

500-06-000785-168

**Schedule 2 A**

# NOTICE OF THE SETTLEMENT OF THE STARS GROUP INC. (FORMERLY AMAYA) SECURITIES CLASS ACTION

**Read this notice carefully as it may affect your rights.**

This notice is directed to all persons and entities, excluding certain persons associated with the Defendants, who acquired securities of THE STARS GROUP INC. between March 31, 2014 to March 22, 2016 (collectively, the "Class" or "Class Members").

On March 24, 2016, a proposed class action was commenced against The Stars Group Inc. ("TSGI") and others in the Superior Court of Québec ("Class Action"). The authorized common issue in the Class Action is: Did the Defendants make misrepresentations and omissions of material fact in TSGI's public filings and statements regarding its business practices?

The settlement of the Class Action ("Agreement"), without any admission of liability on the part of the Defendants, was approved by the Honourable Justice Suzanne Courchesne of the Superior Court on •, 2020. This notice does not mean that the Superior Court has found liability or a likelihood of recovery on the part of any Class member. In fact, the Defendants have denied and continue to deny each and all of the claims and allegations of wrongdoing made by the Plaintiff in the Class Action. This notice provides a summary of the Agreement.

## SUMMARY OF THE SETTLEMENT TERMS

An amount of CDN \$30 million will be paid ("**Settlement Amount**"), which shall definitively and permanently resolve, settle and release and discharge all claims asserted, or which could have been asserted, against the Defendants by the Plaintiff on his own behalf and/or on behalf of the Class.

The Settlement Amount for the Class, less the lawyers' fees and disbursements, administrator's expenses, and taxes, will be distributed to the Class on a *pro rata* basis in accordance with the Court-approved plan of allocation. Distributions to Québec Class Members will be subject to the levy for the "Fonds d'aide aux actions collectives". Legal fees have been approved in the amount of twenty-five (25) percent of the Settlement Amount, plus disbursements, plus taxes. The Agreement and the Plan of Allocation may be viewed at <http://faguyco.com/en/portfolio/amaya-class-action/> and [amayasecuritiessettlementcanada.ca](http://amayasecuritiessettlementcanada.ca).

## A CLAIM FOR COMPENSATION MUST BE MADE BY •

**Each Class Member must submit a completed claim form on or before** hundred twenty (120) days after the date on which this Second Notice is last published, **in order to participate in the settlement. The claim form can be accessed or downloaded at** [amayasecuritiessettlementcanada.com](http://amayasecuritiessettlementcanada.com) **or obtained by calling the Administrator at 1-(877)-400-1211 or by email at** [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca).

Class Members are required to complete the Claim Form and upload the supporting documentation in the online claims administration portal at [amayasecuritiessettlementcanada.com/portal](http://amayasecuritiessettlementcanada.com/portal).

**If you do not submit a completed claim form by •, 2020, you will not receive any part of the net Settlement Amount.**

The Superior Court has appointed Trilogy Class Action Services as the Administrator of the settlement to among other things: (i) receive and process claim forms; (ii) decide eligibility for compensation; and (iii) distribute the net Settlement Amount to eligible Class Members. You may submit a paper claim form only if you do not have Internet access. The paper claim form may be sent by mail or courier to:

**Administrator, The Stars Group Inc./Amaya Securities Class Action**

**Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211  
Email : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)**

**Claims Administration Portal Registration: [Amayasecuritiessettlementcanada.com/portal](http://Amayasecuritiessettlementcanada.com/portal) (French and English)**

500-06-000785-168

**Schedule 2 B**

# NOTICE OF THE SETTLEMENT OF THE STARS GROUP INC. (FORMERLY AMAYA) SECURITIES CLASS ACTION

Read this Notice carefully as it may affect your legal rights

This notice is directed to all persons and entities, excluding certain persons associated with the Defendants, who acquired securities of THE STARS GROUP INC. ("TSGI") between March 31, 2014 and March 22, 2016 (collectively, the "Class" or "Class Members").

**IF YOU ARE A CLASS MEMBER IN THE CLASS ACTION, PLEASE READ THE FOLLOWING CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.**

On March 24, 2016, a proposed class action was commenced against TSGI and others in the Superior Court of Quebec ("Class Action"). The authorized common issue in the Class Action is: Did the Defendants make misrepresentations and omissions of material fact in TSGI's public filings and statements regarding its business practices?

The settlement of the Class Action ("**Agreement**"), without any admission of liability on the part of the Defendants, was approved by the Honourable Justice Suzanne Courchesne of the Superior Court on □, 2020. The Defendants have denied and continue to deny each and all of the claims and allegations of wrongdoing made by the Plaintiff in the Class Action. This notice provides a summary of the Agreement.

## THE AUTHORIZATION JUDGMENT

On January 21, 2020, the Honourable Justice Suzanne Courchesne of the Superior Court of Québec authorized the bringing of the Class Action in Court File No. 500-06-000785-168 for settlement purposes only.

*Pierre Derome*

v.

*The Stars Group Inc. et al.*

The Class is defined as follows:

- i) "**Primary Market Sub-Class**": all persons and entities, wherever they may reside or may be domiciled, other than Excluded Persons, who, during the Class Period, purchased TSGI's securities in an Offering and held all or some of those securities until at least March 23, 2016;
- ii) "**Secondary Market Sub-Class**": all persons and entities, wherever they may reside or may be domiciled, other than Excluded Persons, who, during the Class Period, purchased TSGI's securities in the secondary market and held all or some of those securities until at least March 23, 2016, and who:
  - are residents in Canada or were residents in Canada at the time of such acquisitions regardless of the location of the exchange on which they acquired TSGI's securities; or
  - acquired TSGI's securities in the secondary market in Canada or elsewhere, other than in the United States;

You are automatically a Class Member if you meet the description above. However, the Defendants, members of the immediate families of David Baazov, Daniel Y. Sebag, Divyesh Gadhia, Harlan W. Goodson and Wesley K. Clark, and the directors, officers, subsidiaries and affiliates of TSGI and its subsidiaries **are excluded from the Class**.

