

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

DALTON PETRIE, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

ELECTRONIC GAME CARD, INC.; LEE J.
COLE; LINDEN BOYNE; KEVIN DONOVAN,
PAUL FARRELL, EUGENE CHRISTIANSEN,
ANNA HOUSSELS, AND LYNNE
ROCHELLE ATTIAS AND JONATHAN
STEINBERG AS EXECUTORS OF THE
ESTATE OF LORD LEONARD STEINBERG,

Defendants.

Case No.: SACV 10-0252 DOC (RNBx)

CLASS ACTION

PENNY PACE, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

TIMOTHY QUINTANILLA, HENRY
MENDOZA, BILL TORRES, JAMES
FRANCIS BERGER, AND CINDY E.
GONZALEZ,

Defendants.

Case No. SACV 14-02067-DOC (RNBx)

**NOTICE OF PENDENCY AND
SETTLEMENT OF CLASS ACTION**

If you purchased or otherwise acquired the common stock ("Stock") of Electronic Game Card, Inc. ("Electronic Game Card" or the "Company") during the period from April 5, 2007 through and including May 18, 2010, you could get a payment from a class action settlement (the "Settlement").

Under law, a federal court has authorized this notice.

- If approved by the Court, the settlement will provide \$1.755 million, plus interest (the "Settlement Amount"), to pay claims of investors who purchased Electronic Game Card Stock during the period from April 5, 2007 through and including May 18, 2010 (the "Class Period").
- The Settlement represents an average recovery of \$.025 per share of Electronic Game Card Stock for the 70.1 million shares outstanding as of May 18, 2010. A share may have been traded more than once during the Class Period. This estimate solely reflects the average recovery per outstanding share of Electronic Game Card Stock. The indicated average recovery per share will be the total average recovery for all purchasers of that share. This is not an estimate of the actual recovery per share you should expect. Your actual recovery will depend on the aggregate losses of all Class Members, the date(s) you purchased and sold Electronic Game Card Stock, and the total number and amount of claims filed.

- Attorneys for Class Representatives (“Class Counsel”) intend to ask the Court to award them fees of up to \$438,750 or twenty-five percent (25%) of the Settlement Amount, reimbursement of litigation expenses of no more than \$550,000 and an award to the Class Representatives not to exceed \$5,000 each. Collectively, the attorneys’ fees and expenses are estimated to average \$.014 per share of Electronic Game Card Stock. If approved by the Court, these amounts will be paid from the Settlement Fund.
- The approximate recovery, after deduction of attorneys’ fees and expenses approved by the Court, is an average of \$.011 per share of Electronic Game Card Stock. This estimate is based on the assumptions set forth in the preceding paragraph. Your actual recovery, if any, will vary depending on your purchase price and sales price, and the number and amount of claims filed.
- The Settlement resolves the lawsuits as to whether defendants Estate of Lord Leonard Steinberg (“Steinberg Estate”), Eugene Christiansen (“Christiansen”), Kevin Donovan (“Donovan”), Paul Farrell (“Farrell”), Timothy Quintanilla (“Quintanilla”), Henry Mendoza (“Mendoza”), Bill Torres (“Torres”), James Francis Berger (“Berger”), and Cindy E. Gonzalez (“Gonzalez”) (collectively, the “Settling Defendants”) were control persons of Electronic Game Card, and whether Electronic Game Card made false and misleading statements, in violation of federal securities laws, including the issuance of false and misleading financial statements, engaging in a fraud to conceal and misstate Electronic Game Card’s true financial condition; and issuance of materially misleading “clean” or unqualified audit reports for Electronic Game Card’s financial statements. The Settling Defendants deny all allegations of misconduct.
- This is a partial settlement. The class action will continue against the other defendants. The outcome of the case and whether there will be any recovery against these non-settling defendants is uncertain. Electronic Game Card filed a petition for liquidation under Chapter 7 of the U.S. Bankruptcy Code, was liquidated, and is no longer part of this case.
- Your legal rights will be affected whether you act or do not act. If you do not act, you may permanently forfeit your right to recover on this claim. Therefore, you should read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM NO LATER THAN NOVEMBER 28, 2016	The only way to get a payment.
EXCLUDE YOURSELF NO LATER THAN DECEMBER 20, 2016	Get no payment. This is the only option that allows you to be part of any other lawsuit against the Settling Defendants about the legal claims in this case.
OBJECT NO LATER THAN DECEMBER 20, 2016	Write to the Court about why you do not like the settlement.
GO TO A HEARING ON JANUARY 9, 2017	Speak in Court about the fairness of the settlement.
DO NOTHING	Get no payment. Give up rights.

