may wish to consult a sample completed Claim Form, available at [www.reliqclassaction.com](http://www.reliqclassaction.com).
8. For questions about this Claim Form, or if you require assistance, please contact the Claims Administrator, RicePoint Administration Inc., at 1-888-846-6722 or [reliq@ricepoint.com](mailto:reliq@ricepoint.com).
9. MAIL YOUR COMPLETED AND SIGNED CLAIM FORM POSTMARKED ON OR BEFORE **July 21, 2022**, ADDRESSED TO THE ADMINISTRATOR:

**Reliq Health Technologies Inc.  
c/o RicePoint Administration Inc.  
P.O. Box 4454, Toronto Station A  
25 The Esplanade, Toronto, ON M5W 4B1**

#### II. KEY DEFINITIONS

1. "Action" means the action filed in the Supreme Court of British Columbia styled *Haase v. Reliq Health Technologies Inc., et al.* (Court File No. VLC-S-S-1913149).
2. "Defendants" means Reliq, Lisa Crossey, Aman Thindal, Giancarlo De Lio, Eugene Beukman and Brian Storseth.
3. "Eligible Securities" means Reliq securities, the acquisition of which makes a person a Class Member or, in the case of an Opt Out Party, Reliq securities, the acquisition of which would have made the person a Class Member if he, she or it had not excluded himself, herself or itself from the Class in accordance with the terms of the First Order and the First Notice.
4. "Excluded Persons" means:
  - (a) the Defendants;
  - (b) Reliq's past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns;



- (c) any member of the families of Lisa Crossley, Aman Thindal, Giancarlo De Lio, Eugene Beukman or Brian Storseth; and
  - (d) the Underwriters and their past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns.
5. "Opt-Out Party" means a person who would otherwise be a Class Member but who opts out of the Action pursuant to the Court approved opt out process.

### III. CLAIMANT IDENTIFICATION

1. Use Part I of this form entitled "Claimant Identification" to identify each purchaser of the Reliq common shares that are the subject of this claim. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASERS.**

### IV. CLAIM FORM

1. Claim Forms must be submitted to the Administrator (see contact details on the first page of these instructions).
2. A separate Claim Form must be filed for each account in which Eligible Shares were held.
3. A claimant must provide all of the requested information with respect to **all** of his, her or its:
- (a) Reliq common shares held January 8, 2018
  - (b) Reliq common shares acquired between and including January 9, 2018 to October 15, 2018 in the January 9, 2018 Private Placement or in the secondary market
  - (c) Reliq common shares acquired via the secondary market October 16, 2018 to the date you are filing your claim form
  - (d) Reliq common shares acquired through the exercise or conversion of a Reliq common share purchase warrant from January 9, 2018 to the date you are filing your claim form
  - (e) Reliq common shares sold/disposed of during the period from January 9, 2018 to and including the date you are filing your claim form
  - (f) Number of common shares held at the time the claim form is filed

Failure to report all required details may result in the rejection of a claimant's claim.

4. Please list each transaction in the Class Period separately and in chronological order, by trade date (not settlement date), beginning with the earliest. Claimants must accurately provide the month, day and year of each transaction listed.
5. Trade confirmations, broker statements or suitable alternative documentation evidencing a claimant's transactions in Reliq securities shares must be submitted with the Claim Form. Failure to submit supporting documentation acceptable to the Administrator may result in the rejection of your claim.
6. The information required by the Administrator is the minimum amount of information necessary to process the claims. The Administrator may request additional information as required to efficiently and reliably calculate claimants' losses. In some cases, where the Administrator cannot perform compensation calculations accurately or at a reasonable cost to the Class with the information provided by a claimant, the Administrator may conditionally accept the claim pending receipt of additional information.
7. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in an electronic aggregate file. If you wish to file an electronic file batch claim, you must contact the Administrator at [institutions@ricepoint.com](mailto:institutions@ricepoint.com).

