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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ALMA SUE CROFT, individually and on behalf of all others similarly situated,

Plaintiff,

Case No. 2:20-cv-01310-RSM

SPINX GAMES LIMITED, GRANDE GAMES LIMITED, and BEIJING BOLE TECHNOLOGY CO., LTD.,

Defendants.

DECLARATION OF RYAN BAHRY **REGARDING SETTLEMENT ADMINISTRATION**

I, RYAN BAHRY, declare and state as follows:

- I am an Assistant Director at JND Legal Administration ("JND"). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class actions.
- JND is serving as the Settlement Administrator¹ in the above-captioned litigation ("Action"), as ordered by the Court in its Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement Agreement, dated March 31, 2022 (the

Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Class Action Settlement Agreement.

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3. This Declaration is based on my personal knowledge and information provided to me by experienced JND employees and, if called on to do so, I could and would testify competently thereto.

CAFA NOTICE

- 4. In compliance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, JND compiled a CD-ROM with the following documents:
 - a. Class Action Complaint, filed September 1, 2020;
 - b. First Amended Class Action Complaint, filed April 9, 2021;
 - Plaintiff's Motion for Preliminary Approval of Class Action Settlement, filed February 15, 2022;
 - d. Class Action Settlement Agreement, filed February 15, 2022;
 - e. [Proposed] Claim Form, filed February 15, 2022;
 - f. [Proposed] Email Notice, filed February 15, 2022;
 - g. [Proposed] Postcard Notice, filed February 15, 2022;
 - h. [Proposed] Website Notice, filed February 15, 2022;
 - i. [Proposed] Plan of Allocation, filed February 15, 2022;
 - j. Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 24, 2022; and
 - k. Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 31, 2022.
- 5. The CD-ROM was mailed on April 11, 2022, to the appropriate Federal and State officials identified in the attachment with an accompanying cover letter, a copy of which is attached hereto as **Exhibit A**.

CLASS MEMBER DATA

6. On April 27, 2022, JND received seven (7) spreadsheets from Defendants for each game application containing, among other information, the Player ID, User ID, purchase amounts, terms of acceptance agreement date, and e-mail address (where applicable) for a total of 95,948 unique Settlement Class Member Player IDs.

- 7. Between July 26, 2022, and August 11, 2022, JND received a spreadsheet from the Amazon, Apple, and Google platforms, containing, among other information, the names, mailing addresses (where applicable), e-mail addresses (where applicable), and purchase amounts for a total of 87,324 unique Settlement Class Members. JND used the information contained in the platform data to send Notice to Settlement Class Members.
- 8. Prior to mailing notices, JND analyzed the raw data to consolidate duplicate records within the spreadsheets and determined a total of 87,324 unique Settlement Class Members. Prior to noticing, JND updated the Settlement Class Member contact information (where available) using data from the National Change of Address ("NCOA") database.² The Settlement Class Member data was promptly loaded into a secure database established for this Action.

DIGITAL AD CAMPAIGN

9. On August 19, 2022, JND caused the digital effort to launch with Google Display Network ("GDN"), Facebook and Instagram. The digital effort concluded on September 15, 2022, delivering 3,330,392 impressions to adults 18 years of age or older in Washington state ("WA Adults 18+"), 130,392 impressions more than what was originally planned. A portion of the impressions

² The NCOA database is the official United States Postal Service ("USPS") technology product which makes changes of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained on the database for 48 months.

was targeted toward a custom segment focusing on users who have used similar apps to Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Casino, Cash Bash, and Jackpot Crush on GDN, and a portion was allocated toward users who have visited Facebook gaming and/or showed interest in casino games, Jackpot Party Casino community, and mobile/online gambling on Facebook and Instagram.

10. The digital ads were served across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile. Screenshots of the Digital Notices as they appeared on GDN, Facebook and Instagram are attached as **Exhibit B**.

E-MAIL NOTICE

- 11. Pursuant to the terms of the Settlement Agreement, on August 19, 2022, JND sent the customized, Court-approved e-mail notice ("E-mail Notice") via e-mail from an established case inbox (info@GrandeGamesSettlement.com) to 85,432 unique Settlement Class Members with a valid e-mail address (1,892 Settlement Class Members were excluded from the e-mail campaign as they did not have a valid e-mail address). A representative sample of the E-mail Notice is attached hereto as **Exhibit C**.
- 12. As of the date of this Declaration, JND tracked 3,021 E-mail Notices that were returned to JND as undeliverable.