## THE NATURE OF THE CLAIMS ASSERTED

The Plaintiff commenced the Class Action alleging, essentially, misrepresentations of material facts relating to business practices and public filings and statements.

The Defendants contest the allegations in the Class Action. This Notice does not mean that the Court has found liability or a likelihood of recovery on the part of any Class Member. The Defendants have denied and continue to deny each and all of the claims and allegations of wrongdoing made by the Plaintiff in the Class Action.

The authorized causes of action for the purposes of settlement are:

- i) a statutory primary market claim for misrepresentations pertaining to public offerings under art. 217 *et seq.* of the Québec *Securities Act*, CQLR C V-1.1, as amended (the "QSA");
- ii) a statutory secondary market claim for misstatements and omissions of material facts under art. 225.4 *et seq.* of the QSA; and
- iii) a civil law claim under art. 1457 of the *Civil Code of Québec*.

#### SUMMARY OF THE SETTLEMENT TERMS

An amount of CDN \$30 million will be paid ("**Settlement Amount**"), which shall definitively and permanently resolve, settle and release and discharge all claims asserted, or which could have been asserted, against the Defendants by the Plaintiff on his own behalf and/or on behalf of the Class. The Settlement Amount for the Class, less the lawyers' fees and disbursements, administrator's expenses, and taxes, will be distributed to the Class on a pro rata basis in accordance with the Court-approved Plan of Allocation. Distributions to Québec Class Members will be subject to the levy for the "*Fonds d'aide aux actions collectives*". The Agreement and the Plan of Allocation may be viewed at <http://faguyco.com/en/portfolio/amaya-class-action/> and [www.amayasecuritiessettlementcanada.com](http://www.amayasecuritiessettlementcanada.com).

#### LAWYERS' FEES, DISBURSEMENTS AND TAXES

Legal fees have been approved by the Superior Court in the amount of twenty-five (25) percent of the Settlement Amount, plus disbursements, plus taxes.

#### CLAIM FOR COMPENSATION

Each Class Member must submit a completed claim form on or before hundred twenty (120) days after the date on which this Second Notice is last published, in order to participate in the settlement. The claim form can be accessed or downloaded at [amayasecuritiessettlementcanada.com](http://amayasecuritiessettlementcanada.com) or obtained by calling the Administrator at, 1-(877)-400-1211 or by email at [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca).

**Class Members are required to complete the Claim Form and upload the supporting documentation in the online claims administration portal at [amayasecuritiessettlementcanada.com/portal](http://amayasecuritiessettlementcanada.com/portal).**

If you do not submit a completed claim form by , 2020, you will not receive any part of the net Settlement Amount.

The Superior Court has appointed Trilogy Class Action Services as the Administrator of the settlement to among other things: (i) receive and process claim forms; (ii) decide eligibility for compensation; and (iii) distribute the net Settlement Amount to eligible Class Members. You may submit a paper claim form only if you do not have Internet access. The paper claim form may be sent by mail or courier to:

**Administrator, The Stars Group Inc./Amaya Securities Class Action**

**Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211**

**Email : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)**

Claims Administration Portal Registration:  
[Amayasecuritiessettlementcanada.com/portal](http://Amayasecuritiessettlementcanada.com/portal)  
(French and English)

## ADDITIONAL INFORMATION

This Notice has been approved by the Superior Court of Québec. The Judgment of the Court and other information in both languages are available on Class Counsel's website at <http://faguyco.com/portfolio-amaya-class-action> and/or [www.amayasecuritiessettlementcanada.com](http://www.amayasecuritiessettlementcanada.com).

Questions relating to the Class Action may be directed to Class Counsel:

Shawn Faguy  
Faguy & Co.  
329 de la Commune St. W., Suite 200  
Montréal, Quebec, Canada H2Y 2E1  
Tel: 514-285-8100 ext. 225  
Email: [classactions@faguyco.com](mailto:classactions@faguyco.com)

or

Eli Karp  
Morganti & Co., P.C.  
21 St Clair Ave, Ste 1102  
Tel : 647-344-1900 x2  
Toronto, Ontario M4T 1L9  
Email : [ekarp@morgantico.com](mailto:ekarp@morgantico.com)

**Note that the Court offices cannot answer any questions about the matters in this Notice.**

## NOTICE TO BROKERAGE FIRMS

Please deliver this Notice by email to your clients who purchased TSGI's securities during the Class Period and for whom you have or can obtain valid email addresses. If you have clients who purchased these securities during the Class Period for whom you do not have or cannot obtain valid email addresses, please contact Trilogy Class Action Services to obtain hard copies of this Notice for the purpose of mailing (by regular mail) the Notice to those clients.

Trilogy Class Action Services  
Amaya Securities Class Action Settlement  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211  
Email : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)

***The publication of this Notice was authorized by the Superior Court of Québec. Questions about matters in this notice should NOT be directed to the Superior Court***

500-06-000785-168

**Schedule 2 C**

# AVIS DE RÈGLEMENT DE L'ACTION COLLECTIVE EN VALEURS MOBILIÈRES DE STARS GROUP INC. (ANCIENNEMENT AMAYA)

**Veillez lire attentivement : ce qui suit pourrait affecter vos droits.**

Cet avis vise toute personne et entité, à l'exclusion de certaines personnes liées aux Défendeurs, qui ont acquis des valeurs mobilières de THE STARS GROUP INC., entre le 31 mars 2014 et le 22 mars 2016 (collectivement, le « groupe » ou les « membres du groupe »).

