## SECOND NOTICE PROGRAM

## Denis Gauthier v. David Baazov District of Montréal, No. 500-06-000859-179

## Notice shall be disseminated as follows:

- 1. by the Administrator disseminating the court-approved second press release ("Second Press Release") in English and French on PR Newswire for global distribution.
- 2. by the Administrator publishing the Second Press Release once in French in a weekday tablet (online) edition of La Presse+.
- 3. by the Administrator publishing the Second Press Release once in English in a weekday edition of The National Post, Financial Post section and the journal de Montreal.
- 4. by Class Counsel posting the court-approved second notice ("Second Notice") in English and French on its websites at <a href="https://www.faguyco.com/class-actions/baazov">https://www.faguyco.com/class-actions/baazov</a> and <a href="https://bergermontague.ca/cases/david-baazov/">https://bergermontague.ca/cases/david-baazov/</a>.
- 5. by Class Counsel emailing the Second Notice once in English and French to anyone who registered with Class Counsel to receive updates on the status of the Class Action, to the extent that Class Counsel has their email address.
- 6. by the Administrator posting the Second Notice in English and French on its website at a web address to be dedicated to the Administration.
- 7. by the Administrator sending the Second Notice in English and French via registered mail to the brokers identified in the priorly approved Brokers list (the "Brokers") requesting that, within fourteen (14) business days of receipt of the Second Notice the Broker forward copies of the Second Notice to all persons or entities for whose benefit the Broker purchased or otherwise acquired shares of Amaya during the period of February 2, 2016 to November 21, 2016 (the "Beneficial Owners"). For those Beneficial Owners whose email addresses are known to the Broker, the Broker may forward the Notice by email. Where the Broker does not have a valid email address for one or more Beneficial Owners, the Broker may request from aya@velvetpayments.com sufficient copies of the Second Notice to mail to all such Beneficial Owners whose email addresses are not known to them. The Brokers who elect to send the Second Notice to their Beneficial Owners shall send a statement to aya@velvetpayments.com confirming that the mailing, by email or regular mail was made and shall retain their mailing records for use in connection with any further notices that may be provided in the Action. Upon full compliance with this provision, the Brokers may seek reimbursement of their reasonable expenses actually incurred and combined with this Order by providing aya@velvetpayments.com with proper documentation supporting the expenses for

which reimbursement is sought, provided that the Brokers may only cumulatively request up to \$15,000 CAD in total for the expenses relating to the distribution of the Second Notice to Class Members. If the amounts submitted in aggregate exceed \$15,000 CAD, each Broker's claim shall be reduced on a *pro rata* basis. Each brokerage firm must submit its account within 30 days of incurring the expense to be entitled to a *pro rata* payment.