

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

**SUPERIOR COURT**  
(Class Action)

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**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

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**PLAN OF NOTICE (article 579 CCP)**

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1. For the purposes of this plan of notice ("**Plan of Notice**"), except to the extent that they are modified in this Plan of Notice, the definitions set out in the Agreement apply to and are incorporated into this Plan of Notice.
2. Class Counsel has posted information about the nature and status of the Action in both English and French at <http://faguyco.com/portfolio/amaya-class-action> and has created a dedicated website ("**Website**") for general information purposes that will be administered by Trilogy Class Action Services ("**Administrator**"). The information posted on the Website will be updated regularly. Copies of important publicly available court documents, decisions, notices and other information relating to the Class Action are or will be accessible on the Website.
3. The Website also:
  - i) contains a bilingual communication interface, a feature that allows Class Members to submit inquiries in both languages to the Administrator. These inquiries will be received by the Administrator and if required, a designated member of the Class Counsel team who will promptly respond to them; and

- ii) provides information in both languages enabling Class Members to contact the Administrator and Class Counsel free of charge should they wish to make an inquiry in person.
4. Class Counsel will retain the services of the Administrator to administer the Plan of Notice in both languages.

#### **NOTICE OF AUTHORIZATION AND OPT-OUT PROCEDURE**

5. Bilingual notices ("**First Notice**"), attached hereto as **Schedule "A"** (English) and "**B**" (French) and bilingual notices ("**Second Notice**"), attached hereto as **Schedule "C"** (English) and "**D**" (French) (collectively, "**Notices**"), will be disseminated to the public.
6. The First Notice shall be disseminated along with the Opt-Out Form as follows:
- (a) Class Counsel shall publish the First Notice in English in at least ¼ page size in the business/legal section of the *National Post* and the *Montreal Gazette*;
  - (b) Class Counsel shall publish the First Notice in French in at least ¼ page size in the business/legal section of *La Presse*;
  - (c) Class Counsel shall disseminate a press release advising of the authorization for settlement purposes and settlement, and the procedure to object to the settlement or opt-out of the Action;
  - (d) Class Counsel shall post the First Notice in English and French on the website [www.faguyco.com](http://www.faguyco.com);
  - (e) The Stars Group Inc. shall post the First Notice in English and French in the investor relations section of its website;
  - (f) By publishing on the *Registre des actions collectives*; and
  - (g) Class Counsel shall display internet banners containing abbreviated notice content as well as an embedded link to the website for 10 (ten) days on Post Media (The National Post and the Montreal Gazette) and on La Presse's website
7. The Second Notice shall be disseminated as follows:
- (a) Class Counsel shall publish the Second Notice in English in at least ¼ page size in the business/legal section of the National Post and the Montreal Gazette;
  - (b) Class Counsel shall publish the Second Notice in French in at least ¼ page size in the business/legal section of La Presse;
  - (c) Class Counsel shall disseminate a press release advising of the settlement approval, and the procedure to file a claim form;

- (d) Class Counsel shall post the Second Notice in English and French on the website at [www.faguyco.com](http://www.faguyco.com);
  - (e) Class Counsel shall publish the Second Notice on the Registre des actions collectives; and
  - (f) The Stars Group Inc. shall post the Second Notice in English and French in the investor relations section of its website.
8. No later than 10 business days after the date of entry of the Judgment authorizing the Plan of Notice, the Administrator shall cause copies of the First Notice to be sent by electronic mail to the brokers identified in **Schedule "E"** ("Brokers"), attached hereto, requesting that, within 14 business days of receipt of the First Notice from the Administrator, the Broker forward a copy of the First Notice to all persons or entities for whose benefit the Broker purchased or otherwise acquired TSGI's Eligible Securities outside the United States during the Class Period ("**Beneficial Owners**"). For those Beneficial Owners whose email addresses are known to the Broker, the Broker may forward the First Notice by email. The Brokers who elect to send the First Notice to their Beneficial Owners shall send a statement to the Administrator confirming that the mailing, by email or regular mail, was made and shall retain their mailing records for use in connection with any further notices that may be provided in the Action. The Brokers shall post the First Notice on internal electronic bulletin boards to their retail investors, their institutional investors, internal investment advisor and portfolio manage network. The Administrator will forward to third-party claims filing firms and compliance firms to electronically notify their financial institution client base. Upon full compliance with this provision, the Brokers may seek reimbursement of their reasonable expenses actually incurred and combined with this Order by providing the Administrator with proper documentation supporting the expenses for which reimbursement is sought, provided that the Brokers may only cumulatively request up to \$15,000 in total for the expenses relating to the distribution of the First Notice to Beneficial Owners. If the amounts submitted in the aggregate exceed \$15,000, each Broker's claim shall be reduced on a *pro rata* basis. Each brokerage firm must submit its account by the specified date in order to be entitled to a pro rata payment within ten business days of sending of notice.

MONTREAL, this     day of     , 2019

(S) *Faguy & Co.*

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FAGUY & CO.  
Attorneys for Class Counsel