INQUIRIES

Please do not contact the Court regarding this notice. All inquiries concerning this Notice, the Proof of Claim form, or any other questions by Class members should be directed to:

Electronic Game Card Litigation c/o Strategic Claims Services 600 N. Jackson St., Ste. 3 P.O. Box 230 Media, PA 19063 Tel.: 866-274-4004 Fax: 610-565-7985 info@strategicclaims.net	Or	THE ROSEN LAW FIRM, P.A. 355 South Grand Avenue, Suite 2450 Los Angeles, CA 90071 Tel.: (213) 785-2610 Fax: (213) 226-4684 info@rosenlegal.com
--	-----------	---

COMMON QUESTIONS AND ANSWERS CONCERNING THE SETTLEMENT

1. Why did I get this Notice?

You or someone in your family may have acquired Electronic Game Card Stock during the Class Period.

2. What is this lawsuit about?

The cases involved are styled as *Petrie v. Electronic Game Card, Inc., et al.*, Case No. SACV 10-0252 DOC (RNBx) (“*Petrie Action*”) and *Pace v. Quintanilla, et al.*, Case No. SACV 14-02067-DOC (RNBx) (“*Pace Action*”) (collectively, the “*Litigations*”), and the Court in charge of the case is the United States District Court for the Central District of California.

Defendants in the Litigations are the Settling Defendants (as defined above), and non-settling defendants Lee J. Cole, Linden Boyne, and Anna Houssels (collectively, the “*Defendants*”). This proposed settlement resolves only the claims of the Settling Defendants, and does not resolve the claims of any other person or entity.

The lawsuit alleges that the Defendants violated the federal securities laws by issuing false and misleading financial statements, engaging in a fraud to conceal and misstate Electronic Game Card’s true financial condition; and issuing materially misleading “clean” or unqualified audit and interim reports for Electronic Game Card’s financial statements. The Settling Defendants deny they did anything wrong. The Settlement resolves all of the claims against the Settling Defendants in the Class Action.

3. Why is this a class action?

In a class action, one or more persons and/or entities, called Lead Plaintiffs, sue on behalf of all persons and/or entities who have similar claims. All of these persons and/or entities are referred to collectively as a Class, and these individual persons and/or entities are known as Class Members. One court resolves all of the issues for all Class Members, except for those Class Members who exclude themselves from the Class. When the Court certifies a class, class representatives are appointed by the Court to litigate the action on behalf of the certified class.

4. Why is there a Settlement?

Class Representatives and the Settling Defendants do not agree regarding the merits of Class Representatives’ allegations with respect to liability or the average amount of damages per share that would be recoverable if Class Representatives were to prevail at trial on each claim. The issues on which the Class Representatives and the Settling Defendants disagree include: (1) whether Electronic Game Card made false and misleading statements; (2) whether the Settling Defendants were control persons of Electronic Game Card; (3) whether the alleged false statements were the cause of the Class Members’ alleged damages; and (4) the amount of damages, if any, suffered by the Class Members.

This matter has not gone to trial and the Court has not decided in favor of either Class Representatives or the Settling Defendants. Instead, Class Representatives and the Settling Defendants have agreed to settle the Class Action. Class Representatives and Class Counsel believe the settlement is best for all Class Members because of the risks associated with continued litigation and the nature of the defenses raised by the Settling Defendants. Even if Plaintiffs win at trial, and also withstand the Settling Defendants' inevitable challenge on appeal, Plaintiffs might not be able to collect some, or all, of the judgment.

5. How do I know if I am part of the Class settlement?

To be a Class Member, you must have purchased or otherwise acquired Electronic Game Card Stock during the period from April 5, 2007 through and including May 18, 2010.

6. Are there exceptions to being included?

Yes. Excluded from the Class are the Settling Defendants, the other Defendants, Electronic Game Card, the present and former officers and directors of Electronic Game Card and any subsidiary thereof, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which any defendant or excluded person has or had a controlling interest. Also, if you exclude yourself from the Class, as described below, you are not a part of the Class.

7. What does the Settlement provide?

a. What is the Settlement Fund?

The proposed Settlement calls for the Settling Defendants to create a Settlement Fund (the "Settlement Fund") in the amount of \$1.755 million. The Settlement is subject to Court approval. Also, subject to the Court's approval, a portion of the Settlement Fund will be used to pay Class Counsel's attorneys' fees and reasonable litigation expenses and any award to Class Representatives. A portion of the Settlement Fund also will be used to pay taxes due on interest earned by the Settlement Fund, if necessary, and any notice and claims administration expenses permitted by the Court. After the foregoing deductions from the Settlement Fund have been made, the amount remaining (the "Net Settlement Fund") will be distributed to Class Members who submit valid claims.

b. What can you expect to receive under the proposed Settlement?