POSTCARD NOTICE

13. Pursuant to the terms of the Settlement Agreement, on August 19, 2022, JND mailed the Court-approved postcard notice ("Postcard Notice") via USPS first-class mail to 6,704 unique Settlement Class Members with a Lifetime Spending Amount greater than \$100.00. A representative sample of the Postcard Notice is attached hereto as **Exhibit D**.

- 14. As of the date of this Declaration, JND tracked 601 Postcard Notices that were returned to JND as undeliverable. Of these 601 undeliverable Postcard Notices, 125 were remailed to forwarding addresses provided by the USPS and JND conducted additional advanced address research through TransUnion and received updated address information for an additional 339 Class Members. JND promptly re-mailed Postcard Notices to these 339 Class Members (of which 38 were returned as undeliverable).
- 15. As of the date of this Declaration, 84,426 Class Members were e-mailed a Notice or mailed a Postcard Notice that was not returned as undeliverable, representing 96.7% of the total Settlement Class.

SETTLEMENT WEBSITE

- 16. On March 31, 2022, JND established a Settlement Website (www.GrandeGamesSettlement.com), which hosts copies of important case documents, including the Class Action Settlement Agreement, Class Notice, answers to frequently asked questions, and contact information for the Administrator. Additionally, the Settlement Website allows Class Members to File a Claim Form electronically or estimate their payment amount through the Settlement Payment Estimate Calculator.
- 17. On October 24, 2022, Class Counsel filed its Motion for Award of Attorneys' Fees and Expenses and Issuance of Incentive Award, which JND made promptly available on the Settlement Website that same day.
- 18. As of the date of this Declaration, the Settlement Website has tracked 10,462 unique users with over 52,658 page views. JND will continue to update and maintain the Settlement Website throughout the administration process.

TOLL-FREE INFORMATION LINE

- 19. On March 31, 2022, JND established a case-specific toll-free number, 1-877-540-0582, for Settlement Class Members to call to obtain information regarding the Settlement. Callers have the option to listen to the Interactive Voice Response ("IVR") system which directs Settlement Class Members to the Settlement Website. The toll-free number is accessible 24 hours a day, seven (7) days a week.
- 20. As of the date of this Declaration, the toll-free number has received 71 incoming calls. JND will continue to maintain the toll-free number throughout the settlement administration process.

REQUESTS FOR EXCLUSION

- 21. The E-mail Notice and Postcard Notice informed recipients that any Class Member who wished to exclude themselves from the proposed Settlement ("opt-out") must do so by mailing an exclusion letter to the Settlement Administrator, postmarked on or before November 7, 2022.
- 22. As of the date of this Declaration, JND has received two (2) timely exclusion requests from Class Members Christine Aden (Tumwater, WA) and Joshua McDonald (Portland, OR).

OBJECTIONS

- 23. The E-mail Notice and Postcard Notice informed recipients that any Class Member who wished to object to the proposed Settlement could do so by filing a written objection with the Court, postmarked on or before November 7, 2022.
- 24. As of the date of this Declaration, JND has not received, and is not aware of, any objections.

CLAIM FORMS RECEIVED

- 25. The E-mail Notice and Postcard Notice informed recipients that Settlement Class Members must file a Claim Form if they wish to receive a payment from the Settlement, and that those wishing to do so, could file a Claim Form on the Settlement Website, or by mailing a copy of the Claim Form to JND, postmarked or submitted on or before January 26, 2023. A representative sample of the Claim Form is attached hereto as **Exhibit E**.
- 26. Pursuant to the Settlement, thirty days prior to the Claims Deadline, JND will send Reminder Notice (substantially in the form of Exhibit C hereto) to all Class Members for whom a valid email address is available, with an electronic link to the Claim Form.
- 27. As of the date of this Declaration, JND has received 3,344 Claim Forms (3,295 electronic and 49 mailed). JND is in the process of receiving, reviewing, and validating the submitted Claim Forms on an ongoing basis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 21, 2022 in Seattle, Washington.

