

Dear Investor:

You are listed as an investor in Tibet Pharmaceuticals, Inc. stock. Enclosed is a notice about the settlement of a class action lawsuit called *Dartell, v. Tibet Pharmaceuticals, Inc., et al*, Civil Action No. 14-3620-JMV-JBC. You may be eligible to claim a payment from the settlement, or you may want to act on other legal rights. Important facts are highlighted below and explained in the notice:

- **Security:** Tibet Pharmaceutical, Inc. common stock (CUSIP: G88615102; G80649109)
- **Time Period:** Tibet stock bought from January 24, 2011 to April 3, 2012
- **Settlement Amount:** \$2,075,000 for investors (14 cents per share if claims are submitted for each share).
- **Reasons for Settlement:** Avoids costs and risks from continuing the lawsuit; pays money to investors like you; and releases Acquavella, Chiarelli, Shuster, & Berkower LLP from liability.
- **If the Case had not Settled:** There would have been a trial. Plaintiffs think they would have won \$1.11 per share if they won at trial. The Defendants think that Plaintiffs would not have won anything from a trial.
- **Attorneys' Fees and Expenses:** Court-appointed lawyers for investors will ask the Court for up to \$871,667 (\$0.058 per share), to be paid from the Settlement Fund, as fees, expenses and awards to Lead Plaintiffs for investigating the facts, litigation the case, and negotiating the settlement.
- **Deadlines:**
Claims: February 27, 2017
Exclusions: May 16, 2017
Objections: May 23, 2017
Court Hearing on Fairness of Settlement: June 6, 2017
- **More Information:** www.strategicclaims.net OR:

<p><u>Claims Administrator:</u> Tibet Litigation c/o Strategic Claims Services P.O. Box 230 600 N. Jackson St., Ste. 3 Media, PA 19063 Tel.: 866-274-4004 info@strategicclaims.net</p>		<p><u>Counsel for Plaintiffs:</u> THE ROSEN LAW FIRM, P.A. 275 Madison Avenue, 34th Floor New York, New York 10016 Tel.: 212-686-1060 info@rosenlegal.com</p>
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Get more details in the enclosed Notice from the United States District Court for the District of New Jersey.

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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ROBIN JOACHIM DARTELL, et al.,
Individually and on Behalf of All Others
Similarly Situated

Plaintiff,

:
:
Civil Action No. 14-CV-3620-JMV-
JBC

VS.

TIBET PHARMACEUTICALS, INC., et al
Defendant.

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

IF YOU PURCHASED OR OTHERWISE ACQUIRED THE COMMON STOCK (“STOCK”) OF TIBET PHARMACEUTICALS, INC. (“TIBET” OR THE “COMPANY”) PURSUANT AND/OR TRACEABLE TO TIBET’S REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH TIBET’S INITIAL PUBLIC OFFERING OF STOCK ON OR ABOUT JANUARY 24, 2011 (THE “IPO”); OR PURCHASED OR OTHERWISE ACQUIRED TIBET COMMON STOCK FROM JANUARY 24, 2011 TO APRIL 3, 2012, INCLUSIVE (THE “CLASS PERIOD”), YOU ARE A “CLASS MEMBER” AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT PROCEEDS (THE “SETTLEMENT”).

Under law, a federal court has authorized this notice.

THIS NOTICE EXPLAINS IMPORTANT RIGHTS YOU MAY HAVE, INCLUDING YOUR POSSIBLE RECEIPT OF CASH FROM THE SETTLEMENT. YOUR LEGAL RIGHTS ARE AFFECTED WHETHER YOU DO OR DO NOT ACT. ACCOMPANYING THIS NOTICE IS A CLASS ACTION PROOF OF CLAIM AND RELEASE (“PROOF OF CLAIM” OR “CLAIM FORM”). IN ORDER TO PARTICIPATE IN THE SETTLEMENT, YOU MUST MAIL THE COMPLETED AND SIGNED CLAIM FORM BY FIRST-CLASS MAIL, RECEIVED NO LATER THAN FEBRUARY 27, 2017 ADDRESSED TO THE CLAIMS ADMINISTRATOR AT:

Tibet Litigation
c/o Strategic Claims Services
P.O. Box 230
600 North Jackson Street, Suite 3
Media, PA 19063

