

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

DENNIS MARC AUDET, MICHAEL
PFEIFFER, and DEAN ALLEN SHINNERS,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

STUART A. FRASER, GAW MINERS, LLC,
and ZENMINER, LLC, (d/b/a ZEN CLOUD),

Defendants.

Case 3:16-cv-00940

Hon. Michael P. Shea
Courtroom 3

ECF Case

CLASS ACTION

**DECLARATION OF MORGAN KIMBALL REGARDING
NOTICE PROGRAM COMPLETION**

I, Morgan Kimball, hereby declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I have six years of experience handling all aspects of settlement administration. The statements of fact in this declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.

2. Epiq was appointed as the Settlement Administrator pursuant to the Court’s Amended Preliminary Approval Order (the “Order”) dated March 1, 2023, and in accordance with the Joint Stipulation and Settlement Agreement dated December 16, 2022 (the “Agreement”).¹ I submit this Declaration in order to advise the Parties and the Court regarding the implementation

¹ All capitalized terms not otherwise defined in this document shall have the same meanings ascribed to them in the Agreement.

of the Court-approved Notice Program, and to report on Epiq's handling to date of the settlement administration, in accordance with the Order and the Agreement.

3. Epiq was established in 1968 as a client services and data processing company. Epiq has administered bankruptcies since 1985 and settlements since 1993. Epiq has routinely developed and executed notice programs and administrations in a wide variety of mass action contexts including settlements of consumer, antitrust, products liability, and labor and employment class actions, settlements of mass tort litigation, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 4,500 settlements, including some of the largest and most complex cases ever settled. Epiq's class action case administration services include administering notice requirements, designing direct-mail notices, implementing notice fulfillment services, coordinating with the United States Postal Service ("USPS"), developing and maintaining notice websites and dedicated telephone numbers with recorded information and/or live operators, processing exclusion requests, objections, claim forms and correspondence, maintaining class member databases, adjudicating claims, managing settlement funds, and calculating claim payments and distributions. As an experienced neutral third-party administrator working with settling parties, courts, and mass action participants, Epiq has handled hundreds of millions of notices, disseminated hundreds of millions of emails, handled millions of phone calls, processed tens of millions of claims, and distributed hundreds of billions in payments.

OVERVIEW OF ADMINISTRATION

4. Pursuant to the Agreement and Order, Epiq was appointed to provide, and did provide, the following administrative services for the benefit of Settlement Class Members, as they are defined in the Agreement:

- Cause online banner advertisements to appear on websites including Coindesk, Facebook, Instagram, Reddit, and the Google Display Network;
- Purchase sponsored search ads on search engines including Google, Bing, and Yahoo!;
- Cause a press release to be distributed over *PR Newswire*;
- Email a Class Notice to potential Settlement Class Members;
- Establish and maintain an official Settlement Website containing information about the proposed Settlement;
- Establish and maintain an official toll-free number that Settlement Class Members may contact for additional information about the proposed Settlement; and,
- Receive, process, track, and report on Proof of Claim Forms sent to or received by Epiq.

BANNER ADVERTISEMENTS AND SPONSORED SEARCH ADS

5. Pursuant to Section 6(c) of the Order, Epiq ran online banner advertisements (“Banner Notice”) on websites including Coindesk, Facebook, Instagram, Reddit, and the Google Display Network, as well as sponsored search ads on search engines including Google, Bing, and Yahoo!, beginning on March 16, 2023. The Banner Notice allowed visitors of the websites to click on a link taking them to the Settlement Website. An “impression” is an instance in which a Banner Notice is visible to someone using a web browser. In total, 27,806,675 Banner Notice impressions were presented. Sample copies of the Banner Notices are attached hereto as **Exhibit A**.

PRESS RELEASE

6. Pursuant to Section 6(d) of the Order, on March 16, 2023, Epiq distributed a press release to *PR Newswire*'s U.S. Newswire announcing the proposed Settlement to media outlets across the country. A copy of the press release that was distributed by *PR Newswire* is attached hereto as **Exhibit B**.

INDIVIDUAL CLASS NOTICE VIA EMAIL

7. Pursuant to Section 6(b) of the Order, Epiq was directed to cause the Court-approved Class Notice to be formatted for electronic distribution by email, and sent by email, to potential Settlement Class Members for whom an email address was included in the records originally provided by Plaintiffs in connection with the Class Certification Notice distributed by Epiq on September 13, 2019. Attached hereto as **Exhibit C** is a copy of the Class Notice that Epiq electronically disseminated notifying potential Settlement Class Members about the Settlement. The Class Notice contained substantial, albeit easy to read, information that made potential Settlement Class Members aware of their rights under the proposed Settlement and provided instructions on how to obtain more information by visiting the Settlement Website or calling toll-free number.

8. The Class Notice, which was formatted for distribution using embedded html text, provided potential Settlement Class Members with a link to the Settlement Website. The Class Notice was formatted with easy-to-read text without graphics, images, or other elements that would increase the likelihood that the message could be blocked by Internet Service Providers and/or spam filters. Epiq also followed standard email protocols, including utilizing "unsubscribe" links and including Epiq's contact information in the Class Notice.

9. On March 16, 2023, Epiq sent the Class Notice to the 304,804 potentially valid email addresses provided by Class Counsel and used by Epiq in connection with the Class Certification Notice distributed to the Class on September 13, 2019. Each Class Notice was transmitted with a unique message identifier. If the receiving email server could not deliver the message, a “bounce code” was returned along with the unique message identifier. Epiq closely monitored all deliverability attempts of the Class Notice. Of the 304,804 Class Notices that were sent, 118,411 Class Notices were delivered.

10. Of the 186,393 Class Notices that could not be delivered, they were undeliverable potentially because the email address no longer existed, the email address had a bad domain name or address error, the recipient’s mailbox was full, or the recipient’s server was unable to deliver. Epiq made three attempts to deliver the Email Notices that bounced back before determining the Email Notice attempt was undeliverable and ceasing efforts to deliver the Email Notice.

SETTLEMENT WEBSITE

11. Pursuant to Section 6(e) of the Order, on March 15, 2023, Epiq launched a website, www.GAWMinersClassAction.com, that potential Settlement Class Members can visit to obtain additional information about the proposed Settlement, as well as important documents, including the Long Form Notice, Summary Notice, Proof of Claim Form, Settlement Agreement, Plan of Distribution, Amended Preliminary Approval Order, and Class Counsel’s Motion For Fees, Reimbursement of Expenses, and Incentive Awards for the Named Plaintiffs. The Settlement Website contains a summary of options available to potential Settlement Class Members, deadlines to act, and answers to frequently asked questions. Settlement Class Members are also able to file a Proof of Claim Form via the website, or download a paper Proof of Claim Form, which they may

then file by mail or email. References to the Settlement Website were prominently displayed in the Class Notice.

12. As of the date of this Declaration, the Settlement Website has been visited by 24,608 unique visitors and 41,721 website pages have been viewed.² Epiq has maintained and will continue to maintain and update the Website throughout the administration of the proposed Settlement.

TOLL-FREE INFORMATION LINE

13. Pursuant to Section 6(e) of the Order, on March 15, 2023, Epiq established and is maintaining a toll-free interactive Voice Response Unit (“VRU”), telephone number, to provide information and accommodate inquiries from Settlement Class Members. Callers hear an introductory message and then are provided with scripted information about the proposed Settlement in the form of recorded answers to frequently asked questions. Callers also have the options of requesting a Long Form Notice and Proof of Claim Form (“Notice Packet”) by mail, or speaking to a live operator during normal business hours. A copy of the Notice Packet is attached hereto as **Exhibit D**. The toll-free number was included in the Class Notice sent to Settlement Class Members, and the automated telephone system is available 24 hours per day, 7 days per week.

14. As of the date of this Declaration, the toll-free number has received 4 calls representing 53 total minutes, and call center representatives have handled 9 inbound calls representing 105 minutes of use and no outbound calls. Epiq has and will continue to maintain and update the VRU throughout the settlement administration process.

15. Epiq has promptly responded to all questions and inquiries from potential Settlement Class Members (whether received via mail, telephone, or otherwise).

² A “session” refers to a user’s visit to the website and associated activity during a single period of time, as opposed to a “page view,” which also counts visits to links or sites within a website and any time the site re-loads.

EMAIL INBOX

16. Epiq established and maintains an email inbox, info@GAWMinersClassAction.com, for Settlement Class Members to submit requests for Notice Packets, submit Proof of Claim Forms, and ask questions regarding the proposed Settlement. As of the date of this Declaration, Epiq has received and responded to a total of 90 incoming emails. Epiq will continue to maintain this inbox throughout the settlement administration.

SETTLEMENT ADMINISTRATION EXPENSES

17. Epiq incurred \$65,400.34 in Settlement Administration Expenses through April 30, 2023. Epiq also has incurred \$57,153.17 in class notice expenses that have not been reimbursed. I understand that Class Counsel requested reimbursement of these expenses in their Motion for Fees, Reimbursement of Expenses, and Incentive Awards for the Named Plaintiffs.

18. Epiq has incurred \$3,684.19 in additional Settlement Administration Expenses through May 31, 2023.

19. Epiq estimates that its remaining Settlement Administration Expenses are expected to be approximately \$93,821.02, including work in connection with benefit distribution and administration completion.

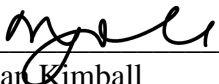
OBJECTIONS RECIEVED

20. Pursuant to Section 8 of the Order, Settlement Class Members who wished to object to the proposed Settlement were required to submit written objections to the Clerk of the Court, Counsel for Defendant, and Class Counsel, such that they were filed and served by the objection deadline of May 25, 2023. As of the date of this Declaration, Epiq has not received and is not aware of any written objections to the proposed Settlement.