Your share of the Net Settlement Fund will or may depend on: (i) the number of claims filed; (ii) the dates you purchased and sold Electronic Game Card Stock; (iii) the prices of your purchases and sales; (iv) the amount of administrative costs, including the costs of notice; and (v) the amount awarded by the Court to Class Representatives and Class Counsel for attorneys' fees, costs, and expenses.

The compensable loss per share ("Recognized Claim") of each Authorized Claimant shall be calculated according to the following formula:

PROPOSED PLAN OF ALLOCATION

The Plan of Allocation is a matter separate and apart from the proposed Settlement, and any decision by the Court concerning the Plan of Allocation shall not affect the validity or finality of the proposed Settlement. The Court may approve the Plan of Allocation with or without modifications agreed to among the Parties, or another plan of allocation, without further notice to Class Members. Any orders regarding a modification of the Plan of Allocation will be posted to the Claims Administrator's website, www.strategicclaims.net.

Defendants Steinberg Estate, Christiansen, Donovan, and Farrell's portion of the proposed Settlement amount is \$1,605,000 ("EGC Portion") and is being paid for the benefit of Class Members who purchased the Company's common shares during the Class Period (April 5, 2007 through May 18, 2010, inclusive). Defendants Quintanilla, Mendoza, Torres, Berger, and Gonzalez's portion of the proposed

Settlement amount is \$150,000 (“Auditors Portion”) and is being paid for the benefit of Class Members who purchased the Company’s common shares during the period March 26, 2008 through February 19, 2010, inclusive, (“Auditors Sub-Class Period”). Any Class Member who purchased shares of the Company’s common stock during the Auditors Sub-Class Period may be entitled to participate in both the EGC and Auditors portions of the Settlement. Any Class Member who purchased common shares during the Class Period but before March 26, 2008 or after February 19, 2010, may be entitled to participate only in the EGC Portion of the Settlement.

The Claims Administrator shall determine each Authorized Claimant’s *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant’s Recognized Claim. **Please Note:** The Recognized Claim formula, set forth below, is not intended to be an estimate of the amount a Settlement Class Member might have been able to recover after a trial, nor is it an estimate of the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Claim formula is the basis upon which the Net Settlement Fund will be proportionately allocated to the Authorized Claimants. To the extent there are sufficient funds in the Net Settlement Fund, each Authorized Claimant will receive an amount equal to the Authorized Claimant’s Recognized Claim and subject to the provisions in the preceding paragraph. If, however, the amount in the Net Settlement Fund is not sufficient to permit payment of the total Recognized Claim of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant’s Recognized Claim bears to the total Recognized Claims of all Authorized Claimants and subject to the provisions in the preceding paragraph (*i.e.*, “*pro rata* share”). Payment in this manner shall be deemed conclusive against all Authorized Claimants. No distribution will be made on a claim where the potential distribution amount is less than ten dollars (\$10.00) in cash.

If any funds remain in the Net Settlement Fund by reason of uncashed checks, or otherwise, after the Claims Administrator has made reasonable and diligent efforts to have Authorized Claimants who are entitled to participate in the distribution of the Net Settlement Fund cash their distribution checks, then any balance remaining in the Net Settlement Fund six (6) months after the initial distribution of such funds shall be used: (i) first, to pay any amounts mistakenly omitted from the initial distribution to Authorized Claimants or to pay any late, but otherwise valid and fully documented claims received after the cut-off date used to make the initial distribution, provided that such distributions to any late post-distribution claimants meet all of the other criteria for inclusion in the initial distribution, including the \$10.00 minimum check amount set forth in the Notice; (ii) second, to pay any additional Notice and Administration Costs incurred in administering the Settlement; and (iii) finally, to make a second distribution to Authorized Claimants who cashed their checks from the initial distribution and who would receive at least \$10.00 from such second distribution, after payment of the estimated costs or fees to be incurred in administering the Net Settlement Fund and in making this second distribution, if such second distribution is economically feasible. If six (6) months after such second distribution, if undertaken, or if such second distribution is not undertaken, any funds shall remain in the Net Settlement Fund after the Claims Administrator has made reasonable and diligent efforts to have Authorized Claimants who are entitled to participate in this Settlement cash their checks, any funds remaining in the Net Settlement Fund shall be donated to a non-profit charitable organization(s) selected by Class Counsel.