FOR THOSE CLASS MEMBERS WHO SUBMITTED A VALID AND TIMELY PROOF OF CLAIM AND RELEASE FORM IN THE SETTLEMENT WITH ANDERSON & STRUDWICK, INC. WHICH WAS APPROVED BY THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA ON MARCH 14, 2016 (THE “ANDERSON & STRUDWICK SETTLEMENT”), THAT PROOF OF CLAIM AND RELEASE FORM WILL SERVE AS YOUR PROOF OF CLAIM AND RELEASE FORM IN THIS SETTLEMENT AND YOU ARE AUTOMATICALLY ELIGIBLE FOR A RECOVERY IN THIS SETTLEMENT

WITHOUT NEEDING TO SUBMIT ANOTHER PROOF OF CLAIM AND RELEASE FORM, YOU CAN CONTACT THE CLAIMS ADMINISTRATOR AT (866) 274-4004 TO FIND OUT IF YOU PREVIOUSLY SUBMITTED IN THE PREVIOUS SETTLEMENT AND WHETHER IT WAS VALID OR DEFICIENT.

FOR THOSE CLASS MEMBERS WHO DID NOT SUBMIT A VALID AND TIMELY PROOF OF CLAIM AND RELEASE FORM IN THE ANDERSON & STRUDWICK SETTLEMENT TO RECOVER AS A CLASS MEMBER BASED ON YOUR CLAIM IN THE ACTION (THE “TIBET LITIGATION”) YOU MUST COMPLETE AND ON PAGE 15 HEREOF, SIGN THIS PROOF OF CLAIM AND RELEASE FORM AND SUBMIT THE REQUESTED DOCUMENTATION.

FOR THOSE CLASS MEMBERS WHO DID NOT SUBMIT A VALID AND TIMELY PROOF OF CLAIM AND RELEASE FORM IN THE ANDERSON & STRUDWICK SETTLEMENT, SUBMITTING A PROOF OF CLAIM FORM IN THIS SETTLEMENT DOES NOT ENTITLE YOU TO A RECOVERY IN THE ANDERSON & STRUDWICK SETTLEMENT.

TO ACCESS THE STIPULATION AND AGREEMENT OF SETTLEMENT (“SETTLEMENT AGREEMENT” OR “STIPULATION”), COMPLAINT AND OTHER KEY LITIGATION DOCUMENTS IN THE CASE PLEASE VISIT WWW.STRATEGICCLAIMS.NET. THE CLAIMS ADMINISTRATOR WILL POST ANY RELEVANT CHANGES CONCERNING THE DATES PROVIDED IN THIS NOTICE ON WWW.STRATEGICCLAIMS.NET.

PLEASE READ THIS NOTICE CAREFULLY!

- If approved by the Court, the Settlement will provide \$2,075,000 plus interest (the “Settlement Amount”), to pay claims of investors who purchased Tibet Stock during the period from January 24, 2011 through and including April 3, 2012 (the “Class Period”).
- The Settlement represents an average recovery of \$0.14 per share of Tibet Stock for the 14,845,834 shares outstanding as of April 3, 2012, the end of the Class Period. A share may have been traded more than once during the Class Period. This estimate solely reflects the average recovery per outstanding share of Tibet 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 Tibet Stock and the total number and amount of claims filed.
- Attorneys for the Class Plaintiffs (“Plaintiffs’ Counsel”) intends to ask the Court to award them fees of not more than one third of the Settlement Amount or \$691,667, reimbursement of total litigation expenses of no more than \$150,000, and an award to the Class Plaintiffs not to exceed \$30,000 (or \$5,000 for each of the six Class Plaintiffs). Collectively, the attorneys’ fees and expenses are estimated to average \$0.058 per share of Tibet Stock. If approved by the Court, these amounts will be paid from the Settlement Fund.
- The settlement administrator (the “Claims Administrator”) estimates that its fees will be approximately \$50,000. This is an estimate that may increase or decrease depending upon the actual amounts which are not available at the current time.
- The approximate recovery, after deduction of Plaintiffs’ Counsel’s attorneys’ fees and expenses approved by the Court, is an average of \$0.081 per share of Tibet Stock. This estimate is based on the assumptions set forth in the preceding paragraphs. 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 lawsuit concerning whether Tibet’s auditor, Acquavella, Chiarelli, Shuster, Berkower & Co., LLP (“ACSB”) violated federal securities laws under the Securities Act by issuing false audit reports with respect to Tibet’s financial statements contained in the initial public offering prospectus for Tibet’s January 24, 2011 initial public offering (“IPO”) which misrepresented Tibet as financially sound and profitable company. Plaintiffs alleged that ACSB served as Tibet’s auditor and failed to conduct a proper audit of Tibet’s IPO financial statements which misrepresented Tibet as a financially sound and profitable company, when in reality, at the time of the IPO Tibet had defaulted on a \$4.54 million loan which was secured by Tibet’s operating assets.
- 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 FEBRUARY 27, 2017	The only way to get a payment.
EXCLUDE YOURSELF NO LATER THAN MAY 16, 2017	Get no payment. This is the only option that allows you to be part of any other lawsuit against the Debtor about the legal claims in this case.
OBJECT NO LATER THAN MAY 23, 2017	Write to the Court about why you do not like the settlement.
GO TO A HEARING ON JUNE 6, 2017	Speak in Court about the fairness of the settlement.
DO NOTHING	Get no payment. Give up rights.

