

CLASS ACTION

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

No: 500-06-000578-118

MITCHELL SCHNURBACH
Petitioner

v.

VANTAGE LTD.
TILTWARE LLC
POCKET KINGS LTD.
POCKET KINGS CONSULTING LTD.
RANSTON LTD.
MAIL MEDIA LTD.
Corporate Respondents

-and-

HOWARD LEDERER
CHRIS FERGUSON
RAYMOND BITAR
NELSON BURTNICK
Individual Respondents

NOTICE TO MEMBERS

1. TAKE NOTICE that a class action was authorized on January 21, 2013 by a judgment rendered by the Honourable Mr. Justice Pierre-C. Gagnon of the Superior Court of Quebec, District of Montreal, on behalf of the following group:

"All residents in Quebec who had money being held in their Full Tilt Poker Player Accounts from June 29, 2011 until November 6, 2012";
2. The class action will be instituted in the judicial district of Montreal;
3. The status of representative to the class action was attributed to Mitchell Schnurbach;
4. The addresses of the Defendants are:

VANTAGE LTD., TILTWARE LLC, POCKET KINGS LTD., POCKET KINGS CONSULTING LTD., RANSTON LTD., MAIL MEDIA LTD., care of E. NIKI WARIN, attorney at COZEN O'CONNOR, practicing her profession at 45 Broadway, 16th Floor, New York, New York, 10006, USA

HOWARD LEDERER, CHRIS FERGUSON, care of ALAIN JEFFREY IFRAH, attorney at IFRAH PLLC, practising his profession at 1717 Pennsylvania Avenue, Suite 650, Washington, D.C., 20006-2004, USA

RAYMOND BITAR, 501 Gordon Highlands Road, Glendora, California, 91741, USA

NELSON BURTNICK, 10866 Wilshire Boulevard, 4th Floor, Los Angeles, California, 90024, USA

5. The principle questions of fact and law to be treated collectively are the following:

- a) Did the Respondents against whom authorization to sue is given, block access to Class Members' Full Tilt Player Accounts?
- b) Did these Respondents refuse to return Class Members' money that they were entrusted with to hold?
- c) Did the Respondents participate in the conduct or the affairs of Full Tilt, and, if so, what was the nature of such participation?
- d) Are the Respondents liable to pay interest at the legal rate or otherwise on the amounts of money owed to Class Members that were held in their Full Tilt Player Accounts between the period of June 29, 2011 and November 6, 2012?

6. The conclusions sought by the class action to be instituted are the following:

GRANT the class action of the Petitioner and each of the members of the group;

DECLARE the Defendants solidarily liable for the damages of the Petitioner and each of the members of the group;

CONDEMN the Defendants to pay to each member of the group interest at the legal rate or otherwise plus the legal indemnity on the amounts of money owed to Group Members that were held in their Full Tilt Player Accounts between June 29, 2011 and November 6, 2012, and ORDER collective recovery of these sums;

ORDER the Defendants to deposit in the office of this court the totality of the sums which forms part of the collective recovery, with interest and costs;

ORDER that the claims of individual group members be the object of collective liquidation if the proof permits and alternately, by individual liquidation;

CONDEMN the Defendants to bear the costs of the present action including expert and notice fees;

RENDER any other order that this Honourable court shall determine and that is in the interest of the members of the group;

7. The class action to be brought will be in the form of a motion to institute proceedings in damages;
8. Any members of the class that have not requested their exclusion in the manner described below, will be bound by any judgement to be rendered on the class action;
9. The date after which any members of the class can no longer exclude themselves, without special permission, was fixed for April 15, 2013;
10. Any members, who have not already brought a suit, can exclude themselves by advising the clerk of the Superior Court in the district of Montreal, by registered or certified mail at 1 Notre-Dame St. East, Montreal, Quebec, H2Y 1B6, before the expiry of the time limit for exclusion;
11. Any members who have brought suit on issues similar to those upon which the final judgment on the demand of the representative would decide, are deemed to have requested exclusion from the class if they do not, before the expiry of the time limit for exclusion, discontinue their action;
12. A member of the class who is not a representative or an intervener cannot be called upon to pay the costs of the class action;
13. Any member may have their intervention received by the court if it is considered useful to the class;

For more information on the present class action, you may contact:

Me Jeff Orenstein
CONSUMER LAW GROUP INC.
4150, Sainte-Catherine St. West, Suite 330
Montreal, Quebec, H3Z 2Y5
(514) 266-7863 ext. 220 or 1-888-909-7863
www.clg.org
jorenstein@clg.org

This notice has been approved by the Superior Court of Quebec.