Ryan Bahry

EXHIBIT A



April 8, 2022

United States Attorney General and the Appropriate Officials Identified in Attachment A

RE: CAFA Notice of Proposed Class Action Settlement

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715 on behalf of SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd., the defendants in the below-referenced class action ("the Action"). Plaintiff's Motion for Preliminary Approval of Class Action Settlement was filed with the Court on February 15, 2022, and the Court entered its Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement on March 24, 2022. The Court has scheduled the final settlement approval hearing on September 8, 2022 at 9:00 a.m.

Case Name: Heathcote v. SpinX Games Limited, et al.

Case Number: 2:20-cv-01310-RSM

Jurisdiction: United States District Court for the Western District of Washington

Date Settlement filed February 15, 2022

with Court:

Copies of all materials filed in the above-named actions are electronically available on the Court's Pacer website found at https://pcl.uscourts.gov. Additionally, in compliance with 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

01 - Complaint.pdf

Class Action Complaint, filed September 1, 2020

02 - Amended Complaint.pdf

First Amended Class Action Complaint, filed April 9, 2021

03 - Motion for Preliminary Approval.pdf

Plaintiff's Motion for Preliminary Approval of Class Action Settlement, filed February 15, 2022

04 - Settlement Agreement.pdf

Class Action Settlement Agreement, filed February 15, 2022

05 - Claim Form.pdf

[Proposed] Claim Form, filed on February 15, 2022

06 - Email Notice.pdf

[Proposed] Email Notice, filed on February 15, 2022

07 - Postcard Notice.pdf

[Proposed] Postcard Notice, filed on February 15, 2022

08 - Website Notice.pdf

[Proposed] Website Notice, filed February 15, 2022

09 - Plan of Allocation.pdf

[Proposed] Plan of Allocation, filed February 15, 2022

10 - Preliminary Approval Order.pdf

Order Granting Plaintiff's Motion for Preliminarily Approval of Class Action Settlement, entered March 24, 2022

11 - Amended Preliminary Approval Order.pdf

Amended Order Granting Plaintiff's Motion for Preliminarily Approval of Class Action Settlement, entered March 31, 2022

It is not possible to provide a breakdown of the Settlement Class in accordance with 28 U.S.C. § 1715 (b)(7) at this time. However, we anticipate that the Settlement Class is sufficiently numerous as to include Class Members potentially residing in all 50 U.S. states, as well as the District of Columbia, and may include Class Members residing in U.S. territories and associated states.

There are no other settlements or agreements made between Counsel for the parties related to the class defined in the proposed settlement, and as of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.

If you have any questions regarding the details of the case and settlement, please contact Defense Counsel's representative at:

Ajay S. Krishnan Michelle Ybarra Keker, Van Nest & Peters LLP 633 Battery Street San Francisco, CA 94111 Tel: (415) 391-5400 akrishnan@keker.com mybarra@keker.com

For questions regarding this Notice, please contact JND at:

JND Class Action Administration 1100 2nd Ave, Suite 300 Seattle, WA 98101 Phone: 800-207-7160

Regards,

JND Legal Administration

Encl.

Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (W.D. Wash.) CAFA Notice - Attachment A - Service List

Treg R. Taylor Office of the Attorney General 1031 W 4th Ave Ste 200 Anchorage, AK 99501

Leslie Rutledge Office of the Attorney General 323 Center St Ste 200 Little Rock, AR 72201

CAFA Coordinator Office of the Attorney General Consumer Protection Section 455 Golden Gate Ave., Ste 11000 San Francisco, CA 94102

William Tong
Office of the Attorney General
165 Capitol Ave
Hartford, CT 06106

Ashley Moody
Office of the Attorney General
State of Florida
PL-01 The Capitol
Tallahassee, FL 32399

Holly T. Shikada Department of the Attorney General 425 Queen Street Honolulu, HI 96813

Lawrence G. Wasden Office of the Attorney General 700 W. Jefferson St, Suite 210 Boise, ID 83720 Steve Marshall Attorney General's Office 501 Washington Ave Montgomery, AL 36104