Le 24 mars 2016, une action collective proposée a été instituée à l'encontre de The Stars Group Inc. (« TSGI ») et d'autres, auprès de la Cour Supérieure du Québec (« **action collective** »). La question commune est définie comme suit: Les défendeurs ont-ils fait de fausses déclarations et omissions de faits importants dans les documents et déclarations publics de TSGI concernant ses pratiques commerciales?

Le règlement de l'action collective («**règlement**»), sans admission aucune de responsabilité des défendeurs, a été approuvé par l'honorable juge Suzanne Courchesne de la Cour Supérieure, le □ 2020. Le présent avis ne doit pas être interprété comme une reconnaissance par la Cour supérieure de quelque responsabilité ou probabilité de recouvrement de la part de tout membre du groupe. En fait, les défendeurs ont nié et continuent de nier toute allégation de faute formulée par le demandeur dans cette action collective. Cet avis offre un résumé du règlement.

## RÉSUMÉ DES CONDITIONS DU RÈGLEMENT

Un montant de 30\$ millions CDN sera payé (« **montant du règlement** ») et servira à résoudre, régler, libérer et acquitter toutes les réclamations faites – ou qui auraient pu être faites – par le demandeur en son propre nom ou au nom des membres du groupe à l'encontre des défendeurs, et ce, de façon définitive et permanente.

Le montant du règlement pour le groupe, déduction faite des frais judiciaires et débours, des frais de l'administrateur, et des taxes, sera distribué au groupe au *pro rata* conformément au plan de répartition approuvé par la Cour. Les distributions faites aux membres du groupe au Québec seront assujetties au prélèvement pour le « Fonds d'aide aux actions collectives ». Les honoraires des avocats des membres du groupe ont été approuvés par la Cour supérieure au montant de vingt-cinq (25) pourcent du montant du règlement, plus les débours et les taxes. Le règlement et le plan de répartition peuvent être consultés sur les sites-web <http://faguyco.com/en/portfolio/amaya-class-action/> et [Amayasecuritiessettlementcanada.ca](http://Amayasecuritiessettlementcanada.ca)

**UNE DEMANDE D'INDEMNISATION DOIT ÊTRE FAITE AVANT LE \_\_\_\_\_**

**Chaque membre du groupe doit soumettre un formulaire de réclamation rempli au plus tard cent vingt (120) jours après la date de la dernière publication de ce deuxième avis afin de pouvoir participer au règlement. Le formulaire de réclamation peut être consulté ou**

téléchargé à [amayasecuritiessettlementcanada.com](http://amayasecuritiessettlementcanada.com) ou obtenu en téléphonant à l'administrateur au 1-(877)-400-1211, ou par courriel au [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca).

Les membres du groupe doivent remplir le formulaire de réclamation et télécharger la documentation à l'appui sur le portail d'administration des réclamations en ligne à [amayasecuritiessettlementcanada.com/portal](http://amayasecuritiessettlementcanada.com/portal)

**Si vous ne soumettez pas de formulaire de réclamation rempli d'ici le \_\_\_\_\_, vous ne recevrez aucune part du montant du règlement net.**

La Cour supérieure a nommé Trilogy Class Action Services comme administrateur du règlement pour entre autres: (i) recevoir et traiter les formulaires de réclamation; (ii) décider de l'admissibilité à l'indemnisation; et (iii) distribuer le montant net du règlement aux membres du groupe admissibles. Vous ne pouvez soumettre un formulaire de réclamation papier que si vous n'avez pas accès à Internet. Le formulaire de réclamation papier peut être envoyé par la poste ou par courrier à:

**Administrateur, The Stars Group Inc./Amaya action collective en valeurs mobilières  
Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211  
Courriel : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)**

**Registre d'administration de demandes d'indemnisation:  
[Amayasecuritiessettlementcanada.com/portal](http://Amayasecuritiessettlementcanada.com/portal) (français et anglais)**

500-06-000785-168

**Schedule 2 D**

# AVIS DE RÈGLEMENT DE L'ACTION COLLECTIVE EN VALEURS MOBILIÈRES DE THE STARS GROUP INC. (ANCIENNEMENT AMAYA)

Veillez lire attentivement : ce qui suit pourrait affecter vos droits.

Cet avis vise toute personne et entité, à l'exclusion de certaines personnes liées aux Défendeurs, qui a acquis des valeurs mobilières de THE STARS GROUP INC. (« TSGI ») entre le 31 mars 2014 et le 22 mars 2016 (collectivement, le « groupe » ou les « membres du groupe »).

**SI VOUS ÊTES MEMBRE DU GROUPE DANS L'ACTION COLLECTIVE, VEUILLEZ LIRE ATTENTIVEMENT CE QUI SUIT, CAR CELA POURRAIT AFFECTER VOS DROITS.**

Le 24 mars 2016, une action collective proposée a été instituée à l'encontre de TSGI et d'autres, auprès de la Cour Supérieure du Québec (« **action collective** »). La question commune est définie comme suit : Les défendeurs ont-ils fait de fausses déclarations et omissions de faits importants dans les documents et déclarations publics de TSGI concernant ses pratiques commerciales?