PROOF OF CLAIM FORMS RECEIVED

21. Pursuant to Section 6(b) of the Order, Settlement Class Members who wished to be eligible to receive a distribution from the Net Settlement Fund were required to submit a completed Proof of Claim Form to the Settlement Administrator online or via email or via U.S. Mail, so that it is submitted online or postmarked no later than July 14, 2023. As of the date of this Declaration, Epiq has received a total of 1,036 Proof of Claim Forms.³

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on June 9, 2023 in Sacramento, California.



Morgan Kimball
Project Manager, Epiq

³ As the Claims Deadline has not yet passed, Epiq is still receiving, reviewing, and processing claims. The claims information provided herein is subject to further analysis for eligibility and quality control, and is, therefore, preliminary at this time.

EXHIBIT A



- Friends
- Most Recent
- Groups
- Marketplace
- Watch
- See more

Legal Notice
Sponsored ·

GAW Miners or ZenMiner virtual currency product purchasers may be included in a class action settlement.



GAWMINERSCLASSACTION.COM
Class Action Settlement

[Learn more](#)

- Like
- Comment
- Share
-

Sponsored



The latest innovations from MOEN
homedepot.com



Search Facebook



- Friends
- Most Recent
- Groups
- Marketplace
- Watch
- See more

meatyourwild with **Otto Wilde Grillers USA.** Sponsored ·

The Otto Grill



Sponsored



GAW Miners and ZenMiner Settlement
gawminersclassaction.com



Bitcoin ▼ \$24,763.80 -1.11%

Ethereum ▼ \$1,650.60 -2.15%

Binance Coin ▼ \$311.01 -0.12%

XRP ▼ \$0.36152402 -2.14%

Aptos ▼ \$12.13 -10.89%

Cardano ▼ \$0.323136

▶ Crypto Prices →

CoinDesk Market Index →

CoinDesk Indices

About Us
News

Indices
Contact Us

Research

Announcements

Governance

Digital Asset Classification Standard (DACS): A Reliable and Transparent Taxonomy

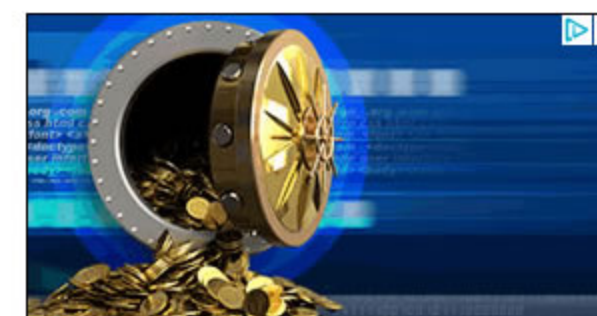
The Digital Asset Classification Standard (DACS), created by CoinDesk Indices, provides taxonomy with reliable, comprehensive and standardized industry definitions. DACS includes the top 500 digital assets by market capitalization and offers 3 levels of granularity across 7 Sectors, 26 Industry Groups and 40 Industries.

For more information please visit →



About CoinDesk Indices

CoinDesk Indices (CDI), a subsidiary of CoinDesk, has been the leading provider of digital asset indices by AUM since 2014. We are driven by precision, rigor, research and a desire to educate the marketplace and empower investors. CoinDesk, a media, events, data, and indices company, is the most influential and trusted platform for the global crypto ecosystem. CDI has three distinct product lines: single-asset reference indices, broad market and sector indices, and systematic strategy indices. The CoinDesk Bitcoin Price Index (XBIX) has the longest index track record and underlies the world's largest digital asset products. Our broad market and sector indices offer the most comprehensive broad market benchmarks, and our investible sectors are constructed using CDI's industry-adopted taxonomy. Our systematic strategy indices help investors target specific outcomes.



Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

CoinDesk Indices

- About Us
- Indices
- Research
- Announcements
- Governance
- News
- Contact Us

Digital Asset Classification Standard (DACs): A Reliable and Transparent Taxonomy

The Digital Asset Classification Standard (DACs), created by CoinDesk Indices, provides taxonomy with reliable, comprehensive and standardized industry definitions. DACs includes the top 500 digital assets by market capitalization and offers 3 levels of granularity across 7 Sectors, 26 Industry Groups and 40 Industries.

For more information please visit →

About CoinDesk Indices

CoinDesk Indices (CDI), a subsidiary of CoinDesk, has been the leading provider of digital asset indices by AUM since 2014. We are driven by precision, rigor, research and a desire to educate the marketplace and empower investors. CoinDesk, a media, events, data, and indices company, is the most influential and trusted platform for the global crypto ecosystem. CDI has three distinct product lines: single-asset reference indices, broad market and sector indices, and systematic strategy indices. The CoinDesk Bitcoin Price Index (XBX) has the longest index track record and underlies the world's largest digital asset products. Our broad market and sector indices offer the most comprehensive broad market benchmarks, and our investible sectors are constructed using CDI's industry-adopted taxonomy. Our systematic strategy indices help investors target specific outcomes.



Click here for more information.
www.GAWMinersClassAction.com

Markets

Crypto Observers Believe U.S. Banking Crisis Could Strengthen Crypto Ecosystem in the Long Term

Robust banking solutions for crypto companies and investor interest in the resilience of the ecosystem could serve as key features in the coming months, one developer opined.

By Shaurya Malwa ⌚ Mar 16, 2023 at 7:30 a.m. EDT



Silicon Valley Bank Sign (Provided)



Jenny Johnson

President and CEO
Franklin Templeton

Jenny will discuss developing crypto-linked investment products in a bear market, the mood among her clients and her lon...

[Secure Your Seat](#)

Market observers say the ongoing breakdown of crypto-focused banks can have benefits for the crypto ecosystem in the long term, brushing off bearish sentiment that has emerged in crypto circles over the past few days.

ADVERTISEMENT



Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Click here for more information.

www.GAWMinersClassAction.com

| | | | | |
|--|-----|--------------|---------|---|
| | BTC | \$24,835.19 | ▼ 0.70% | → |
| | ETH | \$1,655.55 | ▼ 1.63% | → |
| | BNB | \$311.12 | ▲ 0.34% | → |
| | XRP | \$0.36207378 | ▼ 1.56% | → |
| | APT | \$12.21 | ▼ 9.91% | → |

[View All Prices](#)



Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Technology



Arbitrum to Airdrop New Token and Transition to DAO

The long-awaited ARB token will grant holders the ability to vote on changes to the leading Ethereum Layer 2 network.

By Sam Kessler Mar 16, 2023

Plagiarism, Fork, or Simple Mistake? Shiba Inu Community Debates the Origin Story of Shibarium

SHIB is down 8% and millions have been unstaked over allegations that the Shibarium code was stolen.

By Sam Reynolds Mar 16, 2023



Uniswap Version 3 Goes Live on BNB Chain

Over 66% of voters supported the deployment in a governance vote held in February.

By Shaurya Malwa Mar 15, 2023



MEV Rewards on Ethereum Reach All-Time High During SVB Bank Run and USDC Depeg

Profits made from MEV were more than twice as high as the last peak during the FTX implosion.

By Margaux Nijkerk Mar 15, 2023



Trending in Technology

1 USDC Stablecoin Depegs, Crypto Market Goes Haywire After Silicon Valley Bank Collapses

Mar 11, 2023



2 How Silvergate's Crypto Collapse Differed From Silicon Valley Bank's: No Bailout

Mar 10, 2023



3 Reviewing Code Is Mind-Numbing: Q&A With Bitcoin Maintainer Andrew Chow



4 DeFi Protocol Tender.fi Hacker Returns \$1.6M Following Pricing Oracle Glitch



Click here for more information. www.GAWMinersClassAction.com

Technology



Arbitrum to Airdrop New Token and Transition to DAO

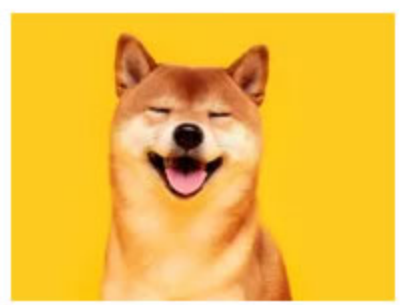
The long-awaited ARB token will grant holders the ability to vote on changes to the leading Ethereum Layer 2 network.

By Sam Kessler Mar 16, 2023

Plagiarism, Fork, or Simple Mistake? Shiba Inu Community Debates the Origin Story of Shibarium

SHIB is down 8% and millions have been unstaked over allegations that the Shibarium code was stolen.

By Sam Reynolds Mar 16, 2023



Uniswap Version 3 Goes Live on BNB Chain

Over 66% of voters supported the deployment in a governance vote held in February.

By Shaurya Malwa Mar 15, 2023



MEV Rewards on Ethereum Reach All-Time High During SVB Bank Run and USDC Depeg

Profits made from MEV were more than twice as high as the last peak during the FTX implosion.

By Margaux Nijkerk Mar 15, 2023



Trending in Technology

1 USDC Stablecoin Depegs, Crypto Market Goes Haywire After Silicon Valley Bank Collapses

Mar 11, 2023



2 How Silvergate's Crypto Collapse Differed From Silicon Valley Bank's: No Bailout

Mar 10, 2023



3 Reviewing Code Is Mind-Numbing: Q&A With Bitcoin Maintainer



4 DeFi Protocol Tender.fi Hacker Returns \$1.6M Following Draining





Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Click here for more information.

www.GAWMinersClassAction.com

☰
TV & Videos
Newsletters
Podcasts
 CoinDesk
Indices
Consensus
Log In / Create Account
🔍

Markets
Finance
Policy
Technology
Web3
Learn
Consensus Magazine
Sponsored Content

Bitcoin ▼ \$24,752.00 -1.30%
Ethereum ▼ \$1,648.87 -2.45%
Binance Coin ▼ \$310.19 -0.14%
XRP ▼ \$0.36102063 -2.25%
Aptos ▼ \$12.10 -11.15%
Cardano ▼ \$0.32292
▶ [Crypto Prices](#) →
[CoinDesk Market Index](#) →

Markets

Crypto Observers Believe U.S. Banking Crisis Could Strengthen Crypto Ecosystem in the Long Term

Robust banking solutions for crypto companies and investor interest in the resilience of the ecosystem could serve as key features in the coming months, one developer opined.

