

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
No.: 500-06-000785-168

SUPERIOR COURT
(Class Action)

PIERRE DEROME

Plaintiff

v.

THE STARS GROUP INC.
-and-
DAVID BAAZOV
-and-
DANIEL Y. SEBAG
-and-
DIVYESH GADHIA
-and-
HARLAN W. GOODSON
-and-
WESLEY K. CLARK

Defendants

AFFIDAVIT OF PAUL BATTAGLIA
(Sworn October 18, 2022)

25th JS

I, **PAUL BATTAGLIA**, of the City of St. Catharines, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am the President of Trilogy Class Action Services ("**Trilogy**"), the Court appointed Claims Administrator, Opt-Out and Objection Administrator ("**O&O Administrator**") and Notice Administrator in this Action.
2. I submit and swear this affidavit as President and Founder of Trilogy, a class action claims administration, and notice plan firm located in St. Catharines, Ontario, Canada.

3. I have knowledge of the matters to which I hereinafter depose except where stated to be upon information and belief, and where so stated, I have identified the source of my information. Where my knowledge is based on information I have obtained from others, I have so indicated and believe that information to be true.
4. In preparation of this affidavit, I have read and/or reviewed the following documents:
- (a) Settlement Agreement dated November 25th, 2019;
 - (b) Plan of Allocation;
 - (c) Quebec Securities Act ("*QSA*") Section 225;
 - (d) Motion to Authorize a Class for Settlement Purposes, Approve the Notices of Settlement and for other Relief (Articles 575 and 590 C.C.P.)
 - (e) Re-Re Amended Motion for Authorization of a Class Action and for Authorization to bring an Action Pursuant to Section 225.4 of the *Quebec Securities Act*;
 - (f) Affidavit of Cassandra Modafferi dated December 9, 2019;
 - (g) First Order;
 - (h) Second Motion;
 - (i) Second Order;
 - (j) Plan of Notice;
 - (k) All Short-Form and Long-Form Notices;
 - (l) Judgment du 21 janvier 2020 et annexes;
 - (m) Judgment to approve settlement, class counsel fees and other relief, July 8, 2020;
 - (n) Plaintiff's Argument Plan 08 01 2019;
 - (o) Summary of the TMF Decision Dated March 22, 2016;
 - (p) Details of the Insider Trading Scheme Relating to the Potential Acquisition of Oldford;
 - (q) Insider Trading Organizational Chart;
 - (r) Violations of Securities Legislation;
 - (s) Settlement Agreement and Plan of Allocation for Detour Gold Securities;
 - (t) Settlement Agreement and Plan of Allocation for Concordia Securities;
 - (u) Settlement Agreement and Plan of Allocation for Namaste Securities;
 - (v) Settlement Agreement and Plan of Allocation for FSD Pharma Securities.
5. I swear this affidavit in connection with the The Stars Group Inc, (Formally Amaya) Securities Class Action Settlement ("**Amaya**") Plan of Notice and Claims Administration.

6. Subsequently, I submit this affidavit at the request of the Court pursuant to paragraph 39 of the Plan of Allocation and to seek authorization from the Court to proceed with the **“Distribution”** to **“Authorized Claimants”**.
7. I apologize to the Court, the Representative Plaintiff, Class Counsel and the Defendant for the time it has taken to submit this affidavit. The combination of the issues outlined in this affidavit and eventually the disruption to efficient business practices (stay-at-home orders) due to Covid, significantly extended the timeframe to conclude the claims administration and submit this affidavit to the Court. We anticipate Trilogy will move this claims administration more quickly going forward.
8. To that end, the Court will be able to discern that Trilogy has put a considerable amount of time and effort to review all the Court documents, the Quebec Securities Act, other similar securities claims administrations, comparisons with other Settlement Agreements and Plan of Allocations, to produce an opinion, provide the data and empirical information to enable the Court to make an informed decision.
9. Capitalized terms used but not defined in this affidavit have the meanings ascribed to them in the Settlement Agreement dated November 25, 2019, and the schedules and annexes thereto.
10. Capitalized terms used but not defined in this affidavit have the meanings ascribed to them in the Plan of Allocation approved by the Court.

Notice

11. Trilogy issued two press releases regarding the pending settlement on December 20, 2019.
12. Pursuant to the Judgment of this Honourable Court dated January 21, 2020 (the “**First Order**”), the Honourable Courchesne, J.S.C. appointed Trilogy as “**O&O Administrator**” to receive objections and opt-outs to the proposed Settlement from Class Members and to disseminate the Notice of Certification (“**First Notice**”) to putative Class Members. The methods Trilogy employed were within the parameters outlined in the First Order.
13. Trilogy, pursuant to the First Order and the Plan of Notice, published the First Notice on January 25, 2020.
14. Trilogy, at the direction of Class Counsel and the Courts, published the Postponement of the Settlement Hearing Notice on March 27, 2020, to inform putative Class Members that the Settlement Hearing was postponed due to the Covid pandemic.
15. Trilogy, at the direction of Class Counsel and the Courts, published the Revised Notice of Settlement Hearing Notice on June 20, 2020.
16. Pursuant to the Order of this Honourable Court dated July 8, 2020 (the “**Second Order**”), the Honourable Justice Courchesne appointed Trilogy as Claims Administrator to receive and adjudicate Claim Forms for this class action Settlement from Class Members and disseminate the Notice of Settlement (“**Second Notice**”) to putative Class Members. The methods Trilogy employed were within the parameters outlined in the Second Order.
17. Trilogy, pursuant to the Second Order and the Plan of Notice, published the Second Notice on July 21, 2021.