Le règlement de l'action collective (« règlement »), sans admission aucune de responsabilité des défendeurs, a été approuvé par l'honorable juge Suzanne Courchesne de la Cour Supérieure le 11 mai 2020. Les défendeurs ont nié et continuent de nier toute allégation de faute formulée par le demandeur dans cette action collective. Cet avis offre un résumé du règlement.

## LE JUGEMENT D'AUTORISATION

Le 21 janvier 2020, l'honorable juge Suzanne Courchesne de la Cour supérieure du Québec a autorisé l'introduction de l'action collective dans le dossier no 500-06-000785-168 à des fins de règlement seulement.

**Pierre Derome**

c.

*The Stars Group Inc. et al.*

Le groupe est défini comme suit:

- i) «**Sous-catégorie du marché primaire**»: toutes les personnes et entités, où qu'elles résident ou peuvent être domiciliées, autres que les personnes exclues, qui, au cours de la période de l'action collective, ont acquis des titres de TSGI dans le cadre d'un placement et détenaient tout ou partie de ces titres au moins jusqu'au 23 mars 2016;
- ii) «**Sous-catégorie du marché secondaire**»: toutes les personnes et entités, où qu'elles résident ou peuvent être domiciliées, autres que les personnes exclues, qui, au cours de la période de l'action collective, ont acquis des titres de TSGI sur le marché secondaire et détenaient tout ou partie de ces titres jusqu'au moins le 23 mars 2016 et qui:
  - Sont résidentes du Canada, ou étaient résidentes du Canada, au moment de leurs acquisitions, indépendamment de l'endroit de la bourse sur laquelle elles ont acquis les titres de TSGI; ou
  - Ont acquis des titres de TSGI sur le marché secondaire au Canada ou ailleurs, sauf aux États-Unis.

Vous êtes automatiquement membre du groupe si vous répondez à la description ci-dessus. Cependant, les défendeurs, membres des familles immédiates de David Baazov, Daniel Y. Sebag, Divyesh Gadhia, Harlan W. Goodson et Wesley K. Clark, ainsi que les administrateurs, dirigeants, filiales et sociétés affiliées de TSGI et de ses filiales sont exclus du groupe.

## LA NATURE DES RÉCLAMATIONS

Le demandeur a intenté l'action collective alléguant essentiellement de fausses déclarations de faits importants concernant les pratiques commerciales et les déclarations publiques.

Les défendeurs contestent les allégations de la demande. Cet avis ne signifie pas que la Cour a trouvé une responsabilité ou une probabilité de recouvrement de la part d'un membre du groupe. Les défendeurs ont nié et continuent de nier toutes les allégations formulées par le demandeur dans le cadre de l'action collective.

Les causes d'action autorisées à des fins de règlement seulement sont:

- i) une réclamation du marché primaire pour informations fausses ou trompeuses relatives aux offres publiques en vertu de l'art. 217 et suiv. de la Loi sur les valeurs mobilières du Québec, RLRQ C V-1.1, tel que modifiée (la « LVM »);
- ii) une réclamation du marché secondaire pour fausses déclarations et omissions de faits importants sous l'art. 225.4 et suiv. de la LVM; et
- iii) un recours de droit civil sous l'article 1457 du Code civil du Québec.

## RÉSUMÉ DU RÈGLEMENT

Un montant de 30\$ millions CDN sera payé (« **montant du règlement** ») et servira à résoudre, régler, libérer et acquitter toutes les réclamations faites – ou qui auraient pu être faites – par le demandeur en son propre nom ou au nom des membres du groupe à l'encontre des défendeurs, et ce, de façon définitive et permanente.

Le montant du règlement pour le groupe, déduction faite des frais judiciaires et débours, des frais de l'administrateur, et des taxes, si approuvé par la Cour, sera distribué au groupe au *pro rata* conformément au plan de répartition approuvé par la Cour. Les distributions faites aux membres du groupe au Québec seront assujetties au prélèvement pour le «*Fonds d'aide aux actions collectives*». Le règlement et le plan

de répartition peuvent être consultés sur les sites-web <http://faguyco.com/en/portfolio/amaya-class-action/> et [amayasecuritiessettlementcanada.com](http://amayasecuritiessettlementcanada.com)

## FRAIS JUDICIAIRES, DÉBOURS ET TAXES

Les honoraires des avocats des membres du groupe ont été approuvés par la Cour supérieure au montant de vingt-cinq (25) pourcent du montant du règlement, plus les débours et les taxes.

## DEMANDE D'INDEMNISATION

Chaque membre du groupe doit soumettre un formulaire de réclamation rempli au plus tard cent vingt (120) jours après la date de la dernière publication de ce deuxième avis afin de pouvoir participer au règlement. Le formulaire de réclamation peut être consulté ou téléchargé à [amayasecuritiessettlementcanada.com](http://amayasecuritiessettlementcanada.com) ou obtenu en appelant l'administrateur au 1-(877)-400-1211 ou par courriel à [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca).

Les membres du groupe doivent remplir le formulaire de réclamation et télécharger la documentation à l'appui sur le portail d'administration des réclamations en ligne à [amayasecuritiessettlementcanada.com/portal](http://amayasecuritiessettlementcanada.com/portal).