By Shaurya Malwa ⌚ Mar 16, 2023 at 7:30 a.m. EDT



Silicon Valley Bank Sign (Provided)

ADVERTISEMENT



Order Delivery

Jersey Mike's Subs
Hauppauge 10AM-9PM

| | | | | |
|--|------------|--------------|----------------|---|
| | BTC | \$24,752.00 | ▼ 1.30% | → |
| | ETH | \$1,648.87 | ▼ 2.45% | → |
| | BNB | \$310.19 | ▼ 0.14% | → |
| | XRP | \$0.36102063 | ▼ 2.25% | → |

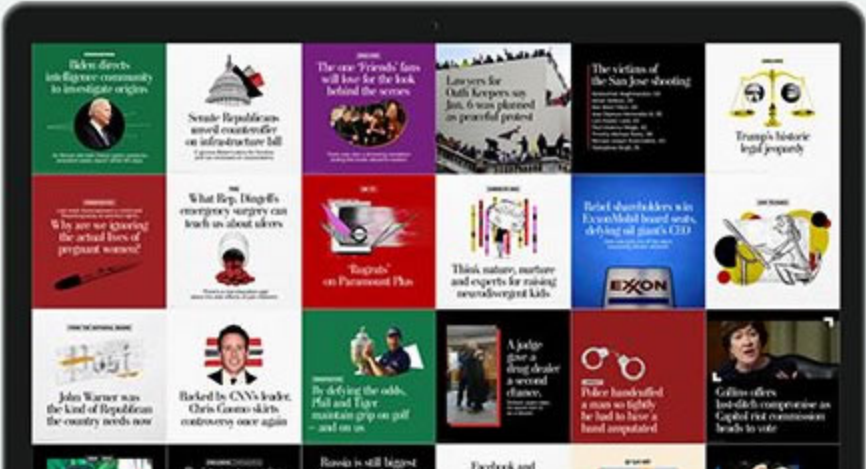
f
in
🐦
✉

The Washington Post

See top stories each time you open a new tab.

Download our **Chrome extension**.

Add to Chrome



TECHNOLOGY

Help Desk Future of Transportation Innovations Internet Culture Space Tech Policy Video Gaming

YOUR DATA AND PRIVACY

Don't get hacked on Facebook. Do these 6 things now.

If you think you're safe from hackers and scammers on Facebook, you're wrong. Here's how to protect yourself.

By Heather Kelly • March 16, 2023



TECH POLICY

Biden administration wants TikTok's Chinese owners to divest

The Biden administration has told TikTok that its Chinese owners must sell their stakes for the app to avoid a U.S. ban.

By Jeff Stein, Cat Zakrzewski, Drew Harwell and Ellen Nakashima • March 15, 2023



TECH

Meta starts cutting 10,000 workers in second round of layoffs

Facebook parent company Meta is slashing its workforce, part of a wave of layoffs roiling Silicon Valley during an uncertain economic climate.

By Naomi Nix • March 15, 2023



SPACE

NASA unveils a new spacesuit astronauts will wear on the moon

The new suits will cater to a wider range of body types and allow



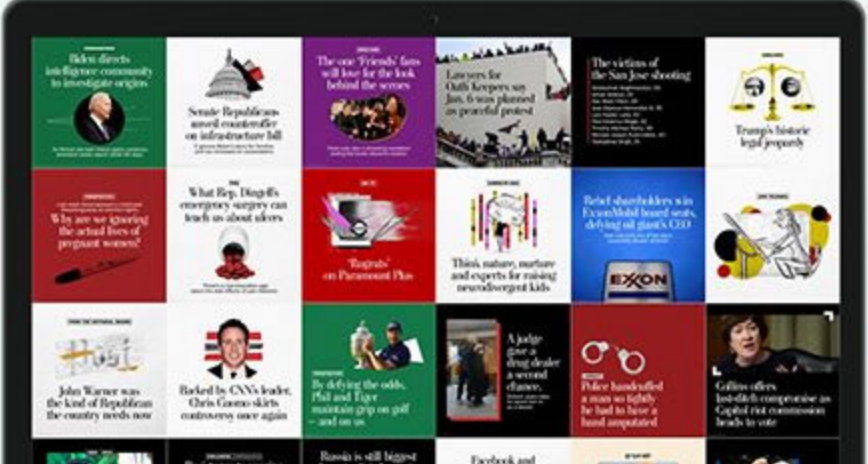
Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

The Washington Post

See top stories each time you open a new tab.

Download our **Chrome extension**.

Add to Chrome



TECHNOLOGY

Help Desk Future of Transportation Innovations Internet Culture Space Tech Policy Video Gaming

YOUR DATA AND PRIVACY

Don't get hacked on Facebook. Do these 6 things now.

If you think you're safe from hackers and scammers on Facebook, you're wrong. Here's how to protect yourself.

By Heather Kelly • March 16, 2023



TECH POLICY

Biden administration wants TikTok's Chinese owners to divest

The Biden administration has told TikTok that its Chinese owners must sell their stakes for the app to avoid a U.S. ban.

By Jeff Stein, Cat Zakrzewski, Drew Harwell and Ellen Nakashima • March 15, 2023



TECH

Meta starts cutting 10,000 workers in second round of layoffs

Facebook parent company Meta is slashing its workforce, part of a wave of layoffs roiling Silicon Valley during an uncertain economic climate.

By Naomi Nix • March 15, 2023



SPACE



Click here for more information.
www.GAWMinersClassAction.com

MARKETS CRYPTOCURRENCY

FX | AMERICAS FX | ASIA FX | EUR FX | CRYPTOCURRENCY

Cryptocurrency Pairs

| SYMBOL | NAME | PRICE | CHANGE | %CHANGE | PREVIOUS CLOSE |
|-------------------|-----------------------------------|-----------|---------|---------|----------------|
| BITCOIN | Bitcoin/USD Coin Metrics | 24,754.7 | +381 | +1.56 ▲ | 24,373.7 |
| BTC-BITSTAMP | Bitcoin/USD Bitstamp | 24,759 | +391 | +1.6 ▲ | 24,368 |
| BITCOIN | Bitcoin/USD Coinbase | 24,772.35 | +353.48 | +1.45 ▲ | 24,418.87 |
| BTC-GEMINI | Bitcoin/USD Gemini | 24,754 | +364.75 | +1.5 ▲ | 24,389.25 |
| BTC-BITFINEX | Bitcoin/USD Bitfinex | 24,756 | +408 | +1.68 ▲ | 24,348 |
| BITCOIN CASH | Bitcoin Cash/USD Coin Metrics | 124.38 | +0.26 | +0.21 ▲ | 124.12 |
| BCH-BITSTAMP | Bitcoin Cash/USD Bitstamp | 123.9 | +0.31 | +0.25 ▲ | 123.59 |
| BITCOIN CASH | Bitcoin Cash/USD Coinbase | 124.38 | +0.2 | +0.16 ▲ | 124.18 |
| BAT-COINMETRICS | BAT/USD Coin Metrics | 0.23 | UNCH | UNCH | 0.23 |
| BNB-COINMETRICS | Binance/USD Coin Metrics | 310.48 | +4.47 | +1.46 ▲ | 306.01 |
| EOS-COINMETRICS | EOS/USD Coin Metrics | 1.05 | +0.02 | +1.65 ▲ | 1.04 |
| ETHEREUM | Ethereum/USD Coin Metrics | 1,649.44 | +1.15 | +0.07 ▲ | 1,648.29 |
| ETC-COINMETRICS | Ethereum Classic/USD Coin Metrics | 18.43 | +0.06 | +0.34 ▲ | 18.36 |
| ETH-COINBASE | Ether/USD Coinbase | 1,649.95 | -1.85 | -0.11 ▼ | 1,651.8 |
| ETH-GEMINI | Ether/USD Gemini | 1,648.97 | +0.17 | +0.01 ▲ | 1,648.8 |
| ETH-BITFINEX | Ether/USD Bitfinex | 1,648.7 | +1.9 | +0.12 ▲ | 1,646.8 |
| LITECOIN | Litecoin/USD Coin Metrics | 78.3 | +1.87 | +2.45 ▲ | 76.43 |
| LTC-BITFINEX | Litecoin/USD Bitfinex | 78.35 | +2.2 | +2.89 ▲ | 76.15 |
| LITECOIN | Litecoin/USD Coinbase | 78.3 | +1.94 | +2.54 ▲ | 76.36 |
| LUNA-COINMETRICS | Terra/USD Coin Metrics | 0 | +0 | +0.39 ▲ | 0 |
| XRP | XRP/USD Coin Metrics | 0.36 | UNCH | UNCH | 0.36 |
| XRP | XRP/USD Bitstamp | 0.36 | UNCH | UNCH | 0.36 |
| XTZ-COINMETRICS | Tezos/USD Coin Metrics | 1.19 | +0.04 | +3.71 ▲ | 1.15 |
| XLM-COINMETRICS | Stellar Lumens/USD Coin Metrics | 0.08 | UNCH | UNCH | 0.08 |
| XLM-BITFINEX | Stellar Lumens/USD Bitfinex | 0.08 | UNCH | UNCH | 0.08 |
| ZRX-COINMETRICS | Ox/USD Coin Metrics | 0.22 | UNCH | UNCH | 0.22 |
| ZRX-BITFINEX | Ox/USD Bitfinex | 0.22 | UNCH | UNCH | 0.22 |
| ZEC-COINMETRICS | Zcash/USD Coin Metrics | 33.28 | +0.07 | +0.2 ▲ | 33.22 |
| DOGE-COINMETRICS | Dogecoin/USD Coin Metrics | 0.07 | UNCH | UNCH | 0.07 |
| NEXO-COINMETRICS | Nexo/USD Coin Metrics | 0.62 | UNCH | UNCH | 0.62 |
| ADA-COINMETRICS | Cardano/USD Coin Metrics | 0.32 | UNCH | UNCH | 0.33 |
| LINK-COINMETRICS | Chainlink/USD Coin Metrics | 6.55 | UNCH | UNCH | 6.55 |
| MATIC-COINMETRICS | Polygon/USD Coin Metrics | 1.12 | +0.01 | +0.7 ▲ | 1.11 |
| ALGO-COINMETRICS | Algorand/USD Coin Metrics | 0.21 | UNCH | UNCH | 0.2 |