The Dates above are subject to change. Please review the Claims Administrator’s website at www.strategicclaims.net to determine if there have been any changes to the dates provided.

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:

Tibet Litigation c/o Strategic Claims Services P.O. Box 230 600 N. Jackson St., Ste. 3 Media, PA 19063 Tel.: 866-274-4004 Fax: 610-565-7985 info@strategicclaims.net	or	THE ROSEN LAW FIRM, P.A. 275 Madison Avenue, 34 th Floor New York, New York 10016 Tel.: 212-686-1060 Fax: 212-202-3827 info@rosenlegal.com
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COMMON QUESTIONS AND ANSWERS CONCERNING THE SETTLEMENT

1. Why did I get this Notice?

You or someone in your family may have acquired Tibet Stock during the Class Period.

2. What is this lawsuit about?

The case is known as Dartell v. Tibet Pharmaceuticals, Inc. et al., Case No. 14-3620-JMV-JBC the (“Tibet Class Action”) and the Court in charge of this case is the United States District Court for the District of New Jersey.

Defendants in the Tibet Class Action are Tibet Pharmaceuticals, Inc., Hong Yu, Taylor Guo, Sabrina Ren, Wenbo Chen, Youhang Peng, Solomon Chen, Hayden Zou and L. McCarthy Downs, III, Acquavella, Chiarelli, Shuster & Berkower, LLP (“Current Defendants”) and Sterne Agee Group, Inc. and Anderson & Strudwick, Inc. (“Settled Defendants”). This settlement only resolves the Tibet Class Action with respect to ACSB. The case is continuing on as to all of the Current Defendants except for ACSB. The Settled Defendants’ claims were resolved in connection with the Anderson & Strudwick Settlement.

This Action arises from Tibet’s allegedly false and misleading financial statements in its registration statement and prospectus issued in the initial public offering of Tibet stock on January 24, 2011. The Complaint asserts claims under Sections 11, 12, and 15 of the Securities Act of 1933. Tibet’s financial statements were allegedly misstated because they failed to disclose the existence of several large loans on their balance sheet, that the loans were in default and that Tibet was insolvent at the time of the IPO. The Complaint alleged that Tibet’s auditor, ACSB failed to conduct a proper audit of Tibet’s financial statements contained in the IPO registration statement. ACSB denies that it did anything wrong. The Complaint also alleged that Tibet’s underwriter, Anderson & Strudwick, Inc., and its lead underwriter, L. McCarthy Downs and board advisor Hayden Zou failed to conduct proper due diligence in connection with the Tibet IPO. The Complaint also alleged that Sterne Agee Group, Inc. is the successor-in-interest to Anderson & Strudwick, Inc. In sum, the Complaint alleges that all of the Defendants are liable for damages resulting from the allegedly materially false and misleading statements contained in Tibet’s IPO Registration Statement. The claims against Anderson & Strudwick and Sterne Agee have been resolved in bankruptcy court and class members were previously notified of that partial settlement. The claims against Downs and Zhou are continuing in this action.

3. Why is this a class action?

In a class action, one or more persons and/or entities, called Lead Plaintiff(s), 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.

4. Why is there a Settlement?

Class Plaintiffs and ACSB have both conducted an investigation relating to the claims and the underlying events and transactions alleged in the Tibet Class Action and agree that it is in their respective best interest to settle the claims asserted in the Tibet Class Action.