THE BASIS FOR CALCULATING YOUR RECOGNIZED CLAIM:

- (I) **Recognized Claim for the Company’s Common Stock Purchased or Otherwise Acquired During the Class Period will be calculated as follows:**
- (A) For shares purchased or otherwise acquired during the Class Period and sold during the Class Period, the Recognized Claim per share will be the *lesser* of: (1) the inflation per share upon purchase (as set forth in Inflation Table A below) less the inflation per share upon sale (as set forth in Inflation Table A below); or (2) the purchase price per share minus the sales price per share.
 - (B) For shares purchased or otherwise acquired during the Class Period and sold during the period May 19, 2010 to August 16, 2010, inclusive, the Recognized Claim will be the *lesser* of: (1) the inflation per share upon purchase (as set forth in Inflation Table A

below); or (2) the difference between the purchase price per share and the average closing stock price as of date of sale provided in Table B below.

- (C) For shares purchased or otherwise acquired during the Class Period and retained as of the close of trading on August 16, 2010, the Recognized Claim will be the *lesser* of: (1) the inflation per share upon purchase (as set forth in Inflation Table A below); or (2) the purchase price per share minus \$.03¹ per share.

INFLATION TABLE A	
Electronic Game Card Common Stock Purchased or Acquired During the Class Period	
Period	Inflation
April 5, 2007 to February 9, 2010, inclusive	\$.93 per share
February 10, 2010 to March 4, 2010, inclusive	\$.75 per share
March 5, 2010 to March 18, 2010, inclusive	\$.26 per share
March 19, 2010 to May 18, 2010 inclusive	\$.09 per share

TABLE B					
<u>Date</u>	<u>Closing Price</u>	<u>Average Closing Price</u>	<u>Date</u>	<u>Closing Price</u>	<u>Average Closing Price</u>
5/19/2010	\$0.03	\$0.03	7/2/2010	\$0.02	\$0.04
5/20/2010	\$0.03	\$0.03	7/5/2010	\$0.02	\$0.04
5/21/2010	\$0.06	\$0.04	7/6/2010	\$0.03	\$0.04
5/24/2010	\$0.04	\$0.04	7/7/2010	\$0.03	\$0.04
5/25/2010	\$0.04	\$0.04	7/8/2010	\$0.03	\$0.04
5/26/2010	\$0.03	\$0.04	7/9/2010	\$0.02	\$0.04
5/27/2010	\$0.05	\$0.04	7/12/2010	\$0.02	\$0.03
5/28/2010	\$0.05	\$0.04	7/13/2010	\$0.03	\$0.03
5/31/2010	\$0.05	\$0.04	7/14/2010	\$0.02	\$0.03
6/1/2010	\$0.05	\$0.04	7/15/2010	\$0.02	\$0.03
6/2/2010	\$0.05	\$0.04	7/16/2010	\$0.02	\$0.03
6/3/2010	\$0.05	\$0.04	7/19/2010	\$0.01	\$0.03
6/4/2010	\$0.03	\$0.04	7/20/2010	\$0.02	\$0.03
6/7/2010	\$0.04	\$0.04	7/21/2010	\$0.02	\$0.03
6/8/2010	\$0.04	\$0.04	7/22/2010	\$0.01	\$0.03
6/9/2010	\$0.04	\$0.04	7/23/2010	\$0.02	\$0.03
6/10/2010	\$0.03	\$0.04	7/26/2010	\$0.02	\$0.03
6/11/2010	\$0.04	\$0.04	7/27/2010	\$0.02	\$0.03
6/14/2010	\$0.04	\$0.04	7/28/2010	\$0.02	\$0.03

¹ Pursuant to Section 21(D)(e)(1) of the Private Securities Litigation Reform Act of 1995, “in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated.” \$.03 per share was the mean (average) daily closing trading price of Electronic Game Card common stock during the 90-day period beginning on May 19, 2010 and ending on August 16, 2010.

TABLE B (CONTINUED)					
6/15/2010	\$0.03	\$0.04	7/29/2010	\$0.01	\$0.03
6/16/2010	\$0.03	\$0.04	7/30/2010	\$0.02	\$0.03
6/17/2010	\$0.04	\$0.04	8/2/2010	\$0.02	\$0.03
6/18/2010	\$0.04	\$0.04	8/3/2010	\$0.01	\$0.03
6/21/2010	\$0.04	\$0.04	8/4/2010	\$0.01	\$0.03
6/22/2010	\$0.03	\$0.04	8/5/2010	\$0.01	\$0.03
6/23/2010	\$0.03	\$0.04	8/6/2010	\$0.01	\$0.03
6/24/2010	\$0.03	\$0.04	8/9/2010	\$0.01	\$0.03
6/25/2010	\$0.03	\$0.04	8/10/2010	\$0.01	\$0.03
6/28/2010	\$0.03	\$0.04	8/11/2010	\$0.01	\$0.03
6/29/2010	\$0.02	\$0.04	8/12/2010	\$0.01	\$0.03
6/30/2010	\$0.03	\$0.04	8/13/2010	\$0.01	\$0.03
7/1/2010	\$0.03	\$0.04	8/16/2010	\$0.01	\$0.03

To the extent a claimant had a trading gain or “broke even” from his, her or its overall transactions in Electronic Game Card shares during the Class Period, the value of the Recognized Claim will be zero and the claimant will not be entitled to a share of the Net Settlement Fund. To the extent that a claimant suffered a trading loss on his, her or its overall transactions in the Company’s shares during the Class Period, but that trading loss was less than the Recognized Claim calculated above, then the Recognized Claim shall be limited to the amount of the claimant’s actual trading loss.