**Si vous ne soumettez pas de formulaire de réclamation rempli d'ici le \_\_\_\_\_, vous ne recevrez aucune part du montant du règlement net.**

La Cour supérieure a nommé Trilogy Class Action Services comme administrateur du règlement pour entre autres: (i) recevoir et traiter les formulaires de réclamation; (ii) décider de l'admissibilité à l'indemnisation; et (iii) distribuer le montant net du règlement aux membres du groupe admissibles. Vous ne pouvez soumettre un formulaire de réclamation papier que si vous n'avez pas accès à Internet. Le formulaire de réclamation papier peut être envoyé par la poste ou par courrier à:

**Administrateur, The Stars Group Inc./Amaya  
action collective en valeurs mobilières  
Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,**

Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211  
Courriel : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)

Registre d'administration de demandes  
d'indemnisation:

*[Amayasecuritiessettlementcanada.com/portal](http://Amayasecuritiessettlementcanada.com/portal)  
(français et anglais)*

### INFORMATION ADDITIONNELLE

Cet avis a été approuvé par la Cour supérieure du Québec. Les décisions de la Cour et d'autres informations dans les deux langues sont disponibles sur le site Web des avocats du groupe à l'adresse <http://faguyco.com/portfolio-amaya-class-action>.

Toute question adressée aux avocats des membres du groupe peut être dirigée aux adresses suivantes :

Shawn Faguy  
**Faguy & Co.**  
329 de la Commune Ouest, Suite 200  
Montréal, Québec H2Y 2E1  
Téléphone: 514.285.8100 x225  
Télécopieur: 514.285.8050  
Courriel: [classactions@faguyco.com](mailto:classactions@faguyco.com)

Ou

Eli Karp  
**Morganti & Co., P.C.**  
21 St Clair Ave, Ste 1102  
Toronto, Ontario, M4T 1L9  
Téléphone: 647.344.1900 x2  
Courriel : [ekarp@morgantico.com](mailto:ekarp@morgantico.com)

**Veillez noter que la Cour ne peut répondre à aucune question sur les points traités dans le présent avis.**

### AVIS AUX ENTREPRISES DE COURTAGE

Veillez envoyer cet avis par courriel à vos clients qui ont acquis des titres de TSFI pendant la période de l'action collective et pour lesquels vous avez, ou pouvez, obtenir des adresses courriels valides. Si vous avez des clients qui ont

acquis ces titres pendant la période de l'action collective, mais pour lesquels vous n'avez pas ou ne pouvez pas obtenir les adresses courriels valides, veuillez contacter Trilogy Class Action Services pour obtenir des copies papier de cet avis afin de poster (par courrier ordinaire) l'avis à ces clients.

Trilogy Class Action Services  
Amaya Securities Class Action Settlement  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211

Courriel : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)

**Cet avis a été approuvé par la Cour supérieure.  
AUCUNE question sur cet avis ne doit être  
adressée à la Cour supérieure**

500-06-000785-168

**Schedule 3**

## PLAN OF ALLOCATION

### THE DEFINED TERMS

1. The definitions set out in the settlement agreement reached between the Plaintiff and Defendants dated November 25, 2019 (“**Agreement**”), except as modified or defined herein, apply to and are incorporated into this Plan of Allocation:
  - (a) “**Acquisition Expense**” means the total monies paid by the Claimant (including brokerage commissions) to acquire Eligible Securities;
  - (b) “**Claimant**” means a Class Member who submitted a properly completed Claim Form and all required supporting documentation to the Administrator in the online claims administration portal, on or before the Claims Bar Deadline;
  - (c) “**Compensation Fund**” means the Settlement Amount less Class Counsel Fees, Administration Expenses and other expenses decided by the Court, as allocated between the Primary Market Sub-Class and Secondary Market Sub-Class;
  - (d) “**Database**” means the web-based database in which the Administrator stores information received from the Claimants and/or acquired through the claims process;
  - (e) “**Distribution**” means payment to Authorized Claimants in accordance with this Plan of Allocation, the Agreement and any order of the Court;
  - (f) “**Distribution List**” means a list containing the name and address of each Authorized Claimant, the calculation of his/her/its net loss and the calculation of the Authorized Claimant’s *pro rata* share of the Compensation Fund;
  - (g) “**Escrow Account**” means the trust account holding the Compensation Fund and used by the Administrator to make the Distribution in accordance with this Plan of Allocation;

- (h) “**Maximum Entitlement**” means an Authorized Claimant’s actual loss on Eligible Securities, as calculated pursuant to the formula set forth in section 7 herein;
- (i) “**Reference**” means the procedure by which a Claimant who disagrees with the Administrator’s decision relating to eligibility for compensation, the determination of the number of Eligible Securities, or the amount of the Distribution, may appeal the Administrator’s decision and have it reviewed by the Referee;
- (j) “**Sub-Class**” means each the Primary and Secondary Market subclasses; and
- (k) “**Website**” means the website at [Amayasecuritiessettlementcanada.ca](http://Amayasecuritiessettlementcanada.ca)

#### **THE OVERVIEW**

2. This Plan of Allocation contemplates a determination of eligibility and an allocation and Distribution to each Authorized Claimant of a share of the Compensation Fund calculated on the basis of the calculation set forth herein, up to the Maximum Entitlement for each Authorized Claimant.