Official  
Office  
Use  
Only

Reliq Health Technologies Inc.  
Supreme Court of British Columbia  
Court File No. VLC-S-S-1913149

Must Be Postmarked No Later  
Than July 21, 2022

**RHQ**

**CLAIM FORM**

Please Type or Print in the Boxes Below  
Do NOT use Red Ink, Pencil, or Staples

**PART I: CLAIMANT IDENTIFICATION**

Payee Name (as you would like the name(s) to appear on the cheque, if eligible for payment):

Payee Name (cont'd)

Payee Name (cont'd)

Telephone Number (Primary Daytime)

Telephone Number (Alternate)

Email Address

**MAILING INFORMATION**

Address

Address

City

Province

Postal Code

Foreign Province

Foreign Postal Code

Foreign Country Name/Abbreviation

FOR CLAIMS  
PROCESSING  
ONLY

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FOR CLAIMS  
PROCESSING  
ONLY





E. Reliq common shares sold/disposed of during the period from and including January 9, 2018 to and including the date of the Claim Form:

SALES						Total Sales Price (Excluding Commissions). <i>Please round off to the nearest whole dollar</i>		Proof of Sales Enclosed?
Trade Date(s) of Shares (List Chronologically)			Number of Shares Sold					
M	M	D	D	Y	Y			
1.		/		/		\$		00 <input type="radio"/> Y
								<input type="radio"/> N
2.		/		/		\$		00 <input type="radio"/> Y
								<input type="radio"/> N
3.		/		/		\$		00 <input type="radio"/> Y
								<input type="radio"/> N
4.		/		/		\$		00 <input type="radio"/> Y
								<input type="radio"/> N

F. Number of common shares held at the time the Claim Form is filed:  Proof Enclosed?  Y  N

**PART III. Declaration**

I (we) declare that the information on this Claim Form is true, correct and complete to the best of my (our) knowledge, information and belief.

I (we) declare that I (we) have disclosed all of my (our) holdings and purchase and sales transactions in Shares for the time periods required by this Claim Form.

I (we) also declare that I (we) am (are) not an Excluded Person(s) or Opt-Out Party as these terms are defined in the General Instructions.

I (we) acknowledge and agree that the Claims Administrator may disclose all information relating to my (our) claim to the Courts and counsel to the parties in the Actions, as may be necessary.

Executed this \_\_\_\_\_ day of \_\_\_\_\_ in \_\_\_\_\_  
(Month/Year) (City/State/Province/Country)

\_\_\_\_\_  
(Sign your name here)

\_\_\_\_\_  
(Sign your name here)

\_\_\_\_\_  
(Type or print your name here)

\_\_\_\_\_  
(Type or print your name here)

\_\_\_\_\_  
(Capacity of person(s) signing, e.g., Claimant)  
Proof of Authority to File Enclosed?  Yes  No

\_\_\_\_\_  
(Capacity of person(s) signing, e.g., Claimant)  
Proof of Authority to File Enclosed?  Yes  No

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.  
THANK YOU FOR YOUR PATIENCE.**



Reminder Checklist:

1. Please sign the above declaration.
2. Remember to attach supporting documentation, if available.
3. Do not send original share certificates; we may not be able to send them back.
4. Keep a copy of your Claim Form and all supporting documentation for your records.
5. The Claims Administrator will acknowledge receipt of your Claim Form by mail or email within 60 days. Your Claim Form is not deemed fully filed until you receive an acknowledgment postcard. If you do not receive an acknowledgment postcard within 60 days, please call the Claims Administrator toll-free at 1-888-846-6722.
6. If you move, you are required to send the Claims Administrator your new address. Failure to notify the Claims Administrator of a new address may result in your settlement benefits not being received by you.

**Privacy Statement**

All personal information provided by or on behalf of the Claimant to the Claims Administrator will be handled in accordance with applicable privacy laws and the Claims Administrator's privacy policies available at [www.ricepoint.com](http://www.ricepoint.com). Such information will be used for the purposes of administering the Settlement Agreement, including evaluation by the Claims Administrator, Class Counsel, Defense Counsel, and the Referee jointly approved by the parties, of the Claimant's eligibility for compensation under the Settlement Agreement. Personal information provided by the Claimant will not be disclosed without further express written consent of the Claimant, except to Class Counsel, Defense Counsel, and the Referee jointly approved by the parties; to appropriate persons to the extent necessary to process claims or provide benefits under the Settlement Agreement; as otherwise expressly provided in the Settlement Agreement; pursuant to court order, or as otherwise permitted or required by law; as may be reasonably necessary in order to enforce, or for Class Counsel or Defense Counsel to exercise their respective rights (including appeal rights) under the Settlement Agreement; or to the immediate family members, counsel, accountants and/or financial advisors of the Claimant (each of whom the Claimant shall instruct to maintain and honour the confidentiality of such information).