S&P GAINERS LIVE 09:42

| | | |
|--------------------|--------|--------|
| ADOBE INC. | 348.43 | +4.96% |
| PROGRESSIVE CORP. | 137.73 | +1.98% |
| INTEL | 28.87 | +1.62% |
| MOTOROLA SOLUTIONS | 262.43 | +1.43% |
| LENNAR | 101.13 | +0.94% |

BREAKING NEWS ECB DROPS GUIDANCE ON FUTURE RATE MOVES

S&P 500: 3,471.28 (+0.48%)
 DOW: 31,995.02 (+0.56%)
 NASDAQ: 10,100.00 (+0.55%)



Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Click here for more information.

www.GAWMinersClassAction.com

TRENDING NOW

1 European Central Bank hikes rates despite market mayhem, pledges support if needed

2 First Republic falls 30% as regional bank stocks continue to sink

Watch the moment Russian jets intercept



Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Exclusive news, data and analytics for financial market professionals

REFINITIV



World Business Legal Markets More

My View



Sign In

Register

SPX 3,891.93 IXIC 11,434.05 DJI 31,874.57 ▼ STOXX 435.51 -0.22% ▲ FTSE 7,346.62 +0.03%

Get real-time market data on Refinitiv

Markets

Asian Markets

Carbon Markets

Commodities

Currencies

Deals

Emerging Markets

European Markets

Funds

Global Market Data

Rates & Bonds

Stocks

U.S. Markets

Wealth

Macro Matters

Latest Markets News

On the precipice: How Credit Suisse's day of drama unfolded

FOCUS - 7:01 AM EDT

Sign up now
EXTRADE
from Morgan Stanley

Open an account
EXTRADE
from Morgan Stanley

Sponsored by **SELECT SECTOR SPDRs**
Exchange Traded Funds (ETFs)

AD

KEEPING GOOD COMPANY

READ THE PROSPECTUS CAREFULLY BEFORE INVESTING

SECTORS UPCLOSE

SVB contagion 'gaining momentum' in European banks

Should Chinese stocks traded in U.S. dollars be avoided?

Feedback

On March 16, 2008, Bear Stearns was forced into the arms of JPMorgan Chase & Co in a dramatic



Click here for more information.
www.GAWMinersClassAction.com

Exclusive news, data and analytics for financial market professionals **REFINITIV**



World ▾ Business ▾ Legal ▾ Markets ▾ More ▾

My View ▾



Sign In

Register

SPX 3,891.93 IXIC 11,434.05 DJI 31,874.57 ▼ STOXX 435.51 -0.22% ▲ FTSE 7,346.62 +0.03%

▶ Get real-time market data on Refinitiv

Markets

Asian Markets

Carbon Markets

Commodities

Currencies

Deals

Emerging Markets

European Markets

Funds

Global Market Data

Rates & Bonds

Stocks

U.S. Markets

Wealth

Macro Matters

Latest Markets News

On the precipice: How Credit Suisse's day of drama unfolded

FOCUS - 7:01 AM EDT

Sign up now
E*TRADE
from Morgan Stanley

Open an account
E*TRADE
from Morgan Stanley



Sponsored by **SELECT SECTOR SPDRs**
Exchange Traded Funds (ETFs)

Sectors UpClose

SECTORS UPCLOSE

SVB contagion 'gaining momentum' in European banks

Should Chinese stocks traded in U.S. dollars be avoided?

On March 16, 2008, Bear Stearns was forced into the arms of JPMorgan Chase & Co in a dramatic weekend rescue after Wall Street turned on the investment bank, fearing it would collapse.

Future of Money
FTX transferred \$2.2 bln



Technology
China's answer to





Purchasers of virtual currency products from GAW Miners or ZenMiner may be included in a class action settlement.

Click here for more information.

www.GAWMinersClassAction.com

JOEL KHALILI

BUSINESS MAR 16, 2023 7:00 AM

Crypto Faces a Banking Crisis. For Some, It's a Conspiracy

The collapse of crypto-friendly Silvergate and Signature Bank has left the industry scrambling to find anyone willing to work with them.



ILLUSTRATION: JAMES MARSHALL; GETTY IMAGES

WHEN CITIBANK LOCKED trading platform Swan Bitcoin out of its corporate bank account in October, it did so without warning or explanation. The only confirmation of what had happened came in the form of a paper check for the account balance, delivered to an old home address of Cory Klippsten, Swan's CEO.

FEATURED VIDEO



About 564,000 results Any time

Legal Notice | Class Action Settlement

<https://www.gawminersclassaction.com>

Ad Purchasers of virtual currency from **GAW Miners** or ZenMiner may be eligible for benefits.

A judge has certified a class-action suit in federal court in Connecticut, in a case alleging **securities fraud** by GAW Miners and other defendants. This may be the first class certification in a case involving cryptocurrency. This follows an earlier SEC enforcement action and wire fraud plea by Garza in 2017.

GAW Miners crypto class-action certified 3 years after filing suit
[www.theblock.co/post/29333/gaw-miners-crypto-class-action-certified-3-years-after ...](http://www.theblock.co/post/29333/gaw-miners-crypto-class-action-certified-3-years-after-...)

Was this helpful?

If you purchased certain products from GAW Miners or ...

<https://www.prnewswire.com/news-releases/if-you-...>

Web 1 hour ago · More details are available at www.gawminersclassaction.com. What is this about? The lawsuit alleges that **GAW Miners** and ZenMiner made false and misleading ...

Announcing a Class Action Lawsuit Involving Individuals ...

<https://www.prnewswire.com/news-releases/...>

Web Sep 13, 2019 · **Class** Members who request exclusion cannot get any money or benefits from this lawsuit, but will also not be bound by any orders or judgments in this case that ...

Estimated Reading Time: 3 mins

Videos of GAW miners Class action

bing.com/videos



Former miners from Lusikisiki yet to see a cent of Silicosis C...

738 views · Oct 19, 2021
 YouTube > SABC News



Australian teens launch class action against mining

Mar 1, 2021
 REUTERS > Reuters Staff



Ex-miners asked compensation, cl

173 views · 2 mon
 YouTube > Newzro

See more videos of GAW miners Class action

GAW Miners Class Action - Frequently Asked Questions

<https://www.gawminersclassaction.com/Home/Faq>

Web The **lawsuit** is a **class action lawsuit** pending in the United States District Court for the District of Connecticut alleging that **GAW Miners**, LLC and ZenMiner, LLC committed ...

GAW Miners Class Action - Documents

<https://www.gawminersclassaction.com/Home/Documents>

Web Jul 16, 2021 · **GAW Miners Class Action** - Documents **GAW Miners Class Action** Audet, et

Virtual Currency Litigation

ALL CHAT IMAGES VIDEOS MAPS NEWS MORE

About 220,000 results Any time

Virtual Currency | Class Action Settlement

<https://www.gawminersclassaction.com>

Ad Purchasers of **virtual currency** from GAW Miners or ZenMiner may be eligible for benefits.

People also ask

Did the defendants knowingly operate the virtual currency exchange business?

They operated their virtual currency exchange business using websites, as well as operating virtual currency ATM machines in New Hampshire...

[Six Charged with Crimes Related t...
www.justice.gov/usao-nh/pr/six-charge...](http://www.justice.gov/usao-nh/pr/six-charge...)

What does the OCC's letter say about cryptocurrency custody services?

The OCC's letter concludes, that "cryptocurrency custody services, including holding unique cryptographic keys associated with...

[Five Ways for Compliance to Mitiga...
www.k2integrity.com/en/knowledge/e...](http://www.k2integrity.com/en/knowledge/e...)

H
e
c
S
e
c
d
F
w

Feedback

orrick.com

Blockchain and Virtual Currency - Orrick, Herrington

<https://www.orrick.com/en/Practices/Blockchain-and-Cryptocurrency>

Orrick's Blockchain and **Virtual Currency** group delivers thoughtful and cutting-edge advice that helps propel the industry forward while providing the legal framework to withstand regulatory scrutiny. In a fast-paced and unprecedented market, companies need a global and agile legal team.

Feedback

Five Ways for Compliance to Mitigate Cryptocurrency Risks

<https://www.k2integrity.com/en/knowledge/expert...>

1. Review best practices for banking money service businesses (MSBs). The Financial Crimes ...
2. Identify other types of high-risk digital currency customers. Much like when offering ...
3. Understand the needs and challenges of building new books of business. Financial services ...
4. Mitigate money-laundering risks. Institutions today combat money-laundering risks through ...



Cryptocurrency Class Action



News

Images

Videos

Shopping

More

Tools

About 21,600,000 results (0.42 seconds)

Sponsored

www.gawminersclassaction.com/

**Legal Notice - Class Action Settlement**

Purchasers of virtual currency from GAW Miners or ZenMiner may be eligible for benefits.



