

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

Read this Notice carefully as it may affect your legal rights

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

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

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

The settlement of the Class Action (“Agreement”), without any admission of liability on the part of the Defendants, was approved by the Honourable Justice Suzanne Curchesne of the Superior Court of Québec on July 8, 2020. The Defendants have denied and continue to deny each and all of the claims and allegations of wrongdoing made by the Plaintiff in the Class Action. This notice provides a summary of the Agreement.

## THE AUTHORIZATION JUDGMENT

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

***Pierre Derome***

**v.**

***The Stars Group Inc. et al.***

The Class is defined as follows:

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

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

## THE NATURE OF THE CLAIMS ASSERTED

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

The Defendants contest the allegations in the Class Action. This Notice does not mean that the

Court has found liability or a likelihood of recovery on the part of any Class Member. The Defendants have denied and continue to deny each and all of the claims and allegations of wrongdoing made by the Plaintiff in the Class Action.

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

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

#### **SUMMARY OF THE SETTLEMENT TERMS**

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

#### **LAWYERS’ FEES, DISBURSEMENTS AND TAXES**

Legal fees have been approved by the Superior Court of Québec in the amount of 25% of the Settlement Amount, plus disbursements, plus taxes.

#### **CLAIM FOR COMPENSATION**

Each Class Member must submit a completed claim form on or before November 18, 2020, in order to participate in the settlement. The claim form can be accessed at <http://amayasecuritiessettlementcanada.com> or obtained by calling the Administrator at, 1-(866) 329-7153 or by email at [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca).

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

If you do not submit a completed claim form by **November 18, 2020**, you will not receive any part of the net Settlement Amount.

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

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

**Trilogy Class Action Services  
117 Queen Street, P.O. Box 1000,  
Niagara-on-the-Lake, ON, Canada  
Tel: 1-866-329-7153**

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

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

#### **ADDITIONAL INFORMATION**

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

and/or

[www.amayasecuritiessettlementcanada.com](http://www.amayasecuritiessettlementcanada.com).

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

Shawn Faguy

Faguy & Co.

329 de la Commune St. W., Suite 200

Montréal, Quebec H2Y 2E1

Tel: 514-285-8100 ext. 225

Email: [classactions@faguyco.com](mailto:classactions@faguyco.com)

or

Eli Karp

Morganti & Co., P.C.

21 St. Clair Ave, Suite 1102

Tel: 647-344-1900 x2

Toronto, Ontario M4T 1L9

Email : [ekarp@morgantico.com](mailto:ekarp@morgantico.com)

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

#### **NOTICE TO BROKERAGE FIRMS**

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

Trilogy Class Action Services

Amaya Securities Class Action Settlement

117 Queen Street, P.O. Box 1000,

Niagara-on-the-Lake, ON, Canada

Tel: 1-866-329-7153

Email: [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca)

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