This matter has not gone to trial and the Court has not decided in favor of either Class Plaintiffs or ACSB. Class Plaintiffs believe they could have won \$1.11 per share if they succeeded at trial. ACSB thinks Class Plaintiffs would not have won anything from a trial. ACSB thinks that even if Class Plaintiffs had won at trial they would have won at most \$0.40 per share. Plaintiffs and ACSB disagree as to the maximum amount of recoverable damages because ACSB thinks that it could have shown that Plaintiffs’ stock losses were attributable to something other than the alleged ACSB misstatement and that because by the time there was any corrective disclosure

concerning ACSB Tibet's stock had already dropped to below \$2.00 per share. Plaintiffs believe that ACSB would not have been able to establish that the stock losses were attributable to something other than ACSB's alleged misstatement and that ACSB would therefore be responsible for the entire diminution in the price of Tibet stock of \$5.50 per share at the time of the IPO to nearly zero. But there was no trial. Instead, Plaintiffs, and ACSB have agreed to settle the Tibet Class Action. The Class Plaintiffs and Plaintiffs' Counsel believe the settlement is best for all Class Members because of the risks associated with continued litigation against ACSB.

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 Tibet Stock during the period from January 24, 2011 through and including April 3, 2012.

6. Are there exceptions to being included?

Yes. You are not a Class Member if you are a Defendant, a member of any Defendant's immediate family, an entity in which any Defendant has a controlling interest, a director or officers of Tibet, or an affiliate, legal representative, heir, predecessor, successor or assign of any such excluded party. Also, if you timely and validly 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 will create a Settlement Fund comprised of \$2,075,000 (two million seventy-five thousand dollars) in cash plus interest earned from the time of funding of the Settlement through the time of distribution to Class Members. In particular, the Settlement will create a Settlement Fund to pay claims of investors who purchased or otherwise acquired the common stock of Tibet during the period from January 24, 2011 through and including April 3, 2012, inclusive, and who have been damaged thereby.

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 awards 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 Tibet 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 Loss") of each Authorized Claimant is calculated based upon the measure of damages provided in the securities laws with the goal of reimbursing Class members in a fair and reasonable manner. Damages in cases arising under Section 11 of the Securities Act, like this case, are calculated by taking the difference between how much an individual paid for Tibet stock (but not exceeding the price at the time of Tibet's IPO, which was \$5.50/share) and: 1) the value of the stock at the time this lawsuit was brought, or 2) the price of the stock at the time it was sold before the lawsuit was brought, or 3) the price of the stock when it was sold after the lawsuit was brought, but before a judgment (if that amount is less than the

difference between the purchase amount and the price at the time the suit was brought). The Recognized Loss formulas provide all Class Members a pro rata share of the Settlement funds and Authorized Claimants cannot recover more than their out-of-pocket losses.

The Recognized Loss of each Authorized Claimant shall be calculated according to the following formula:

- I) For each share of Tibet common stock purchased or otherwise acquired during the Class Period and sold on or before the close of trading on April 3, 2012, the Recognized Loss Per Share is the difference between the purchase price, not to exceed the offering price of \$5.50 per share, and the sales price for each share sold.
- II) For each share of Tibet common stock purchased or otherwise acquired during the Class Period and held as of the close of trading on April 3, 2012, the Recognized Loss Per Share is the difference between the purchase price, not to exceed the offering price of \$5.50 per share, and \$.17 per share.¹

To the extent a claimant had a trading gain or “broke even” from his, her or its overall transactions in Tibet Stock during the Class Period, the value of the Recognized Loss 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 Tibet Stock during the Class Period, but that trading loss was less than the Recognized Loss calculated above, then the Recognized Loss shall be limited to the amount of the claimant’s actual trading loss. A Recognized Loss that calculates to yield a negative number is treated as a Recognized Loss of zero.

The Claims Administrator shall determine each Authorized Claimant’s *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant’s Recognized Loss. The Recognized Loss formula is not intended to be an estimate of the amount a 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 Loss formula is the basis upon which the Net Settlement Fund will be proportionately allocated to the Authorized Claimants.

The date of purchases or sale is the “contract” or “trade” date as distinguished from the “settlement” date. Therefore, you need to list all your purchases and sales of Tibet Stock during the period January 24, 2011 to April 3, 2012, both dates inclusive. Each claimant is deemed to have submitted to the jurisdiction of the Court with respect to the claimant’s claim, and, if good cause appears therefor, the claim will be subject to investigation and discovery under the Federal Rules of Civil Procedure, provided that such investigation and discovery shall be limited to that claimant’s status as a Class Member and the validity and amount of that claimant’s claim. No discovery shall be allowed on the merits of the Action.