Fox Business

https://www.foxbusiness.com › markets › crypto-exchan...

U.S. crypto exchanges could face possible class-action lawsuit7 days ago — **Crypto's** latest headache could be a big **class action lawsuit** filed on behalf of retail investors against top U.S. **crypto** exchanges.

Davis Wright Tremaine

https://www.dwt.com › insights › 2021/05 › crypto-in...

"Crypto Investors Withdraw Class Action Suits Against ...Recently, **cryptocurrency** buyers withdrew five separate proposed **class actions** against various **cryptocurrency** companies. The cases, which were filed against ...

Reuters

https://www.reuters.com › legal › transactional › blockon...

Block.one's revived \$22 mln settlement could be template for ...Jan 30, 2023 — (Reuters) - After the rejection last summer of a proposed \$27.5 million **settlement** of tokenholders' **class action** securities fraud claims and ...

Bloomberg Law

https://news.bloomberglaw.com › business-and-practice

Crypto Lawyers Bet Big on Class Action Lawsuits as Market



Virtual Currency Litigation



News

Images

Shopping

Videos

More

Tools

About 3,280,000 results (0.39 seconds)

Sponsored

www.gawminersclassaction.com/

**Virtual Currency - Class Action Settlement**

Purchasers of virtual currency from GAW Miners or ZenMiner may be eligible for benefits.



Yale Journal on Regulation

<https://www.yalejreg.com> › Bulletin**Crypto Litigation: An Empirical View**Nov 28, 2022 – In the early part of 2022, as cryptocurrencies crashed in value, lawsuits related to **crypto** assets soared. It is estimated that as of May 2022, ...

Bloomberg Law

<https://news.bloomberglaw.com> › business-and-practice**Crypto Lawsuit Deluge Has Big Firms Scrambling to Keep Up**May 17, 2022 – **Crypto** has generated more than 200 class action lawsuits and other private **litigation** as of this month, up more than 50% since the start of 2020 ...

K&L Gates

<https://www.klgates.com> › Litigation-Minute-Current-I...**Current Issues in Cryptocurrency-Related Litigation - K&L Gates**Nov 22, 2022 – Litigators should be mindful of recurring malfeasance and resulting **legal** claims concerning **cryptocurrency** and other digital assets.

Arnold & Porter

<https://www.arnoldporter.com> › advisories › 2023/01**2022 in Review: Crypto Litigation, Compliance, Cybersecurity ...**Jan 10, 2023 – **Litigation** over the ownership of deposited **cryptocurrency** assets and other novel issues arising in crypto bankruptcies will likely take years— ...

About 220,000 search results

Ad related to: Virtual Currency Litigation

www.gawminersclassaction.com

Legal Notice - Class Action Settlement

Purchasers of **virtual currency** from GAW Miners or ZenMiner may be eligible for benefits.

pro.bloomberglaw.com > [brief](#) > [cryptocurrency-laws](#) 

Cryptocurrency Laws and Regulations by State - Bloomberg Law

May 26, 2022 · A business that solely deals in “convertible virtual currency” as defined by RSA § 399-G:1 (VII) is **exempt from money transmitter licensing**, although still **bound New Hampshire's...**

Videos



msn.com
Bitcoin hovers near \$24,000, and judge dismisses lawsuit against Coinbase: CNBC Crypto...
Feb 2, 2023



youtube.com
Digital Assets: Virtual Currencies, Security, and U.S. Foreign Policy
May 9, 2022 · 2.6K Views



msn.com
Use of Cryptocurrency, Virtual Assets New Ways To Radicalize Youth: Amit Shah
Nov 17, 2022

 [View all](#)

www.orrick.com > [Blockchain-and-Cryptocurrency](#) 


Blockchain and Virtual Currency - Orrick, Herrington & Sutcliffe

Orrick's Blockchain and **Virtual Currency** group delivers thoughtful and cutting-edge advice that helps propel the industry forward while providing the legal framework to withstand regulatory...

www.romanolaw.com > [2021/06/12](#) > [investors-beware](#) 

Investors Beware: Cryptocurrency Litigation is on the Rise

Jun 12, 2021 · A cryptocurrency is a **digital or virtual currency that is secured by cryptography, unique digital signatures and complex mathematical algorithms which protect the currency from...**

www.romanolaw.com > [cryptocurrency-litigation](#) 

Cryptocurrency Litigation Attorneys - Romano Law

About 564,000 search results

Ad related to: GAW Miners Class Action

www.gawminersclassaction.com


Virtual Currency - Class Action Settlement

Purchasers of virtual currency from **GAW Miners** or ZenMiner may be eligible for benefits.

The lawsuit is a class action lawsuit pending in the United States District Court for the District of Connecticut alleging that GAW Miners, LLC and ZenMiner, LLC committed violations of Section 10 (b) of the Securities Exchange Act of 1934 and Securities and Exchange Commission Rule 10b-5 promulgated thereunder; violations of Sections 36b-29 (a) (1) and (2) of the Connecticut Uniform Securities Act; and common law fraud.

www.gawminersclassaction.com/Home/Faq

GAW Miners Class Action - Frequently Asked Questions

www.prnewswire.com > news-releases > if-you 

If you purchased certain products from GAW Miners or ZenMiner ...

1 hour ago · More details are available at www.gawminersclassaction.com. What is this about? The lawsuit alleges that **GAW Miners** and ZenMiner made false and misleading statements to potentia...

Top Stories

If you purchased certain products from GAW Miners or ZenMiner between August 1, 2014 and January 19, 2015, your rights may be affected by a class action...

A proposed settlement has been reached in a class action lawsuit called Denis Marc Audet et al. v. Stuart Fraser et al., Case ...

1011 News

1 hour ago



[View all](#)

securities.stanford.edu > filings-case 

Securities Class Action Clearinghouse: Case Page

Jun 15, 2016 · Securities **Class Action** Clearinghouse: Case Page Case Summary **GAW Miners, LLC** : Cryptocurrency Securities Litigation Case Status: ONGOING On or around 11/30/2022 (Date of...

www.prnewswire.com > news-releases > announcing-a 

Announcing a Class Action Lawsuit Involving Individuals who ...

Sep 13, 2019 · **Class** Members who request exclusion cannot get any money or benefits from this lawsuit, but will also not be bound by any orders or judgments in this case that may be unfavorabl...

www.sec.gov > litigation > complaints

Class Action Notice
Promoted

GAW Miners or ZenMiner virtual currency product purchasers may be included in a class action settlement.



gawminersclassaction.com

[Learn More](#)

Vote

0

Share

EXHIBIT B

If you purchased certain products from GAW Miners or ZenMiner between August 1, 2014 and January 19, 2015, your rights may be affected by a class action settlement.

NEWS PROVIDED BY

United States District Court, District of Connecticut →

Mar 16, 2023, 09:00 ET

HARTFORD, Conn., March 16, 2023 /PRNewswire/ -- A proposed settlement has been reached in a class action lawsuit called *Denis Marc Audet et al. v. Stuart Fraser et al.*, Case No. 16-CV-940 (MPS) (the "Settlement"). This notice provides a summary of your rights and options. More details are available at www.gawminersclassaction.com.

What is this about? The lawsuit alleges that GAW Miners and ZenMiner made false and misleading statements to potential investors about defendants' virtual currency mining operations. Plaintiffs allege that the Companies sold a progressive array of products and investment contracts to investors that they claimed would yield profits from mining or otherwise investing in virtual currency. Plaintiffs allege that, because the Companies sold far more computing power than they owned and dedicated to virtual currency mining, the Companies owed investors a return larger than any actual return the Companies were making on their limited mining operations. Plaintiffs allege that Mr. Fraser materially assisted the Companies and exercised control over them such that he is liable for any injuries caused by the misconduct allegedly perpetrated by the Companies described above. Mr. Fraser denies all allegations against him; however, both sides have agreed to the Settlement to avoid the cost of further litigation.

Who is affected? You are a Class Member if, between August 1, 2014 and January 19, 2015, you (1) purchased Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC; or (2) acquired Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC, by converting, upgrading, or exchanging other products sold by GAW Miners, LLC and/or ZenMiner, LLC.

What does the Settlement provide? The Settlement provides for cash payments that will be distributed on a pro rata basis from a fund of \$3,500,000. For more details, visit www.gawminersclassaction.com.

What are my options? You can submit a claim form to participate in the Settlement, do nothing, or object to the Settlement.

Submit a claim. To participate in the proposed settlement and receive a payment if you are eligible for payment, you must submit a claim form by July 14, 2023. The claim form informs Settlement Class Counsel that you wish to participate in the proposed settlement. Class Members will receive an email with a link to the claim form. The claim form is also available at www.gawminersclassaction.com.

Do nothing. If you do nothing, you will be included in the Settlement Class, but you will not receive a monetary benefit even if the proposed settlement is approved. If the proposed settlement is approved, you also will not be able to pursue any other lawsuit against Mr. Fraser concerning or relating to the claims alleged in this lawsuit.

Object. You may object or tell the Court what you don't like about the Settlement.

What happens next? The Court will hold a Fairness Hearing on **June 30, 2023 at 2:30pm** at the Abraham Ribicoff Federal Building, United States Courthouse, 450 Main St., Hartford, CT, 06103, to consider whether to approve the Settlement, Class Counsel's attorneys' fees and expenses (not to exceed 33 ⅓% of the Settlement Fund), and Incentive Awards for three Plaintiffs for their service on behalf of the Class. The Court has appointed Susman Godfrey L.L.P. as Class Counsel. Class Counsel will answer any questions that the Court may have. You or your attorney may ask to speak at the hearing at your own expense, but you don't have to.

How do I get more information? For more information and to view the full notice, go to www.gawminersclassaction.com, or contact the Settlement Administrator by writing Audet, et al. v. Fraser, et al., c/o Epiq, P.O. Box 3578, Portland, OR 97208, or calling 1-855-964-0522.