#### **CALCULATION OF THE DISTRIBUTION AND MAXIMUM ENTITLEMENT**

3. The Distribution to Primary Market Sub-Class Authorized Claimants will be capped at CDN \$2,500,000, minus the pro rata payment of Class Counsel Fees and Administration Expenses. Any remainder after the Primary Market Authorized Claimants have been paid, or if no such payment is effected, will revert to and be paid to Secondary Market Sub-Class Authorized Claimants;

4. The Distribution to each Authorized Claimant will be calculated by the Administrator by allocating the Compensation Fund to the Primary and Secondary Markets and then by dividing the Compensation Fund in each sub-class by the total number of Eligible Securities for all Authorized Claimants in each Sub-Class to arrive at a per Eligible Security distribution amount defined herein as the “*Pro Rata Distribution*”;
5. The Administrator will then multiply the *Pro Rata* Distribution by the number of Eligible Securities held by an Authorized Claimant to arrive at the Distribution to be paid to each Authorized Claimant;
6. In no event shall an Authorized Claimant receive a Distribution greater than his/her/its Maximum Entitlement;
7. The Maximum Entitlement shall be calculated as follows:
  - (a) For Eligible Securities disposed of on or before April 6, 2016, the difference between the average price paid for those Eligible Securities (including any commissions paid in respect thereof) and the price received upon the disposition of those Eligible Securities (without deducting any commissions paid in respect of the disposition), multiplied by the number of the Eligible Securities;
  - (b) For Eligible Securities not disposed of on or before April 6, 2016, the lesser of:
    - i. An amount equal to the difference between the average price paid for those Eligible Securities (including any commissions paid in respect thereof) and the price received upon the disposition of those Eligible Securities (without deducting any commissions paid in respect of the disposition); and
    - ii. An amount equal to the number of Eligible Securities not disposed of by an Authorized Claimant, multiplied by the difference between the

average price paid for those Eligible Securities (including any commissions paid in respect thereof determined on a per security basis) and the ten-day volume-weighted average trading price for those Eligible Securities following March 23, 2016.

#### **GENERAL PRINCIPLES OF THE ADMINISTRATION OF THE AGREEMENT**

8. The administration process to be established shall:
  - (a) implement and conform to the Plan of Allocation;
  - (b) employ secure, paperless, web-based systems with electronic registration, claim form and record keeping, wherever practical, deemed to be the online claims administration portal ("*portal*"); and
  - (c) be bilingual (English, French) in all respects and include a bilingual website and a bilingual toll-free telephone helpline.

#### **THE ADMINISTRATOR**

9. The Administrator shall have such powers and rights reasonably necessary to discharge its duties and obligations to implement and administer the Escrow Account and the Plan of Allocation in accordance with their terms, subject to the direction of the Court.

#### **THE ADMINISTRATOR'S DUTIES AND RESPONSIBILITIES**

10. The Administrator shall administer the Plan of Allocation under the oversight and direction of the Court and act as trustee in respect of the monies held within the Escrow Account upon receipt from Class Counsel.

11. The Administrator shall, wherever practical, develop, implement and operate an administration system utilizing web-based technology and other electronic systems for the following:
  - (a) receipt of information from Computershare and/or TMX Equity Transfer Services or Broadridge Financial Solutions Inc. concerning the identity and contact information of registered holders or beneficial owners of Eligible Securities, respectively;
  - (b) Class notification, as required;
  - (c) claim filing and document collection;
  - (d) claim evaluation, analysis, and Reference procedures;
  - (e) distribution analysis and Distributions;
  - (f) *cy près* award distribution, if any, and reporting thereon;
  - (g) Administration Expenses payments; and
  - (h) cash management, audit control and reporting thereon.
  
12. The Administrator's duties and responsibilities shall include the following:
  - (a) receiving the monies in the Escrow Account from and investing them in trust in accordance with the Agreement;
  - (b) paying the levy to the *Fonds d'aide aux actions collectives* in accordance with the applicable regulation. For the purposes of calculating the levy to the *Fonds d'aide*, Quebec residents are estimated to be twenty-three percent (23%) of the Class;
  - (c) preparing any protocols required for submission to and approval of the Court;
  - (d) preparing and disseminating the Notices pursuant to the Plan of Notice;

- (e) providing notice of (i) the Second Motion, namely that the Agreement was approved, and (ii) details of how, where, and by when to submit completed Claim Forms;
- (f) providing the hardware, software solutions and other resources necessary for an electronic web-based bilingual claims processing centre to function in a commercially reasonable manner;
- (g) providing, training and instructing personnel in such reasonable numbers as are required for the performance of its duties in the most expedient, commercially reasonable manner;
- (h) developing, implementing and operating electronic web-based systems and procedures for receiving, processing, evaluating and decision-making respecting the claims of Class Members, including making all necessary inquiries to determine the validity of such claims;
- (i) if practicable, providing any Class Member whose Claim Form is not properly completed or does not include some of the required supporting documentation, an opportunity to remedy the deficiency as stipulated in the Agreement;
- (j) making timely assessments of eligibility for compensation and providing prompt notice thereof;
- (k) paying all taxes accruing on the interest earned in the Escrow Account and adding that interest (net of taxes) to the Compensation Fund;
- (l) making Distributions from the Compensation Fund in a timely fashion;
- (m) dedicating sufficient personnel to communicate with a Claimant or Class Member in English or French as the Claimant elects;

- (n) using its best efforts to ensure that its personnel provide timely, helpful and supportive assistance to Claimants or Class Members in completing the claims application process and in responding to inquiries respecting claims;
  - (o) preparing for, attending and defending its decisions at all References;
  - (p) distributing and reporting on any *cy près* awards;
  - (q) making payments of Administration Expenses;
  - (r) maintaining a Database with all information necessary to permit the Court to evaluate the progress of the administration, as may, from time to time, be required;
  - (s) reporting to the Court respecting claims received and administered, and Administration Expenses; and
  - (t) preparing such financial statements, reports and records as directed by the Court.
13. The Administrator shall pay all of the costs and expenses reasonably and actually incurred in connection with the provision of notices, locating Class Members for the sole purpose of providing notice to them, soliciting Class Members to submit a Claim Form, including the notice expenses reasonably and actually incurred by the Administrator and brokerage firms in connection with the provision of notice of the Agreement to Class Members (provided, however, that the Administrator shall not pay in excess CAD \$15,000 in the aggregate to all brokerage firms and, if the aggregate amount claimed by such brokerage firms exceeds CAD\$15,000.00, then the Administrator shall distribute the sum of CAD \$15,000 to such brokerage firms on a *pro rata* basis).
14. The Administrator shall cause the information in the Database to be secured and accessible from the Website to an individual with a user identification name and password.