All Class Members whose claims are not approved by the Court will be barred from participating in distributions from the Net Settlement Fund, but otherwise shall be bound by all of the terms of the Settlement, including the terms of the Order and Final Judgment to be entered in the Action and will be barred from bringing any Released Claim against any Released Parties, including Unknown Claims (as those terms are defined in the Settlement Agreement, which is available on the Internet at www.strategicclaims.net, or through the mail upon request to the Claims

¹ This represents the closing price of Tibet’s common stock on May 29, 2012, the first full trading day after the initial suit was brought.

Administrator). The Plan of Allocation is subject to Court approval and may be modified 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 Loss that satisfies the requirements approved by the Court (“Authorized Claimant”) will receive an amount equal to the Authorized Claimant’s Recognized Loss described above. If, however, as expected, the amount in the Net Settlement Fund is not sufficient to permit payment of the total Recognized Loss of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant’s Recognized Loss bears to the total of the Recognized Losses of all Authorized Claimants.
- ii) For Class members who conducted multiple transactions in Tibet 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) The purchase and sale prices exclude any brokerage commissions, transfer taxes or other fees.
- iv) 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?

If you wish to remain a Class Member and you did not submit a valid and timely Proof of Claim and Release Form in the Anderson & Strudwick Settlement you may be eligible to share in the proceeds of the Settlement, provided that you send in a form entitled “Class Action 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, received no later than **February 27, 2017**, to:

Tibet Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 3
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.”

If you do not know whether you submitted a valid and timely proof of claim in the Anderson & Strudwick Settlement, please contact the Claims Administrator at (866) 274-4004.

The Claims Administrator will make all efforts to obtain the updated address information for any claims returned by the postal service as undeliverable and will re-mail the claims to the

appropriate updated addresses. Claims that are submitted late because they were re-mailed will not be considered untimely provided that they are received no later than 60 calendar days after the date they are re-mailed.

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 ACSB and any and all of ACSB's former officers, directors, principals, shareholders, members, agents (acting in their capacity as agents), employees, attorneys, trustees, insurers (including each of ACSB's insurers' respective businesses, affiliates, subsidiaries, parents and affiliated corporations, divisions, predecessors, shareholders, partners, joint venturers, principals, insurers, reinsurers, successors and assigns, and their respective past, present and future employees, officers, directors, attorneys, and representatives, if any, and all of them), reinsurers, advisors, and the current and former legal representatives of ACSB. You do not release the released parties from any claim or action to enforce the Settlement.

You also do not release Tibet, L. McCarthy Downs, Hayden Zou, Hong Yu, Taylor Z. Guo, Sabrina Y. Ren, Wenbo Chen, Youhang Peng, and Solomon Chen. 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 Tibet 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 Tibet 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 ACSB 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 Dartell v. Tibet Pharmaceuticals, Inc. et al., Case No. 14-cv-3620-JMV-JBC. 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 Tibet Stock during the Class Period, including the dates, the number of shares, and the price of the shares purchased or sold and include supporting documentation substantiating such purchases and sales. You must mail your exclusion request, so that it is received no later than May 16, 2017, to:

Tibet Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
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 ACSB for the same thing later?

No. Unless you exclude yourself, you give up any right to sue ACSB 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?

The Court has certified this action as a class action and has named The Rosen Law Firm, P.A. as Lead Counsel for the Class, to represent you and other Class Members. These lawyers are called Class Counsel. The Rosen Law Firm, P.A. represents all Class Members and has a duty to act in the best interests of all Class Members.

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 litigation 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 one third of the Settlement Fund or \$691,667, for reimbursement of reasonable litigation expenses not to exceed \$150,000 and an award to the Class Plaintiffs in an amount not to exceed \$30,000 each (\$5,000 to each of the Class Plaintiffs). 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 matter of Dartell v. Tibet Pharmaceuticals, Inc., et al., Case No. 14-cv-3620-JMV-JBC. Be sure to include your name, address, telephone number, your signature, a list of your purchases and sales of Tibet 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 three different places listed below, received no later than **May 23, 2017** so the Court will consider your views:

Clerk of the Court Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101 <i>Clerk of the Court</i>	Laurence M. Rosen, Esq. THE ROSEN LAW FIRM, P.A. 275 Madison Avenue, 34 th Floor New York, NY 10016 <i>Class Counsel</i>	William J. Kelly, Esq. WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP 1133 Westchester Avenue White Plains, NY 10604 <i>Counsel for Defendant ACSB</i>
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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 **June 6, 2017 at 11:30 a.m.**, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Newark, NJ 07101, in Courtroom PO 03, before the Honorable John Michael Vasquez, United States District Judge.