Please do not contact the Court.

SOURCE: United States District Court, District of Connecticut

URL: www.GAWMinersClassAction.com

SOURCE United States District Court, District of Connecticut

EXHIBIT C

From: GAW Miners Settlement Administrator
<info@GAWMinersClassAction.com>
Subject: Proposed GAW Miners Class Action Settlement – Legal Notice

Message:

This message has been authorized by Order of the United States District Court, District of Connecticut in the matter *Audet, et al. vs. Fraser, et al.*, No. 3:16-cv-00940.

Please read this notice carefully.

If you purchased certain products from GAW Miners or ZenMiner between August 1, 2014 and January 19, 2015, your rights may be affected by a class action settlement.

Your rights will be affected by a class action lawsuit pending in the United States District Court, District of Connecticut.

Pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Connecticut, the matter *Audet, et al. vs. Fraser, et al.*, No. 3:16-cv-00940 (the “Action”) has been certified as a class action on behalf of a Settlement Class, except for certain persons and entities who are excluded from the Settlement Class by definition as set forth in the full Notice of Class Action Settlement (available at www.GAWMinersClassAction.com) (the “Notice”).

Plaintiffs have reached a proposed settlement of the Action for \$3,500,000 (the “Settlement”) that, if approved, will resolve all claims in the Action.

A Fairness Hearing will be held on June 30, 2023 at 2:30pm before the Honorable Michael P. Shea at the Abraham Ribicoff Federal Building, United States Courthouse, 450 Main St., Hartford, CT, 06103, to consider whether to approve the Settlement, Class Counsel’s attorneys’ fees and expenses (not to exceed 33⅓% of the Settlement Fund), and Incentive Awards for the Plaintiffs for their service on behalf of the Class.

If you are a member of the Settlement Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Settlement Fund. You should visit www.GAWMinersClassAction.com to review the full Notice and download or fill out the Proof of Claim and Release (“Claim Form”). You may also obtain copies of the Notice and Claim Form by contacting the Settlement Administrator at *Audet, et al. v. Fraser, et al.*, c/o Epiq, PO Box 3578, Portland, OR 97208-3578, 1-855-964-0522.

IMPORTANT DEADLINES

| | |
|----------------------|---|
| July 14, 2023 | To receive a payment under the proposed Settlement: If you are a Settlement Class Member, you must submit a Claim Form through www.GAWMinersClassAction.com or through the mail with a postmark no later than July 14, 2023. If you are a Settlement Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement, but you will nevertheless be bound by any judgments or orders entered by the Court in the Action. |
| May 25, 2023 | To object to the proposed Settlement: Any objections to the fairness, reasonableness, or adequacy of the proposed Settlement must be filed with the Court and delivered to Class Counsel and Defendants' Counsel such that they are <i>filed and served</i> no later than May 25, 2023 in accordance with the instructions set forth in the Notice. |

Please do not contact the Court or the Clerk's Office regarding this notice. All questions about the Notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to the Settlement Administrator.

The Notice, Claim Form, and additional information can be found at www.GAWMinersClassAction.com or by contacting the Settlement Administrator at:

Audet, et al. v. Fraser, et al.
c/o Epiq
P.O. Box 3578
Portland, OR 97208-3578
Toll-Free Number: (855) 964-0522
Email: info@GAWMinersClassAction.com
Website: www.GAWMinersClassAction.com

By Order of the Court

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT
AUDET, et al. v. FRASER, et al.
No. 3:16-cv-00940 (MPS)**

NOTICE OF CLASS ACTION SETTLEMENT

If you purchased certain products from GAW Miners or ZenMiner between August 1, 2014 and January 19, 2015, your rights may be affected by a class action settlement.

A Connecticut Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- To:** All persons or entities who, between August 1, 2014 and January 19, 2015, (1) purchased Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC; or (2) acquired Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC, by converting, upgrading, or exchanging other products sold by GAW Miners, LLC and/or ZenMiner, LLC.
- A proposed settlement has been reached in a class action lawsuit called *Denis Marc Audet et al. v. Stuart Fraser et al.*, Case No. 3:16-CV-00940 (MPS) (the “Settlement”).
 - The lawsuit alleges that GAW Miners and ZenMiner (the “Companies”) made false and misleading statements to potential investors about defendants’ virtual currency mining operations. Plaintiffs allege that the Companies sold a progressive array of products and investment contracts to investors that they claimed would yield profits from mining or otherwise investing in virtual currency. Plaintiffs allege that, because the Companies sold far more computing power than they owned and dedicated to virtual currency mining, the Companies owed investors a return larger than any actual return the Companies were making on their limited mining operations. Plaintiffs allege that Mr. Fraser materially assisted the Companies and exercised control over them such that he is liable for any injuries caused by the misconduct allegedly perpetrated by the Companies described above. Mr. Fraser denies all allegations against him; however, both sides have agreed to the Settlement to avoid the cost of further litigation.
 - If the Court approves the Settlement, Mr. Fraser will fund a cash settlement fund of \$3,500,000. Settlement Class Members will be eligible to receive payment from that cash fund, as further detailed in Questions 8-11.
 - Your legal rights are affected whether or not you act. ***Please read this notice carefully.***

| YOUR LEGAL RIGHTS AND OPTIONS | | |
|--------------------------------------|---|--|
| SUBMIT A CLAIM | <ul style="list-style-type: none"> • Get certain benefits from the Settlement • Be bound by the Settlement • Give up any right to pursue a lawsuit against Stuart Fraser concerning or relating to the claims alleged in this case | Filed by July 14, 2023 |
| DO NOTHING | <ul style="list-style-type: none"> • Be bound by the Settlement • Give up any right to pursue a lawsuit against Stuart Fraser concerning or relating to the claims alleged in this case | |
| OBJECT | <ul style="list-style-type: none"> • Tell the court what you do not like about the Settlement — you will still be bound by the Settlement | Filed and served by May 25, 2023 |

- These rights and options—**and the deadlines to exercise them**—are explained in this notice. The deadlines may be moved, cancelled, or otherwise modified, so please check the Class Website, www.GAWMinersClassAction.com, regularly for updates and further details.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

WHAT THIS NOTICE CONTAINS

TABLE OF CONTENTS

| | Page |
|---|-------------|
| WHAT THIS NOTICE CONTAINS..... | 2 |
| BASIC INFORMATION..... | 3 |
| WHO IS IN THE SETTLEMENT? | 3 |
| SETTLEMENT BENEFITS – WHAT SETTLEMENT CLASS MEMBERS GET | 4 |
| HOW TO GET A PAYMENT | 4 |
| THE LAWYERS REPRESENTING YOU | 5 |
| OBJECTING TO THE SETTLEMENT | 5 |
| THE COURT’S FAIRNESS HEARING..... | 6 |
| IF YOU DO NOTHING | 6 |
| GETTING MORE INFORMATION | 7 |

BASIC INFORMATION

1. Why is there a notice?

You have a right to know about a proposed settlement of a class action lawsuit, and about your rights and options, before the Court decides whether to approve the Settlement.

The Court in charge of this case is the United States District Court for the District of Connecticut (the “Court”), and the case is called *Denis Marc Audet et al. v. Stuart Fraser et al.*, Case No. 3:16-CV-00940 (MPS) (the “Action”). The individuals who sued on behalf of the Class include Plaintiffs Denis Marc Audet, D. Allen Shinnners, and Michael Pfeiffer. The person they sued, Stuart Fraser, is called the Defendant.

2. What is this lawsuit about?

The lawsuit alleges that GAW Miners and ZenMiner (the “Companies”) made false and misleading statements to potential investors about defendants’ virtual currency mining operations. Plaintiffs allege that the Companies sold a progressive array of products and investment contracts to investors that they claimed would yield profits from mining or otherwise investing in virtual currency. Plaintiffs allege that, because the Companies sold far more computing power than they owned and dedicated to virtual currency mining, the Companies owed investors a return larger than any actual return the Companies were making on their limited mining operations. Plaintiffs allege that Mr. Fraser materially assisted the Companies and exercised control over them such that he is liable for any injuries caused by the misconduct allegedly perpetrated by the Companies described above. Mr. Fraser denies all allegations against him; however, both sides have agreed to the Settlement to avoid the cost of further litigation.

3. Why is this a class action?

In a class action, one or more people called Class Representatives sue on behalf of people who have similar claims. All these people are a class or class members. Bringing a case, such as this one, as a class action allows resolution of many similar claims of persons and entities that might be economically too small to bring in individual actions. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a Settlement?

Mr. Fraser denies that he did anything wrong. However, both sides, after many years of litigating the case (including a full trial before a jury), have agreed to the Settlement. Both sides want to avoid the cost and risk of further litigation. The Court has not decided in favor of the Plaintiffs or Mr. Fraser. Plaintiffs and their attorneys think the Settlement is in the best interests of the Settlement Class and is fair, reasonable, and adequate.

WHO IS IN THE SETTLEMENT?

5. Am I part of the Settlement?

The Settlement Class consists of all persons and entities who, between August 1, 2014 and January 19, 2015, (1) purchased Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC; or (2) acquired Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC, by converting, upgrading, or exchanging other products sold by GAW Miners, LLC and/or ZenMiner, LLC.

The Settlement Class **excludes** any person or entity who timely filed a request for exclusion from the Class after the Court certified the lawsuit to proceed as a class action; any defendants; any parent, subsidiary, affiliate, or employee of any defendant; any co-conspirator; and any governmental agency.

6. What if I am still not sure if I am included in the Settlement?

If you are not sure whether you are a Settlement Class Member, or have any other questions about the Settlement, you should visit the Class Website, www.GAWMinersClassAction.com, or call the Settlement Administrator toll-free at 1-855-964-0522.