15. Information in the Database concerning a claim shall be accessible to the Claimant electronically. Each Claimant shall use a unique personal user identification name and personal password that will permit the Claimant to access only his/her/its own information in the Database.
16. Once a Claim Form and required supporting documentation are received by the Administrator, the Administrator shall:
  - (a) determine the number of Eligible Securities;
  - (b) decide whether the Claimant is eligible to participate in the Distribution;
  - (c) calculate the *Pro Rata* Distribution; and
  - (d) calculate the Maximum Entitlement for each Authorized Claimant.
17. Once the Administrator determines a Claimant's Authorized Claimant status, the respective number of his, her or its Eligible Securities and his, her or its *Pro Rata* Distribution from the Compensation Fund, the Administrator shall advise the Claimant of the Administrator's decision by posting it on the Claimant's online claim file.
18. The Administrator may deal with Claimants in a manner that is not through an electronic medium, as and when it determines that such a step is feasible and/or necessary. However, in all cases the information acquired concerning Claimants shall be entered into the Database.
19. A decision of the Administrator in respect of a claim and any Claimant's entitlement to participate in or receive a share of the Distribution, subject to the Claimant's right to elect to refer the decision to the Referee for review, will be final and binding upon the Claimant and the Administrator.

**THE REFEREE**

20. The Referee shall have such powers and rights as are reasonably necessary to discharge his or her duties and obligations.
21. The Referee shall establish and employ a summary procedure to review any disputes arising from a decision of the Administrator, and may enter into such mediation and arbitration proceedings as the Referee may deem necessary.
22. All decisions of the Referee shall be in writing and shall be final and conclusive and there shall be no appeal therefrom whatsoever.

**THE PROCEDURE FOR REFERENCE**

23. If a Claimant disagrees with the Administrator's decision relating to eligibility to share in the Distribution, the determination of the number of Eligible Securities, or the amount of his/her/its Maximum Entitlement, a Claimant may elect a Reference by the Referee by delivering a written election for review to the Administrator within fifteen (15) days of receipt of the Administrator's decision.
24. The election for a Reference must set out the basis for the disagreement with the Administrator's decision and attach all documents relevant to the review which have not previously been delivered to the Administrator. This election for a Reference must be accompanied by a certified cheque or money order, payable to the Administrator, in the amount of \$150.
25. Upon receipt of an election for a Reference, the Administrator shall provide the Referee with online access to a copy of:
  - (a) the election for a Reference and accompanying documents;

- (b) the Administrator's decision on eligibility, the number of Eligible Securities and its calculation of the Maximum Entitlement, as applicable; and
  - (c) the Claim Form and supporting documents.
26. The Referee will carry out the Reference in an inexpensive, summary manner. The Referee will provide all necessary procedural directions and the review will be in writing unless the Referee provides otherwise.
27. The Administrator shall participate in the process established by the Referee to the extent directed by the Referee.
28. The Referee shall deliver a written decision to the Claimant and the Administrator. If the Referee overturns the Administrator's decision relating to eligibility to share in the Distribution, the number of Eligible Securities or his/her/its Maximum Entitlement, the Administrator shall return the \$150 deposit to the Claimant. If the Referee does not overturn the Administrator's decision, the Administrator shall add the \$25 to the Compensation Fund and return \$125 to the Claimant.

**ADMINISTRATION EXPENSES**

29. The Administrator shall pay the fees, disbursements, taxes, levies, and other costs of:
- (a) the Administrator;
  - (b) the Referee;
  - (c) the Fonds d'aide aux actions collectives; and
  - (d) such other persons at the direction of the Court.
- out of the Settlement Amount in accordance with the provisions of the Agreement, the Second Order and any other orders of the Court.

**DISTRIBUTION TO AUTHORIZED CLAIMANTS**

30. As soon as practicable after the completion of the claims submission and election for review process, the Administrator will bring a motion to the Court for authorization to make Distributions from the Compensation Fund. In support of this motion, the Administrator will file the Distribution List with the Court in a manner that protects the privacy of persons on the Distribution List.
31. No Distribution shall be made by the Administrator until authorized by the Court.
32. No Distribution shall be made by the Administrator in respect of any amount under \$5, and the name(s) of the Authorized Claimant(s) with claims under this amount shall be excluded from the Distribution List in respect of such claims.
33. The Administrator may make interim Distributions if authorized by the Court.
34. Each Authorized Claimant whose name appears on the Distribution List shall comply with any condition precedent to Distribution that the Court may impose.
35. The Administrator shall make Distributions from the Compensation Fund forthwith after receipt of authorization from the Court to make Distributions to the Authorized Claimants whose names are on the Distribution List.
36. If the Escrow Account is in a positive balance (whether by reason of tax refunds, uncashed cheques or otherwise) in an amount greater than 10% of the net Settlement Amount after one hundred eighty-three (183) days from the date of Distribution of the Compensation Fund to the Authorized Claimants, the Administrator shall allocate such balance among Authorized Claimants whose names are on the Distribution List in an equitable fashion up to the limit of each Authorized Claimant's actual loss. The Administrator may wait until a CRA T-5 tax slip for investment income is issued by the Schedule One bank in respect of the Escrow Account before making this second

distribution. If there is a balance in the Escrow Account after each Authorized Claimant is paid up to his/her/its actual loss, the remaining funds shall be paid *cy près* to a recipient selected by Class Counsel and approved by the Court, after the levy to the Fonds d'aide aux actions collective is paid in accordance with the applicable regulation and based on the Quebec population representing twenty-three percent (23%) of the Class;

**RESTRICTION ON CLAIMS**

37. Any Class Member who does not submit a Claim Form and required supporting documentation with the Administrator on or before the Claims Bar Deadline, will not be permitted to participate in the Distribution without permission of the Court. The Administrator will not accept or process any Claim Form received after the Claims Bar Deadline unless directed to do so by the Court.