Mark Brnovich Office of the Attorney General 2005 N Central Ave Phoenix, AZ 85004

Phil Weiser Office of the Attorney General Ralph L. Carr Judicial Building 1300 Broadway, 10th Fl Denver, CO 80203

Kathy Jennings Delaware Department of Justice Carvel State Office Building 820 N French Street Wilmington, DE 19801

Chris Carr Office of the Attorney General 40 Capitol Sq SW Atlanta, GA 30334

Thomas J. Miller Office of the Attorney General Hoover State Office Building 1305 E. Walnut Street Rm 109 Des Moines, IA 50319

Kwame Raoul Office of the Attorney General James R. Thompson Center 100 W. Randolph St Chicago, IL 60601

Case 2:20-cv-01310-RSM. Document 78 Filed 11/21/22 Page 12 of 34 Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (W.D. Wash.) CAFA Notice - Attachment A - Service List

Todd Rokita Office of the Attorney General Indiana Government Center South 302 W Washington St 5th Fl Indianapolis, IN 46204

Daniel Cameron Office of the Attorney General Capitol Building 700 Capitol Ave Ste 118 Frankfort, KY 40601

CAFA Coordinator General Counsel's Office Office of Attorney General One Ashburton Pl, 20th Floor Boston, MA 02108

Aaron Frey Office of the Attorney General 6 State House Station Augusta, ME 04333

Keith Ellison
Office of the Attorney General
445 Minnesota St
Suite 1400
St. Paul, MN 55101

Lynn Fitch
Office of the Attorney General
Walter Sillers Building
550 High St Ste 1200
Jackson, MS 39201

Josh Stein Attorney General's Office 114 W Edenton St Raleigh, NC 27603 Derek Schmidt
Office of the Attorney General
120 SW 10th Ave
2nd Fl
Topeka, KS 66612

Jeff Landry Office of the Attorney General 1885 N. Third St Baton Rouge, LA 70802

Brian E. Frosh Office of the Attorney General 200 St. Paul Pl Baltimore, MD 21202

Dana Nessel Department of Attorney General G. Mennen Williams Building, 7th Fl 525 W Ottawa St Lansing, MI 48933

> Eric Schmitt Attorney General's Office Supreme Court Building 207 W High St Jefferson City, MO 65101

Austin Knudsen Office of the Attorney General Justice Building, Third Fl 215 N. Sanders Helena, MT 59601

Drew H . Wrigley Office of the Attorney General State Capitol, 600 E Boulevard Ave Dept. 125 Bismarck, ND 58505

Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (W.D. Wash.) CAFA Notice - Attachment A - Service List

Doug Peterson Attorney General's Office 2115 State Capitol Lincoln, NE 68509

Matthew J. Platkin Office of the Attorney General Richard J. Hughes Justice Complex 25 Market St 8th Fl, West Wing Trenton, NJ 08611

Aaron Ford Office of the Attorney General Old Supreme Court Building 100 N Carson St Carson City, NV 89701

Dave Yost Attorney General's Office State Office Tower 30 E Broad St 14th Fl Columbus, OH 43215

Ellen F. Rosenblum Oregon Department of Justice Justice Building 1162 Court St NE Salem, OR 97301

Peter F. Neronha Office of the Attorney General 150 S Main St Providence, RI 02903

Jason Ravnsborg
Office of the Attorney General
1302 E Highway 14
Ste 1
Pierre, SD 57501

John Formella
Office of the Attorney General
NH Department of Justice
33 Capitol St.
Concord, NH 03301

Hector Balderas
Office of the Attorney General
Villagra Building
408 Galisteo Street
Santa Fe, NM 87501

CAFA Coordinator
Office of the Attorney General
28 Liberty St
15th Fl
New York, NY 10005

John O'Connor Office of the Attorney General 313 NE 21st St Oklahoma City, OK 73105

Josh Shapiro PA Office of the Attorney General Strawberry Square 16th Fl Harrisburg, PA 17120

Alan Wilson Office of the Attorney General Rembert C. Dennis Bldg 1000 Assembly St Rm 519 Columbia, SC 29201

Herbert H. Slatery, III Office of the Attorney General 500 Dr Martin L King Jr Blvd Nashville, TN 37219

Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (W.D. Wash.) CAFA Notice - Attachment A - Service List

Ken Paxton Office of the Attorney General 300 W. 15th St Austin, TX 78701

Jason S. Miyares
Office of the Attorney General
202 N. Ninth St.
Richmond, VA 23219

Bob Ferguson Office of the Attorney General 1125 Washington St SE Olympia, WA 98501

Patrick Morrisey Office of The Attorney General State Capitol, 1900 Kanawha Blvd E Building 1 Rm E-26 Charleston, WV 25305

Karl A. Racine Office of the Attorney General 400 6th St NW Washington, DC 20001

Fainu'ulelei Falefatu Ala'ilima-Utu Department of Legal Affairs Exec Ofc Bldg, 3rd Fl P.O. Box 7 Utulei, AS 96799

Edward Manibusan
Office of the Attorney General
Administration Building
P.O. Box 10007
Saipan, MP 96950

Sean D. Reyes Office of the Attorney General Utah State Capitol Complex 350 North State St Ste 230 Salt Lake City, UT 84114

T.J. Donovan Attorney General's Office 109 State St. Montpelier, VT 05609

Josh Kaul Attorney General's Office P.O. Box 7857 Madison, WI 53707

Bridget Hill
Office of the Attorney General
State Capitol Building
200 W 24th St
Cheyenne, WY 82002

Merrick Garland
Office of the U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530

Leevin Taitano Camacho Office of the Attorney General Administration Division 590 S Marine Corps Dr, Suite 901 Tamuning, GU 96913

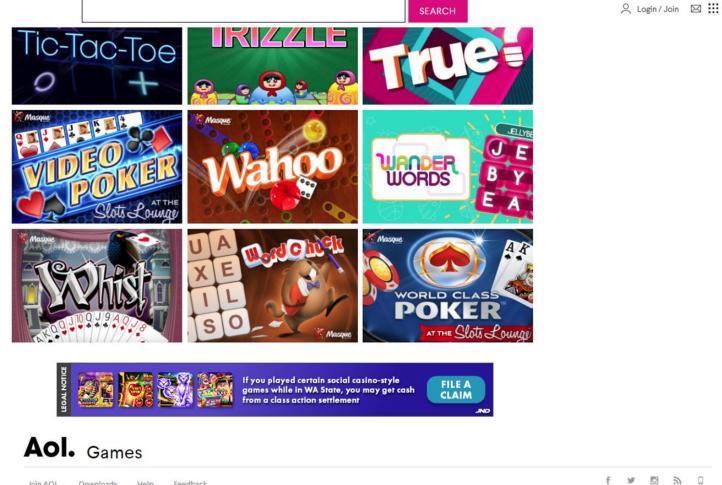
Domingo Emanuelli Hernández Dpto. de Justicia de Puerto Rico Calle Teniente César González 677 Esq. Ave. Jesús T. Piñero San Juan, PR 00918

Case 2:20-cv-01310-RSM. Document 78. Filed 11/21/22. Page 15 of 34 Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (W.D. Wash.) CAFA Notice – Attachment A – Service List

Denise N. George Office of the Attorney General 3438 Kronprindsens Gade GERS Building 2nd Fl St. Thomas, VI 00802 Joses R. Gallen
Department of Justice
P.O. Box PS-105
Palikir
Pohnpei State, FM 96941

Richard Hickson, Attorney General C/O Marshall Islands Embassy 2433 Massachusetts Ave NW Washington, DC 20008 Ernestine K. Rengiil Office of the Attorney General P.O. Box 1365 Koror, PW 96940