For purposes of calculating your Recognized Claim, the date of purchase, acquisition or sale is the “contract” or “trade” date and not the “settlement” or “payment” date. The receipt or grant by gift, inheritance or operation of law of Electronic Game Card shares shall not be deemed a purchase, acquisition or sale of Electronic Game Card shares for the calculation of an Authorized Claimant’s Recognized Claim. The covering purchase of a short sale is not an eligible purchase.

For purposes of calculating your Recognized Claim, all purchases, acquisitions and sales shall be matched on a First In First Out (“FIFO”) basis in chronological order. Therefore, on the Proof of Claim enclosed with this Notice, you must provide all of your purchases and acquisitions of Electronic Game Card shares during the time period April 5, 2007 through and including August 16, 2010.

Payment pursuant to the Plan of Allocation approved by the Court shall be conclusive against all Authorized Claimants. No person shall have any claim against Defendants, Defendants’ Counsel, Class Representatives, Class Counsel or the Claims Administrator or other agent designated by Class Counsel based on the distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. Each claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to the claimant’s Claim Form. All persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the claims submitted in connection with the Settlement, or otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund shall be released and discharged from any and all claims arising out of such involvement, and all Settlement Class Members, whether or not they are to receive payment from the Net Settlement Fund, will be barred from making any further claim against the Net Settlement Fund beyond the amount allocated to them as provided in any distribution orders entered by the Court.

c. Are there any further limitations on the amount I may receive?

- i) To the extent there are sufficient funds in the Net Settlement Fund, each Class Member with a Recognized Claim that satisfies the requirements approved by the Court (“Authorized Claimant”) will receive an amount equal to the Authorized Claimant’s Recognized Claim described above. If, however, the amount in the Net Settlement Fund is not sufficient to permit payment of the total Recognized Claim of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant’s Recognized Claim bears to the total of the Recognized Claims of all Authorized Claimants.
- ii) For Class members who conducted multiple transactions in Electronic Game Card Stock during the Class Period, the earliest subsequent sale shall be matched first against those shares in the Claimant’s opening position on the first day of the Class Period, and then matched chronologically thereafter against each purchase made during the Class Period.
- iii) Transactions during the Class Period resulting in a gain shall be netted against the Class Members transactions resulting in a loss to arrive at the Recognized Claim.
- iv) Any Class members whose collective transactions in Electronic Game Card Stock during the Class Period resulted in a net gain shall not be entitled to share in the Net Settlement Fund.
- v) The purchase and sales prices exclude any brokerage commissions, transfer taxes or other fees.
- vi) The covering purchase of a short sale is not an eligible purchase. Gifts and transfers are not eligible purchases.

8. How can I get a payment?

To qualify for a payment, you must send in a form entitled “Proof of Claim and Release” form. This claim form is attached to this Notice. You may also obtain a claim form on the Internet at www.strategicclaims.net. Read the instructions carefully, fill out the form, sign it in the location indicated, and mail the claim form together with all documentation requested in the form, postmarked no later than November 28, 2016, to:

Electronic Game Card Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
P.O. Box 230
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

The Claims Administrator will process your claim and determine whether you are an “Authorized Claimant.”

9. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you will remain in the Class. That means that if the Settlement is approved, you and all Class Members will release (agreeing never to sue, continue to sue, or be part of any other lawsuit) all claims against the Settling Defendants, their current, former, and future legal representatives, attorneys, heirs, successors-in-interest, or assigns, (“Released Parties”) in connection with your acquisition of Electronic Game Card Stock during the Class Period, except that you do not release the Released Parties from any claim or action to enforce the Settlement. It also means that all of the Court’s orders will apply to you and legally bind you. If you sign the claim form, you are agreeing to a “Release of Claims,” which will bar you from ever filing a lawsuit against any Released Party to recover losses from the acquisition or sale of Electronic Game Card Stock during the Class Period, except to enforce the Settlement. That means you will accept a share in the Net Settlement

Fund as sole compensation for any losses you have suffered in the acquisition and sale of Electronic Game Card Stock during the Class Period.