**NO ASSIGNMENT**

38. No amount payable under this Plan of Allocation may be assigned without the written consent of the Administrator.

**ADMINISTRATOR'S FINAL REPORT TO THE COURT**

39. Upon the conclusion of the administration, or at such other time as the Court direct, the Administrator shall report to the Court on the administration and shall account for all monies it has received, administered and disbursed by Distribution or otherwise, and may obtain an order from the Court discharging it as Administrator.

500-06-000785-168

**Schedule 4A**

Claim Form must be postmarked, emailed, faxed or submitted electronically (on-line portal:  
*Amayasecuritiessettlementcanada.com/portal*) by  
11:59 pm on \_\_, 2020

**CLAIM FORM**  
**The Stars Group Inc. (formerly Amaya Inc.)**  
**Securities Litigation Class Action Settlement**

**Pierre Derome**

**v.**

**The Stars Group Inc., David Baazov, Daniel Y. Sebag, Divyesh Gadhia,  
Harlan W. Goodson and Wesley K. Clark**

Superior Court of Quebec: Court File Number 500-06-000785-168

**Administrator:**

Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel : 1-877-400-1211  
Email : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)

**Website: *Amayasecuritiessettlementcanada.ca***

Class Members are required to complete the Claim Form and upload the supporting  
documentation in the online claims administration  
portal <https://amayasecuritiessettlementcanada.com/portal>



**Claimants must provide the following information and all supporting documents:**

A. Number of Eligible Securities purchased "A"	
B. Number of Eligible Securities disposed of on or before April 6, 2016 "B"	
C. The average price paid Eligible Securities (including commissions) "C"	
D. The average price received upon disposition of Eligible Securities (without deducting commissions) "D"	
E. Number of Eligible Securities <b>not</b> disposed of on or before April 6, 2016 "E"	
F. The number of Eligible Securities disposed of after April 6, 2016 "F"	

I declare under penalty of perjury and disqualification to receive payment from the Compensation Fund, under the laws of the Province of Quebec, that all of the foregoing information, documentation, calculations and identity supplied in my Claim Form Package by the undersigned is true, accurate and correct.

Executed this \_\_\_\_\_ day of , in , \_\_\_\_\_  
(City) Province/State

\_\_\_\_\_  
Name and Position (Signature)

500-06-000785-168

**Schedule 4B**

Le formulaire de réclamation doit être envoyé par courriel, télécopieur ou soumis par voie électronique, portail en ligne: [Amayasecuritiessettlementcanada.com/portal](https://amayasecuritiessettlementcanada.com/portal), avant

23 h 59 le \_\_ 2020.

**FORMULAIRE DE RÉCLAMATION**  
**The Stars Group Inc. (anciennement Amaya Inc.)**  
**Règlement de l'Action collective en valeurs mobilières**

**Pierre Derome**

**c.**

**The Stars Group Inc., David Baazov, Daniel Y. Sebag, Divyesh Gadhia,  
Harlan W. Goodson and Wesley K. Clark**  
Cour Supérieure du Québec: Dossier no 500-06-000785-168

**Administrateur**

**Trilogy Class Action Services**  
**117 Queen Street, P.O. Box 1000,**  
**Niagara-on-the-Lake, ON, Canada**  
**Tel : 1-877-400-1211**  
**Courriel : [inquiry@trilogyclassactions.ca](mailto:inquiry@trilogyclassactions.ca)**

**Site Web: [Amayasecuritiessettlementcanada.ca](https://amayasecuritiessettlementcanada.ca)**

Les membres du groupe doivent remplir le formulaire de réclamation et télécharger la documentation à l'appui sur le portail d'administration des réclamations en ligne  
<https://amayasecuritiessettlementcanada.com/portal>



**Les membres du groupe doivent fournir les informations et les documents à l'appui suivants :**

<b>A. Nombre de valeurs mobilières éligible achetées « A »</b>	
<b>B. Nombre de valeurs mobilières éligibles aliénées le ou avant le 6 avril 2016, "B"</b>	
<b>C. Le prix moyen payé pour l'acquisition des valeurs mobilières éligibles, incluant les commissions, "C"</b>	
<b>D. Le prix moyen reçu en paiement pour l'aliénation des valeurs mobilières éligibles, sans déduction faite des commissions, "D"</b>	
<b>E. Nombre de valeurs mobilières éligibles non-aliénées le ou avant le 6 avril, 2016 "E"</b>	
<b>F. Le nombre de valeurs mobilières éligibles aliénées le 6 avril 2016 "F"</b>	

Je déclare sous peine de parjure et de disqualification de recevoir un paiement du Fonds d'indemnisation, en vertu des lois de la province de Québec, que toutes les informations, documents, calculs et identité ci-dessus fournis dans mon dossier de réclamation par le soussigné sont véridiques, exacts et corrects.

Exécuté en ce \_\_\_ jour du mois de \_\_\_\_\_, 2020, dans la ville de \_\_\_\_\_, province de \_\_\_\_\_.

\_\_\_\_\_  
 (Signature)  
 Nom