EXHIBIT B



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Mail

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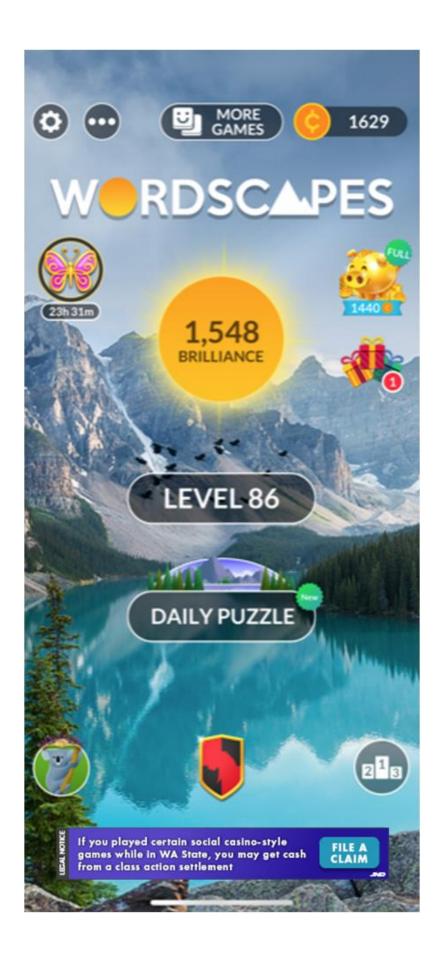
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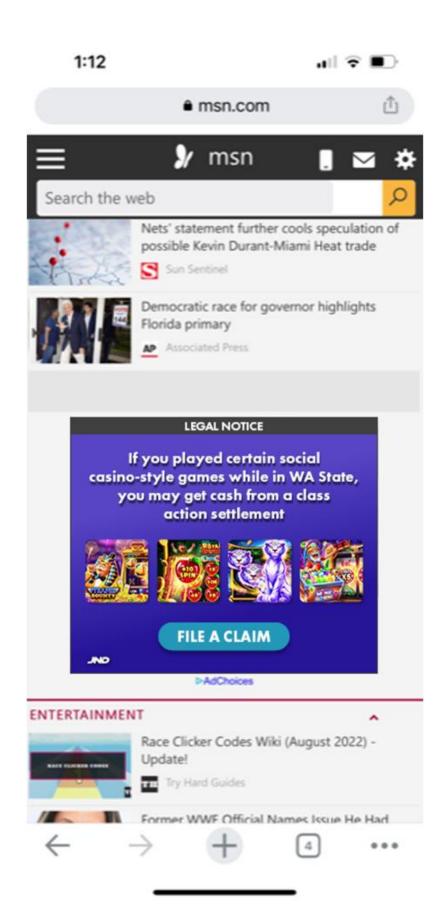
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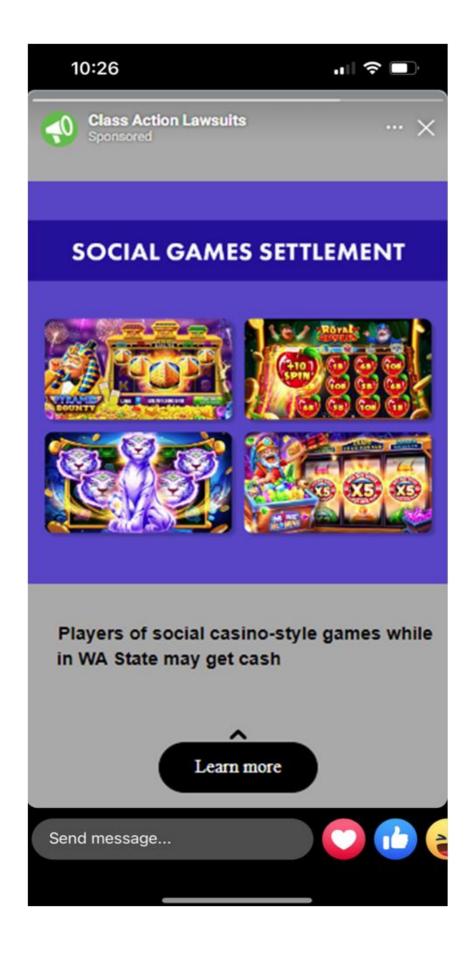