10. How do I get out of the Settlement?

If you do not want to receive a payment from this Settlement, and you want to keep any right you may have to sue or continue to sue the Settling Defendants on your own based on the legal claims raised in this Class Action, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement. To exclude yourself from the Settlement, you must mail a letter stating you want to be excluded as a Class Member from both the Petrie Action and Pace Action. Be sure to include your name, address, telephone number and your signature, along with an accurate list of all of your purchases and sales of Electronic Game Card Stock during the Class Period, and brokerage account statements evidencing your purchases and sales. You must mail your exclusion request, postmarked no later than December 20, 2016, to:

Electronic Game Card Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
P.O. Box 230
Media, PA 19063

You cannot exclude yourself by telephone or by e-mail. If you ask to be excluded, you will not receive a settlement payment, and you cannot object to the Settlement. If you ask to be excluded, you will not be legally bound by anything that happens in this Class Action.

11. If I do not exclude myself, can I sue the Settling Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Settling Defendants for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately, since you may have to exclude yourself from this Class to continue your own lawsuit.

12. Do I have a lawyer in this case?

Yes. The Court appointed The Rosen Law Firm, P.A to represent you and the other Class Members, on July 31, 2015, when it issued an order certifying this action as a class action. These lawyers are called Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense. Contact information for The Rosen Law Firm, P.A. is provided in the response to question 14, below.

13. How will the lawyers be paid?

Class Counsel have expended considerable time litigating this action on a contingent fee basis, and have paid for the expenses of the Litigations themselves and have not been paid attorneys’ fees in advance of this Settlement. Class Counsel have done so with the expectation that if they are successful in recovering money for the Class, they will receive attorneys’ fees and be reimbursed for their litigation expenses from the Settlement Fund, as is customary in this type of litigation. Class Counsel will not receive attorneys’ fees or be reimbursed for their litigation expenses except from the Settlement Fund. Therefore, Class Counsel will file a motion asking the Court at the Settlement Hearing to make an award of attorneys’ fees in an amount not to exceed \$438,750, for reimbursement of reasonable litigation expenses not to exceed \$550,000, and an award to Class Representatives in an amount not to exceed \$5,000 each. The Court may award less than these amounts. Any amounts awarded by the Court will come out of the Settlement Fund.

14. How do I tell the Court that I do not like the Settlement?

You can tell the Court you do not agree with the Settlement, any part of the Settlement, or Class Counsel’s motion for attorneys’ fees, and that you think the Court should not approve the Settlement, by mailing a letter stating that you object to the Settlement in the *Petrie Action* and the *Pace Action*. Be sure to include your name, address, telephone number, your signature, a list of your purchases and

sales of Electronic Game Card Stock in order to show your membership in the Class, and all of the reasons you object to the Settlement. Be sure to mail the objections to the six different places listed below, postmarked no later than December 20, 2016, so the Court will consider your views:

<p>Clerk of the Court United States District Court Central District of California - Southern Division 411 West Fourth Street Santa Ana, California 92701</p>	<p>Laurence M. Rosen, Esq. THE ROSEN LAW FIRM, P.A. 355 South Grand Avenue, Suite 2450 Los Angeles, CA 90071</p> <p><i>Class Counsel for Plaintiffs</i></p>	<p>Jeffrey S. Boxer, Esq. CARTER LEDYARD & MILBURN LLP 2 Wall Street New York, NY 10005</p> <p><i>Counsel for Defendant Estate of Lord Steinberg</i></p>
<p>Jerome S. Fortinsky, Esq. SHEARMAN & STERLING LLP 599 Lexington Avenue New York, NY 10022</p> <p><i>Counsel for Defendants Eugene Christiansen and Kevin Donovan</i></p>	<p>Alexander H. Cote SCHEPER KIM & HARRIS LLP 601 West Fifth Street, 12th Floor Los Angeles, CA 90071-2025</p> <p><i>Counsel for Defendant Paul Farrell</i></p>	<p>John R. Armstrong, Esq. HORWITZ & ARMSTRONG LLP 26475 Rancho Parkway South Lake Forest, CA 92630</p> <p><i>Counsel for Defendants Bill Torres, Cindy E. Gonzalez, Henry Mendoza, James Francis Berger, and Timothy Quintanilla</i></p>

15. What is the difference between objecting and requesting exclusion?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Class. Requesting exclusion is telling the Court you do not want to be part of the Class and Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer concerns you. If you stay in the Class and object, but your objection is overruled, you will not be allowed a second opportunity to exclude yourself.

16. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Settlement Hearing on January 9, 2017, at 8:30 a.m., at the United States District Court for the Central District of California, 411 West Fourth Street, Santa Ana, California 92701.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Settlement. If there are objections, the Court will consider them, and the Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel for attorneys' fees and expenses.

17. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mail your written objection on time, the Court will consider it.

