

**KEW MEDIA GROUP INC.**  
**CLASS ACTION NOTICE OF CERTIFICATION AND OPT OUT DEADLINE**

**TO:** All persons or entities who acquired securities issued by Kew Media Group Inc. in the secondary market between March 28, 2017 to January 16, 2020, inclusive, other than Kew Media Group Inc. and its directors and officers.

**READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.  
YOU MAY NEED TO TAKE PROMPT ACTION.**

**IMPORTANT DEADLINE:**

Opt-Out Deadline (for individuals and entities that wish to exclude themselves from the Class Action. See page 2 for more details.): **January 10, 2022.**

*Opt-Out Forms will not be accepted after this deadline. As a result, it is necessary that you act without delay.*

**CERTIFICATION OF THIS ACTION AS A CLASS PROCEEDING**

On July 20, 2020, an action was commenced in the Ontario Superior Court of Justice against Kew Media Group Inc., and certain of its officers and directors (the “Defendants”). The action alleges that the public filings of Kew Media Group Inc. contained false statements. The action seeks damages arising from a decline in the value of Kew Media Group Inc.’s securities.

The Court has not made a determination on the merits of the Plaintiffs’ claims or the defences that the Defendants will be delivering. The lawyers for the Plaintiffs will have to prove their claims in Court.

On September 27, 2021, the Ontario Superior Court of Justice certified this action as a class action as against the individual defendants, Geoffrey Webb and Steven Silver. This means that the lawsuit meets the requirements for a class action and may proceed to trial.

The Plaintiffs have not yet received leave to pursue their claims against Kew Media Group Inc. under the Ontario *Securities Act*. These claims will not be certified until leave is obtained.

If you are included in the definition of the class, you may have legal rights and options before the Court decides whether the claims being made against Kew Media Group Inc. and the individual defendants on your behalf are correct. This notice explains all of these things.

**WHO IS BOUND BY THE CLASS ACTION?**

The Ontario Superior Court of Justice certified the class action on behalf of the following group (the “Class”):

All persons or entities who acquired securities issued by Kew Media Group Inc. in the secondary market between March 28, 2017 to January 16, 2020 inclusive, other than Kew Media Group Inc., and its directors and officers.

## REQUESTING EXCLUSION FROM THE CLASS

You are automatically part of the Class unless you “opt out” of (exclude yourself from) the action.

If you want to stay in the Class, you do not have to do anything, but you will not be able to make or maintain any other claims or legal proceeding in relation to the matters alleged in this action. There will not be any financial consequences to you if the action is not successful.

If you do not want to be bound by the class action, you must opt out. If you wish to opt out, you may do so by completing an “Opt Out Form”. If you opt out, you will exclude yourself from the class action. If the class action obtains money or other benefits you will not be able to share in them. In order to successfully opt out, you must include all of the information requested by the Opt-Out Form. An incomplete Opt Out Form will not be considered as valid and you will remain in the Class.

This is your only chance to exclude yourself or opt out of the action. If you wish to opt out, you must submit your fully completed Opt-Out Form to Class Counsel at the applicable address noted below, no later than **January 10, 2022**.

Opt-Out Forms are available by contacting Class Counsel.

### THE LAWYERS THAT REPRESENT THE CLASS MEMBERS

The law firms of Kalloghlian Myers <sup>LLP</sup> and Foreman & Company Professional Corporation (“Foreman & Company”) (collectively, “Class Counsel”) jointly represent the Class in the proceedings. Class Counsel will only be paid if they win a trial or if there is a settlement. The Plaintiffs have agreed with Class Counsel that Class Counsel may seek legal fees totalling up to 33% of any judgment or settlement, plus repayment of disbursements and applicable taxes. The Court must approve their request to be paid. The fees and expenses could be deducted from any money obtained for the Class, or paid separately by the defendants. Class Counsel can be reached by mail, email, or by telephone, as provided below:

#### **Foreman & Company**

Attention: Kew Media Class Action  
4 Covent Market Place  
London, ON N6A 1E2  
[info@foremancompany.com](mailto:info@foremancompany.com)  
1 (855) 814-4575

#### **Kalloghlian Myers <sup>LLP</sup>**

Attention: Kew Media Class Action  
250 Yonge Street, Suite 2201  
Toronto, ON M5B 2L7  
[contact@kalloghlianmyers.com](mailto:contact@kalloghlianmyers.com)  
(647) 243-7381

**DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO  
SUPERIOR COURT OF JUSTICE**