

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

ADELA BAI, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TCP INTERNATIONAL HOLDINGS  
LTD., KAREL ROBERT DEN DAAS,  
ELLIS YAN, and BRIAN CATLETT

Defendants.

Case No.: 1:16-cv-00102

JUDGE: Hon. Donald C. Nugent

**DECLARATION OF SARAH EVANS  
CONCERNING THE MAILING OF THE POSTCARD NOTICE AND CLAIM FORM,  
PUBLICATION OF SUMMARY NOTICE, EXCLUSION REQUESTS RECEIVED, AND  
OBJECTIONS SUBMITTED**

I, Sarah Evans, declare as follows:

1. I submit this declaration in order to provide the Court and the parties to the above-captioned litigation with information regarding the following: the mailing of the Postcard Notice of Pendency of Class Action and Proposed Settlement, Settlement Fairness Hearing, and Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Postcard Notice") and Proof of Claim and Release Form (the "Claim Form") (collectively, the "Postcard Notice and Claim Form"); the publication of the Summary Notice of Pendency of Class Action and Proposed Settlement, Settlement Fairness Hearing, and Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Summary Notice"), pursuant to the Court's Order Preliminarily Approving the Settlement, Directing the Issuance of Notice, and Scheduling a Final Approval Hearing, dated July 28, 2017 (the "Court's July 28, 2017 Order"), under Federal Rule of

Civil Procedure 23(e); the requests for exclusion received; and the objections submitted. I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein.

2. I am the Project Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized class-action-administration firm. I have over three years of experience specializing in class-action administration. SCS was established in April 1999 and has administered over three-hundred fifty (350) class actions since its inception.

3. In connection with the settlement, SCS was retained to provide administrative services as part of the settlement administration process in the above-captioned litigation. Our services include the following, without limitation: the printing and mailing of the Postcard Notice and Claim Form approved by the Court (**Exhibit A**) to potential class members; arranging for publication of the Summary Notice; notifying brokerage firms or other nominee accounts of the appropriate manner to provide individual notice to class members, both individually and on a published basis; tracking requests for exclusion; distributing, accepting, and processing Claim Forms filed by class members; reviewing submitted Claim Forms for accuracy and completeness and to ensure that they are supported by sufficient documentary evidence; providing notices to those claims that are deficient or rejected, when appropriate; calculating recognized claims of the class, on both an individual and class-wide basis; and all other services necessary to administer the Settlement.

4. To provide actual notice to those persons or entities who purchased the publicly traded common stock of TCP International Holdings, Ltd. (“TCPI”) during the period from May 9, 2015, through November 5, 2015, inclusive (the “Class Period”), we mailed, by first class mail, postage prepaid, the Postcard Notice and Claim Form approved by the Court to the 21 individuals

and organizations identified on the records of TCPI's transfer agent. These records reflect persons and entities that purchased TCPI common stock for their own account or for the account(s) of their clients during the Class Period. In addition, SCS maintains a master list consisting of the 815 largest banks and brokerage companies ("Nominee Account Holders"), as well as 652 mutual funds, insurance companies, pension funds, and money managers ("Institutional Groups") that may have traded or owned TCPI common stock in their clients' or their own accounts. A letter was mailed to all brokerage companies, banks, and trust companies contained on this master mailing list, notifying them of the most recent settlement and asking them to, within ten (10) days from the date of the letter, either send the Postcard Notice and Claim Form to beneficial owners or provide SCS with a list of names and addresses of such beneficial owners, so that SCS could promptly mail the Postcard Notice and Claim Forms directly to them. A copy of the letter sent to these organizations is attached as **Exhibit B**. Both mailings were completed on or before August 28, 2017, as required by the Court's July 28, 2017 Order.

5. SCS also posted the Notice of Pendency of Class Action and Proposed Settlement, Settlement Fairness Hearing and Motion For Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Long Form Notice"), the Postcard Notice, the Claim Form, and the Stipulation of Settlement at SCS' website, [www.strategicclaims.net](http://www.strategicclaims.net), where it has been available to the public since August 11, 2017.

6. As noted above, SCS mailed or e-mailed 1,467 letters (*see* Exhibit B) to the Nominee Account Holders and Institutional Groups contained on SCS's master mailing list. In addition, SCS has mailed 1,476 Notice and Claim Forms to potential Settlement Class Members or nominees. Of those 1,476 Notice and Claim Forms, 21 were mailed directly to individuals and organizations from the shareholders' list provided by the transfer agent and the additional 1,455

were requested by, and provided to, the Nominee Account Holders and Institutional Groups and other individuals.

7. SCS also sent the Depository Trust Company (“DTC”) the Notice and Claim Form for the DTC to publish on the Legal Notice System (“LENS”). LENS provides DTC participants the ability to search and download legal notices as well as receive email alerts based on particular notices or particular CUSIPs once the legal notice is posted.

8. Pursuant to the Court’s July 28, 2017 Order, the Summary Notice was published electronically over *Globe Newswire* beginning on August 28, 2017, and in print once in the *Investor’s Business Daily*, on August 28, 2017, as shown in the confirmations of publication attached hereto as **Exhibit C**.

9. In addition to the above, Co-Lead Counsel Pomerantz LLP and Levi & Korsinsky, LLP published additional notice of the Settlement over *Globe Newswire* on no less than eight (8) occasions. These notices occurred on August 28, September 5, September 12, September 15, September 19, September 22, September 27, and September 29. True and accurate copies of these notices are attached hereto collectively as **Exhibit D**.

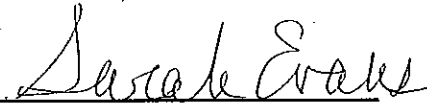
10. The notice procedures described in paragraphs three (3) through nine (9) above are consistent with the procedures SCS has used in each of the securities litigation class actions in which I have been involved over the past three years.

11. To date, SCS has not received any requests for exclusion. The deadline for exclusion requests is January 12, 2018.

12. To date, SCS has not received any objections to the Settlement, any part of the Settlement, nor Lead Counsel’s motion for attorneys’ fees and expenses and application for an award to Lead Plaintiffs. The deadline for objections is January 12, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15<sup>th</sup> day of December 2017, in Media, Pennsylvania.

  
Sarah Evans  
Sarah Evans