18. What happens if I do nothing at all?

If you do nothing, you will not receive a payment from the Settlement. However, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Settling Defendants about the claims made in this case ever again.

DATED: SEPTEMBER 13, 2016

BY ORDER OF THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

PROOF OF CLAIM AND RELEASE

Deadline for Submission: November 28, 2016

IF YOU PURCHASED THE COMMON STOCK OF ELECTRONIC GAME CARD, INC., DURING THE PERIOD FROM APRIL 5, 2007 THROUGH MAY 18, 2010, INCLUSIVE (THE “CLASS PERIOD”), YOU ARE A “CLASS MEMBER” AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT PROCEEDS.

IF YOU ARE A CLASS MEMBER, YOU MUST COMPLETE AND SUBMIT THIS FORM IN ORDER TO BE ELIGIBLE FOR ANY SETTLEMENT BENEFITS.

YOU MUST COMPLETE AND SIGN THIS PROOF OF CLAIM AND RELEASE (“PROOF OF CLAIM”) AND MAIL IT BY FIRST CLASS MAIL, POSTMARKED NO LATER THAN NOVEMBER 28, 2016 TO STRATEGIC CLAIM SERVICES, THE CLAIMS ADMINISTRATOR, AT THE FOLLOWING ADDRESS:

Electronic Game Card Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
P.O. Box 230
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

YOUR FAILURE TO SUBMIT YOUR CLAIM BY NOVEMBER 28, 2016 WILL SUBJECT YOUR CLAIM TO REJECTION AND PRECLUDE YOUR RECEIVING ANY MONEY IN CONNECTION WITH THE SETTLEMENT OF THIS ACTION. DO NOT MAIL OR DELIVER YOUR CLAIM TO THE COURT OR TO ANY OF THE PARTIES OR THEIR COUNSEL AS ANY SUCH CLAIM WILL BE DEEMED NOT TO HAVE BEEN SUBMITTED. SUBMIT YOUR CLAIM ONLY TO THE CLAIMS ADMINISTRATOR.

CLAIMANT’S STATEMENT

1. I (we) purchased common stock in Electronic Game Card, Inc. (“Electronic Game Card”) and was (were) damaged thereby. (Do not submit this Proof of Claim if you did not purchase Electronic Game Card common stock during the designated Class Period).
2. By submitting this Proof of Claim, I (we) state that I (we) believe in good faith that I am (we are) a Class Member as defined above and in the Notice of Pendency and Settlement of Class Action (the “Notice”), or am (are) acting for such person(s); that I am (we are) not a Defendant in the Actions or anyone excluded from the Class; that I (we) have read and understand the Notice; that I (we) believe that I am (we are) entitled to receive a share of the Net Settlement Fund, as defined in the Notice; that I (we) elect to participate in the proposed Settlement described in the Notice; and that I (we) have not filed a request for exclusion. (If you are acting in a representative capacity on behalf of a Class Member [e.g., as an executor, administrator, trustee, or other representative], you must submit evidence of your current authority to act on behalf of that Class Member. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.)
3. I (we) consent to the jurisdiction of the Court with respect to all questions concerning the validity of this Proof of Claim. I (we) understand and agree that my (our) claim may be subject to

ELECTRONIC GAME CARD LITIGATION

investigation and discovery under the Federal Rules of Civil Procedure, provided that such investigation and discovery shall be limited to my (our) status as a Class Member(s) and the validity and amount of my (our) claim. No discovery shall be allowed on the merits of the Litigation or Settlement in connection with processing of the Proof of Claim.

4. I (we) have set forth where requested below all relevant information with respect to each purchase of Electronic Game Card common stock during the Class Period, and each sale, if any, of such securities. I (we) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so.
5. I (we) have enclosed photocopies of the stockbroker's confirmation slips, stockbroker's statements, or other documents evidencing each purchase, sale or retention of Electronic Game Card common stock listed below in support of my (our) claim. (IF ANY SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN A COPY OR EQUIVALENT DOCUMENTS FROM YOUR BROKER BECAUSE THESE DOCUMENTS ARE NECESSARY TO PROVE AND PROCESS YOUR CLAIM.)
6. I (we) understand that the information contained in this Proof of Claim is subject to such verification as the Claims Administrator may request or as the Court may direct, and I (we) agree to cooperate in any such verification. (The information requested herein is designed to provide the minimum amount of information necessary to process most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your recognized claim. In some cases, the Claims Administrator may condition acceptance of the claim based upon the production of additional information, including, where applicable, information concerning transactions in any derivatives securities such as options.)
7. Upon the occurrence of the Court's approval of the Settlement, as detailed in the Notice, I (we) agree and acknowledge that my (our) signature(s) hereto shall effect and constitute a full and complete release, remise and discharge by me (us) and my (our) heirs, joint tenants, tenants in common, beneficiaries, executors, administrators, predecessors, successors, attorneys, insurers and assigns (or, if I am (we are) submitting this Proof of Claim on behalf of a corporation, a partnership, estate or one or more other persons, by it, him, her or them, and by its, his, her or their heirs, executors, administrators, predecessors, successors, and assigns) of each of the "Released Parties" of all "Release of Claims," as defined in the Notice.
8. NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All Claimants MUST submit a manually signed paper Proof of Claim form listing all their transactions whether or not they also submit electronic copies. If you wish to file your claim electronically, you must contact the Claims Administrator at 1-866-274-4004 or visit their website at www.strategicclaims.net to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