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 ACSB about the claims made in this case ever again.

DATED: DECEMBER 19, 2016.

BY ORDER OF THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW JERSEY

CLASS ACTION PROOF OF CLAIM AND RELEASE

Deadline for Submission: February 27, 2017

THIS PROOF OF CLAIM IS ONLY TO BE USED BY CLAIMANTS WHO DID NOT SUBMIT A TIMELY CLAIM IN CONNECTION WITH THE PRIOR TIBET SETTLEMENT (THE “ANDERSON & STRUDWICK SETTLEMENT”). CLAIMANTS WHO SUBMITTED TIMELY CLAIMS IN CONNECTION WITH THE ANDERSON & STRUDWICK SETTLEMENT ARE AUTOMATICALLY INCLUDED AS CLASS MEMBERS IN THIS MATTER UNLESS THEY CHOOSE TO OPT-OUT. IF YOU DID SUBMIT A CLAIM IN CONNECTION WITH THE ANDERSON & STRUDWICK SETTLEMENT, PLEASE DO NOT DO SO AGAIN. YOU CAN CALL THE CLAIMS ADMINISTRATOR IF YOU ARE UNSURE.

IF YOU PURCHASED OR OTHERWISE ACQUIRED THE COMMON STOCK OF TIBET PHARMACEUTICALS, INC. (“TIBET”) PURSUANT AND/OR TRACEABLE TO TIBET’S REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH TIBET’S INITIAL PUBLIC OFFERING OF STOCK ON OR ABOUT JANUARY 24, 2011 (THE “IPO”); OR PURCHASED OR OTHERWISE ACQUIRED TIBET COMMON STOCK FROM JANUARY 24, 2011 TO APRIL 3, 2012, 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 AND DID NOT PREVIOUSLY SUBMIT A CLAIM IN THE PRIOR ANDERSON & STRUDWICK SETTLEMENT, YOU MUST COMPLETE AND SUBMIT THIS FORM IN ORDER TO BE ELIGIBLE FOR ANY SETTLEMENT BENEFITS.

YOU MUST COMPLETE AND SIGN THIS CLASS ACTION PROOF OF CLAIM AND RELEASE (“PROOF OF CLAIM”) AND MAIL IT BY FIRST CLASS MAIL, RECEIVED NO LATER THAN FEBRUARY 27, 2017 TO STRATEGIC CLAIMS SERVICES, THE CLAIMS ADMINISTRATOR, AT THE FOLLOWING ADDRESS:

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

YOUR FAILURE TO SUBMIT YOUR CLAIM BY FEBRUARY 27, 2017 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 Tibet and was (were) damaged thereby. (Do not submit this Proof of Claim if you did not purchase Tibet 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 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 this Proof of Claim.
4. I (we) have set forth where requested below all relevant information with respect to each purchase of Tibet’s 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 Tibet 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 loss. 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 “Released Claims,” as defined in the Stipulation.
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.

I. CLAIMANT INFORMATION

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

Did you previously submit a claim in the Anderson & Strudwick Settlement? Yes [] No []

II. SCHEDULE OF TRANSACTIONS IN TIBET COMMON STOCK**Purchases:**

A. Separately list each and every purchase of Tibet common stock purchased pursuant and/or traceable to Tibet's IPO or purchased during the period from January 24, 2011 to April 3, 2012, 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)

Sales:

B. Separately list each and every sale of Tibet common stock during the period from January 24, 2011 to April 3, 2012 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:

C. State the total number of shares of Tibet common stock owned at the close of trading on April 3, 2012, long or short (*must be documented*).

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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.

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 CLASS ACTION 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 SUBMITTED NO LATER THAN FEBRUARY 27, 2017 AND MUST BE MAILED TO:

Tibet Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 3
Media, PA 19063
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A Proof of Claim received by the Claims Administrator shall be deemed to have been submitted if received by February 27, 2017.

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.

REMINDER CHECKLIST

- Please be sure to sign this Proof of Claim above. 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.

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Notice to those who bought Tibet Pharmaceuticals, Inc. Stock between 1/24/2011 and 4/3/2012

If you bought Tibet Pharmaceuticals, Inc. Stock Between 1/24/2011 and 4/3/2012, you could get a payment from a class action settlement.