7. Can I remove myself from the Settlement and sue Mr. Fraser?

If you filed a timely request for exclusion from the Class after the Court certified the lawsuit to proceed as a class action and Counsel issued notice of the Class Action, you are not part of the Settlement. Otherwise, you may not remove yourself from the Class at this point.

SETTLEMENT BENEFITS – WHAT SETTLEMENT CLASS MEMBERS GET

8. What does the Settlement provide?

The Settlement provides monetary compensation to Settlement Class Members. Mr. Fraser will fund \$3,500,000 to be distributed to Settlement Class Members (the “Settlement Fund”).

If you are a Settlement Class Member and you submit a valid and complete claim form for your claim, you may be entitled to receive a *pro rata* share of the Settlement Fund, after certain expenses have been deducted. Before being used to pay any Settlement Class Members, the Settlement Fund will first be used to pay: (1) all settlement administration expenses (excluding certain publication notice expenses); (2) any “Incentive Awards,” which are awards to compensate the named Plaintiffs for efforts they took on behalf of the entire Settlement Class in the litigation; and (3) any Class Counsel’s fees (which will not exceed one-third of the Settlement Fund) and expenses.

The remainder of the Settlement Fund (the “Net Settlement Fund”) will be used to pay the Settlement Class Members on a *pro rata* basis, based on each Settlement Class Member’s claim. A claimant’s *pro rata* share will be calculated as follows. First, your “stake” would be calculated by adding the amount you paid to GAW for the four Qualifying Products listed above (Hashlets, Hashpoints, HashStakers, or Paycoin) to the value of any Hashpoints you obtained through Hashpoint mining (valued at \$0.01 per Hashpoint), then subtracting any value you received from GAW (e.g., in the form of Hashlet payouts) and any value you received from selling the Qualifying Products. Next, your stake would be divided by the combined total stakes of each claimant who submits a claim. Finally, the resulting percentage would be multiplied by the Net Settlement Fund to calculate your share of the Net Settlement Fund. However, a person whose share of the Net Settlement would be less than \$10 will not receive a share of the Settlement.

More details are in documents called the Settlement Agreement and Plan of Distribution, which is available at www.GAWMinersClassAction.com.

HOW TO GET A PAYMENT

9. How can I get a payment?

In order to participate in the proposed settlement and receive a payment if you are eligible for payment, you must submit a claim form. The claim form informs Settlement Class Counsel that you wish to participate in the proposed settlement. Settlement Class Members will receive an email with a link to the claim form. The claim form is also available at www.GAWMinersClassAction.com.

10. When would I get my payment?

Payments will be transmitted to Settlement Class Members after the Court grants “final approval” to the Settlement and after all appeals are resolved. If the Court approves the Settlement, there may be appeals. It’s always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

11. What am I giving up to get a payment in the Settlement?

If you are a Settlement Class Member, you cannot sue Mr. Fraser, continue to sue, or be part of any other lawsuit against Mr. Fraser concerning or relating to the claims released in this Settlement. The Released Claims and Released Parties are defined in the Settlement Agreement. They describe the legal claims that you give up as a Settlement Class Member if the Settlement is approved. The Settlement Agreement is available at www.GAWMinersClassAction.com.

THE LAWYERS REPRESENTING YOU

12. Do I need to hire my own lawyer?

No. The Court has appointed Susman Godfrey L.L.P and Izard, Kindall & Raabe, LLP as Class Counsel. You will not be charged for Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

Class Counsel will file a motion seeking a fee award not to exceed one-third of the Settlement Fund, and reimbursement for all of the expenses they incurred or will incur. Class Counsel will also seek Incentive Awards for each of the named Plaintiffs, to compensate them for efforts they took on behalf of the entire Settlement Class in the litigation.

OBJECTING TO THE SETTLEMENT

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

Any Settlement Class Member may object to the fairness, reasonableness, or adequacy of the proposed Settlement. Settlement Class Members who wish to object to any term of the Settlement must do so, in writing, by filing a written objection with the Court, and serving copies on Class Counsel and Counsel for Defendant.

The written objection must include:

- Your full name, address, telephone number, and email address (if any);
- A written statement of all grounds for the objection accompanied by any legal support for the objection (if any);
- Copies of any papers, briefs, or other documents upon which the objection is based;
- A list of all persons who will be called to testify in support of the objection (if any);
- A statement of whether you intend to appear at the Fairness Hearing;
- A list of any objections by you and/or your counsel in any class action settlement submitted to any state or federal court in the United States in the previous five years; and
- You or your counsel’s signature.

If you intend to appear at the Fairness Hearing through counsel, the written objection must also state the identity of all attorneys representing you who will appear at the Fairness Hearing.

Your objection, along with any supporting material you wish to submit, must be filed with the Office of the Court, with a copy served on Class Counsel and Counsel for Defendant by **May 25, 2023** at the following addresses:

| Clerk of the Court | Class Counsel |
|--|--|
| Office of the Clerk Abraham Ribicoff Federal Building United States Courthouse 450 Main St. Hartford, CT 06103 | Seth Ard Jacob W. Buchdahl Geng Chen Russell F. Rennie Susman Godfrey LLP 1301 Avenue of the Americas 32nd Floor New York, NY 10019 sard@susmangodfrey.com jbuchdahl@susmangodfrey.com gchen@susmangodfrey.com rrennie@susmangodfrey.com Robert A. Izard Doug Needham IZARD, KINDALL & RAABE, LLP 29 S. Main St., Suite 305 West Hartford, CT 06107 rizard@ikrlaw.com dneedham@ikrlaw.com |

| | Counsel for Defendant |
|--|--|
| | Daniel H. Weiner Marc A. Weinstein Amina Hassan Hannah Miller Hughes Hubbard & Reed LLP One Battery Park Plaza New York, NY 10004-1482 daniel.weiner@hugheshubbard.com Rowena A. Moffett David R. Schaefer Sean M. Fisher Brenner, Saltzman & Wallman LLP 271 Whitney Avenue New Haven, CT 06511 rmoffett@bswlaw.com |

THE COURT'S FAIRNESS HEARING

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

The Court will hold a Fairness Hearing on **June 30, 2023 at 2:30pm**, at the Abraham Ribicoff Federal Building, United States Courthouse, 450 Main Street, Hartford, Connecticut 06103.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider the application by Class Counsel for attorneys' fees and reimbursement of expenses and reasonable Incentive Award payments for Plaintiffs. If there are objections, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

16. Do I have to come to the hearing?

No. Class Counsel will answer any questions that the Court may have, but you may come at your own expense. If you submit an objection, you don't have to come to Court to talk about it. As long as you filed and served your written objection on time to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

17. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear." Your request must state your name, address, and telephone number, as well as the name, address, and telephone number of the person that will appear on your behalf. Your request must be filed with the Clerk of the Court and served on Class Counsel and Defendant's Counsel no later than **May 25, 2023**.

Only the Parties, Settlement Class Members, or their counsel may request to appear and be heard at the Fairness Hearing. Persons or entities that have opted out may not request to appear and be heard at the Fairness Hearing.

IF YOU DO NOTHING

18. What happens if I do nothing at all?

If you do nothing, you will be included in the Settlement Class, but you will not receive a monetary benefit even if the proposed settlement is approved. If the proposed settlement is approved, you cannot sue Mr. Fraser, continue to sue, or be part of any other lawsuit against Mr. Fraser concerning or relating to the claims released in this Settlement.

GETTING MORE INFORMATION

19. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement, available at the Class Website, www.GAWMinersClassAction.com. If you have additional questions, you can visit the Class Website or contact the Settlement Administrator:

Audet, et al. v. Fraser, et al.
c/o Epiq
P.O. Box 3578
Portland, OR 97208-3578

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE.



400625909999999999

Audet, et al. v. Fraser, et al.
c/o Epiq
P.O. Box 3578
Portland, OR 97208-3578
Toll-Free Number: (855) 964-0522
Email: info@GAWMinersClassAction.com
Website: www.GAWMinersClassAction.com

PROOF OF CLAIM AND RELEASE

TO BE ELIGIBLE TO RECEIVE A SHARE OF THE NET SETTLEMENT FUND IN CONNECTION WITH THE PROPOSED SETTLEMENT OF THIS ACTION, YOU MUST EITHER (A) MAIL A COMPLETED AND SIGNED PROOF OF CLAIM AND RELEASE FORM (“CLAIM FORM”) TO THE ABOVE ADDRESS VIA PREPAID, FIRST-CLASS MAIL, POSTMARKED ON OR BEFORE JULY 14, 2023, OR (B) COMPLETE AND SUBMIT THE CLAIM FORM THROUGH THE SETTLEMENT WEBSITE, WWW.GAWMINERSCLASSACTION.COM, ON OR BEFORE JULY 14, 2023.

FAILURE TO MAIL OR SUBMIT YOUR CLAIM FORM BY THE DATE SPECIFIED WILL SUBJECT YOUR CLAIM TO REJECTION AND MAY PRECLUDE YOU FROM BEING ELIGIBLE TO RECEIVE ANY MONEY IN CONNECTION WITH THE PROPOSED SETTLEMENT.

DO NOT MAIL OR DELIVER YOUR CLAIM FORM TO THE COURT, THE PARTIES TO THE ACTION, OR THEIR COUNSEL. SUBMIT YOUR CLAIM FORM ONLY TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS SET FORTH ABOVE OR THROUGH THE WEBSITE AT WWW.GAWMINERSCLASSACTION.COM.

PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice of Class Action Settlement (the “Notice”) that accompanies this Proof of Claim Form, including the Plan of Distribution of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Distribution are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. By submitting this Claim Form, you will be making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A SETTLEMENT CLASS MEMBER** (see the definition of the Settlement Class on page 3 of the Notice, which sets forth who is included in and who is excluded from the Settlement Class), **OR IF YOU, OR SOMEONE ACTING ON YOUR BEHALF, PREVIOUSLY SUBMITTED A REQUEST FOR EXCLUSION FROM THE LITIGATION CLASS, DO NOT SUBMIT A CLAIM FORM. YOU MAY NOT, DIRECTLY OR INDIRECTLY, PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A SETTLEMENT CLASS MEMBER.** **THUS, IF YOU ARE EXCLUDED FROM THE SETTLEMENT CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

3. **Submission of this Claim Form does not guarantee that you will share in the proceeds of the Settlement. The distribution of the Net Settlement Fund will be governed by the Plan of Distribution set forth in the Notice, if it is approved by the Court, or by such other plan of distribution as the Court approves.**

4. Use Part III of this form to set forth each account that you had with GAW Miners, LLC and/or ZenMiner, LLC for your transactions in Hashlets, Hashpoints, Hashstakers, or Paycoin.



40062590999999997

5. Use Part IV of this form to set forth (1) your purchases of Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC between August 1, 2014, and January 19, 2015; or (2) your acquisitions of Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC, made by converting, upgrading, or exchanging other products sold by GAW Miners, LLC and/or ZenMiner, LLC between August 1, 2014, and January 19, 2015. Provide all of the requested information with respect to your purchases, acquisitions, and sales of Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC, whether such transactions resulted in a profit or a loss. **Failure to report all requested information during the requested time period may result in the rejection of your claim.**

6. Use Part V of this form to set forth any payments you have received in connection with *United States v. Garza*, Case No. 3:17-cr-158-RNC (D. Conn.), including restitution payments made by Homero Joshua Garza pursuant to the Restitution Order in that case.

7. Epiq, as Settlement Administrator, reserves the right to audit any claims and could request that you submit genuine and sufficient documentation for your transactions in Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC set forth in the Schedule of Transactions in Part IV of this Claim Form. **Please keep a copy of all documents that you send to the Settlement Administrator. Also, please do not highlight any portion of the Claim Form or any supporting documents.**

8. Separate Claim Forms should be submitted for each separate legal entity (e.g., a claim from joint owners should not include separate transactions of just one of the joint owners). Conversely, a single Claim Form should be submitted on behalf of one legal entity including all transactions made by that entity on one Claim Form, no matter how many separate accounts or transactions that entity has.

9. Agents, executors, administrators, guardians, and trustees must complete and sign the Claim Form on behalf of persons represented by them, and they must:

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, Social Security number (or taxpayer identification number), address and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) the transactions in Hashlets, Hashpoints, HashStakers, or Paycoin; and
- (c) furnish herewith evidence of their authority to bind to the Claim Form the person or entity on whose behalf they are acting.

10. By submitting a signed Claim Form, you will be swearing that you:

- (a) transacted in Hashlets, Hashpoints, HashStakers, or Paycoin you have listed in the Claim Form; or
- (b) are expressly authorized to act on behalf of the owner thereof.

11. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of any documents attached thereto, whether submitted now or later in the claims administration process, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

12. If the Court approves the Settlement, payments to eligible Claimants pursuant to the Plan of Distribution (or such other plan of distribution as the Court approves) will be made after any appeals are resolved, and after the completion of all claims processing. The claims process will take substantial time to complete fully and fairly. Please be patient.

13. **PLEASE NOTE:** As set forth in the Plan of Distribution, each eligible Claimant shall receive his, her or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any eligible Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Claimant.



400625909999999997

14. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator, Epiq, at the above address, by email at info@GAWMinersClassAction.com, by toll-free phone from the U.S. and Canada at (855) 964-0522, or you can visit the Settlement website, www.GAWMinersClassAction.com, where copies of the Claim Form and Notice are available for downloading.

IMPORTANT: PLEASE NOTE

IF YOU HAVE FILED A CLAIM ONLINE, YOUR CLAIM IS NOT DEEMED FILED UNTIL YOU RECEIVE AN ACKNOWLEDGEMENT EMAIL. IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT EMAIL WITHIN 60 DAYS, PLEASE CALL THE SETTLEMENT ADMINISTRATOR TOLL-FREE AT (855) 964-0522.

The Settlement Administrator will use this information for all communications regarding this Claim Form. If the information changes, you MUST notify the Settlement Administrator at the address above.

PART II – CLAIMANT IDENTIFICATION

PLEASE COMPLETE THIS PART II IN ITS ENTIRETY. THE SETTLEMENT ADMINISTRATOR WILL USE THIS INFORMATION FOR ALL COMMUNICATIONS REGARDING THIS CLAIM FORM. IF THIS INFORMATION CHANGES, YOU MUST NOTIFY THE SETTLEMENT ADMINISTRATOR IN WRITING AT THE ADDRESS ABOVE.

| | | |
|-------------------------------|----------------------|------------------------------|
| Beneficial Owner's First Name | MI | Beneficial Owner's Last Name |
| <input type="text"/> | <input type="text"/> | <input type="text"/> |

| | | |
|----------------------------------|----------------------|---------------------------------|
| Co-Beneficial Owner's First Name | MI | Co-Beneficial Owner's Last Name |
| <input type="text"/> | <input type="text"/> | <input type="text"/> |

Entity Name (if Beneficial Owner is not an individual)

Representative or Custodian Name (if different from Beneficial Owner[s] listed above)

Address 1 (street name and number)

Address 2 (apartment, unit or box number)

| | | |
|----------------------|----------------------|---|
| City | State | ZIP Code |
| <input type="text"/> | <input type="text"/> | <input type="text"/> - <input type="text"/> |

Country

Last four digits of Social Security Number or Taxpayer Identification Number

Phone Number (Day)

 - -

Phone Number (Evening)

 - -

Email Address

Claimant Account Type (check appropriate box)

- Individual
 Other _____ (please specify)
 Corporation



40062590999999997

PART VI – RELEASE OF CLAIMS AND SIGNATURE***YOU MUST ALSO READ THE RELEASE AND CERTIFICATION BELOW AND SIGN ON PAGE 8 OF THIS CLAIM FORM.***

I (we) hereby acknowledge that, as of the Final Settlement Date of the Settlement, pursuant to the terms set forth in the Joint Stipulation and Settlement Agreement (“Settlement Agreement”), I (we), on behalf of myself (ourselves) and my (our) heirs, executors, administrators, predecessors, successors, affiliates, and assigns, in their capacities as such, shall be deemed to have, and by operation of law and of the Order and Judgment shall have, fully, finally, and forever released, relinquished, and discharged all Releasing Parties’ Released Claims (as defined in the Settlement Agreement and in the Notice) against the Released Parties (as defined in the Settlement Agreement and in the Notice), whether served or unserved with any complaint in the Action, and shall have covenanted not to sue the Released Parties with respect to all such Releasing Parties’ Released Claims, and shall be permanently barred and enjoined from asserting, commencing, prosecuting, instituting, assisting, instigating, or in any way participating in the commencement or prosecution of any action or other proceeding, in any forum, asserting any Releasing Parties’ Released Claims, either directly, representatively, derivatively, or in any other capacity, against any of the Released Parties.

CERTIFICATION

By signing and submitting this Claim Form, the Claimant(s) or the person(s) who represent(s) the Claimant(s) certifies (certify), as follows:

1. that I (we) have read and understand the contents of the Notice and this Claim Form, including the releases provided for in the Settlement Agreement and the terms of the Plan of Distribution;
2. that the Claimant(s) is a (are) Settlement Class Member(s), as defined in the Notice and in paragraph 2 on page 1 of this Claim Form, and is (are) not excluded from the Settlement Class by definition or pursuant to request as set forth in the Notice and in paragraph 2 on page 1 of this Claim Form;
3. that I (we) transacted Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC and have not assigned the claim against the Defendants’ Releasees to another or that, in signing and submitting this Claim Form, I (we) have the authority to act on behalf of the owner(s) thereof;
4. that the Claimant(s) has (have) not submitted any other Claim covering the same purchases/acquisitions of Hashlets, Hashpoints, HashStakers, or Paycoin from GAW Miners, LLC and/or ZenMiner, LLC and knows (know) of no other person having done so on the Claimant’s (Claimants’) behalf;
5. that the Claimant(s) submit(s) to the jurisdiction of the Court with respect to Claimant’s (Claimants’) Claim and for purposes of enforcing the releases set forth herein;
6. that I (we) agree to furnish such additional information with respect to this Claim Form as Lead Counsel, the Settlement Administrator, or the Court may require;
7. that the Claimant(s) waive(s) the right to trial by jury, to the extent it exists, and agree(s) to the Court’s summary disposition of the determination of the validity or amount of the Claim made by this Claim Form;
8. that I (we) acknowledge that the Claimant(s) will be bound by and subject to the terms of any judgment(s) that may be entered in the Action; and
9. that the Claimant(s) is (are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because (a) the Claimant(s) is (are) exempt from backup withholding or (b) the Claimant(s) has (have) not been notified by the IRS that he/she/it is subject to backup withholding as a result of a failure to report all interest or dividends or (c) the IRS has notified the Claimant(s) that he/she/it is no longer subject to backup withholding. **If the IRS has notified the Claimant(s) that he, she, or it is subject to backup withholding, please strike out the language in the preceding sentence indicating that the Claim is not subject to backup withholding in the certification above.**



400625909999999997

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of Claimant

Date: - -
MM DD YYYY

Print your name here

Signature of joint Claimant, if any

Date: - -
MM DD YYYY

Print your name here

If the Claimant is other than an individual, or is not the person completing this form, the following also must be provided:

Signature of person signing on behalf of Claimant

Date: - -
MM DD YYYY

Print your name here

Capacity of person signing on behalf of Claimant, if other than an individual, e.g., executor, president, trustee, custodian, etc. (Must provide evidence of authority to act on behalf of Claimant – see paragraph 13 on page 4 of this Claim Form.)