ELECTRONIC GAME CARD LITIGATION

I. CLAIMANT INFORMATION

Name		
Address		
City	State	ZIP
Foreign Province	Foreign Country	
Day Phone	Evening Phone	
Email		
Social Security Number (for individuals):	OR	Taxpayer Identification Number (for estates, trusts, corporations, etc.):

II. SCHEDULE OF TRANSACTIONS IN ELECTRONIC GAME CARD SECURITIES

Beginning Holdings:

A. State the total number of shares of Electronic Game Card common stock owned at the close of trading on April 4, 2007, long or short (*must be documented*).

Purchases:

B. Separately list each and every open market purchase of Electronic Game Card common stock during the period from April 5, 2007 through August 16, 2010, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically) (Month/Day/Year)	Number of Shares Purchased	Price per Share	Total Cost (Excluding Commissions, Taxes, and Fees)

ELECTRONIC GAME CARD LITIGATION

Sales:

C. Separately list each and every sale of Electronic Game Card common stock during the period from April 5, 2007 through August 16, 2010, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Price per Share	Amount Received (Excluding Commissions, Taxes, and Fees)

Ending Holdings:

D. State the total number of shares of Electronic Game Card common stock owned at the close of trading on August 16, 2010, long or short (*must be documented*).

--

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification number at the top of each sheet.

III. SUBSTITUTE FORM W-9

Request for Taxpayer Identification Number:

Enter taxpayer identification number below for the Beneficial Owner(s). For most individuals, this is your Social Security Number. The Internal Revenue Service (“I.R.S.”) requires such taxpayer identification number. If you fail to provide this information, your claim may be rejected.

Social Security Number (for individuals)	Or	Taxpayer Identification Number (for estates, trusts, corporations, etc.)

IV. CERTIFICATION

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the I.R.S. that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the I.R.S. has notified me (us) that I am (we are) no longer subject to backup withholding.

NOTE: If you have been notified by the I.R.S. that you are subject to backup withholding, please strike out the language that you are not subject to backup withholding in the certification above.

ELECTRONIC GAME CARD LITIGATION

UNDER THE PENALTIES OF PERJURY UNDER THE LAWS OF THE UNITED STATES, I (WE) CERTIFY THAT ALL OF THE INFORMATION I (WE) PROVIDED ON THIS PROOF OF CLAIM AND RELEASE FORM IS TRUE, CORRECT AND COMPLETE.

Signature of Claimant (If this claim is being made on behalf of Joint Claimants, then each must sign):

(Signature)

(Signature)

(Capacity of person(s) signing, e.g. beneficial purchaser(s), executor, administrator, trustee, etc.)

Check here if proof of authority to file is enclosed.
(See Item 2 under Claimant's Statement)

Date: _____

THIS PROOF OF CLAIM MUST BE POSTMARKED NO LATER THAN NOVEMBER 28, 2016 AND MUST BE MAILED TO:

Electronic Game Card Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
P.O. Box 230
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

A Proof of Claim received by the Claims Administrator shall be deemed to have been submitted when posted, if mailed by November 28, 2016 and if a postmark is indicated on the envelope and it is mailed first class and addressed in accordance with the above instructions. In all other cases, a Proof of Claim shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to process fully all of the Proofs of Claim and to administer the Settlement. This work will be completed as promptly as time permits, given the need to investigate and tabulate each Proof of Claim. Please notify the Claims Administrator of any change of address.

Electronic Game Card Litigation
c/o Strategic Claims Services
600 N Jackson Street – Suite 3
Media, PA 19063

IMPORTANT LEGAL DOCUMENT – PLEASE FORWARD

REMINDER CHECKLIST

- Please be sure to sign this Proof of Claim on page 15. If this Proof of Claim is submitted on behalf of joint claimants, then both claimants must sign.
- Please remember to attach supporting documents. Do NOT send any stock certificates. Keep copies of everything you submit.
- Do NOT use highlighter on the Proof of Claim or any supporting documents.
- If you move after submitting this Proof of Claim, please notify the Claims Administrator of the change in your address.