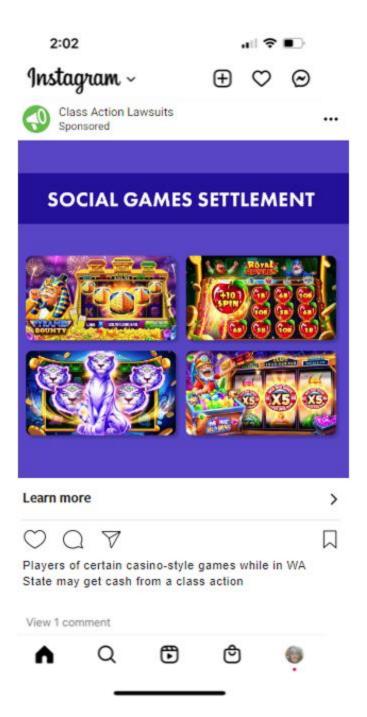














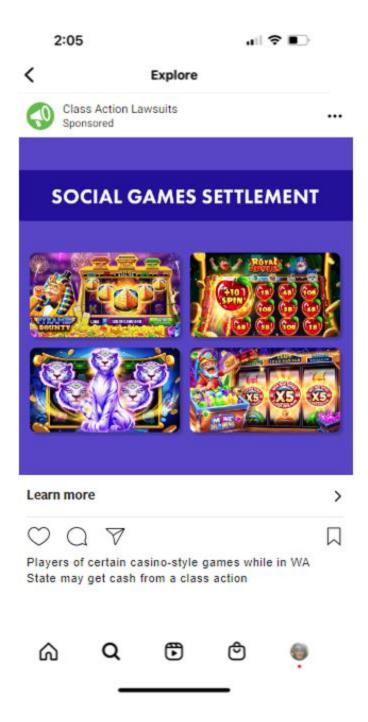


EXHIBIT C

From: Jennifer@GrandeGamesSettlement.com

To: JonQClassMember@domain.com

Re: Legal Notice of Class Action Settlement

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM (United States District Court for the Western District of Washington)

Unique ID: [Name Number]

If you played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, Cash Bash, or Jackpot Crush you may be part of a class action settlement

A court authorized this notice. You are <u>not</u> being sued. This is <u>not</u> a solicitation from a lawyer.

This notice is to inform you of the settlement of a class action lawsuit against SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd. ("Defendants"), alleging claims based on the sale of virtual chips in the following social casino-style games: Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush. Defendants deny all claims and that they violated the law, but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

<u>Am I a Class Member?</u> Our records indicate you may be a Settlement Class Member. Settlement Class Members are persons who played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush, on or before January 31, 2022, while located in the state of Washington.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$3,500,000 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses as well as any attorneys' fees, costs, and incentive award to the Class Representative awarded by the Court. If you are entitled to relief, you may submit a claim to receive a share of the Settlement Fund. Your share will be depend on, among other things, (1) the total dollar amount of in-game purchases you made while playing the Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, and/or other SpinX Social Casino Games, with those who spent more money receiving a higher percentage back, (2) whether or not your claims are potentially subject to the Dispute Resolution and Arbitration Provision in Defendants' Terms of Service, and (3) how many Settlement Class Members submit claims. You can find more information, and estimate your share of the Settlement Fund, at www.GrandeGamesSettlement.com.

<u>How Do I Get a Payment?</u> To receive a payment, you must submit a timely and complete Claim Form by mail or online, submitted or postmarked **no later than January 26, 2023**. You can submit the claim form online at www.GrandeGamesSettlement.com. You may also request a paper claim form and mail it to Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the settlement administrator no later than November 7, 2022. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your written objection must be filed no later than November 7, 2022. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.GrandeGamesSettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims relating to the allegations in this case against Defendants and any other Released Parties will be released.

<u>Who Represents Me?</u> The Court has appointed lawyers from Bursor & Fisher, P.A. to represent the class. These attorneys are called "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Plaintiff Alma Sue Croft is a Settlement Class Member and the Court appointed her as "Class Representative."

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at 9:00 a.m. PST on December 1, 2022 in United States District Court for the Western District of Washington, 700 Stewart Street, Seattle, WA 98101. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representative \$5,000 from the Settlement Fund for his services in helping to bring and settle this case. Class Counsel will be paid from the Settlement Fund in an amount to be determined and awarded by the Court. Class Counsel will seek no more than 25% of the Settlement Fund in attorneys' fees, plus reimbursement of reasonable costs and expenses, but the Court may award less than this amount.

How Do I Get More Information? For more information, including a more detailed Notice, Claim Form, a copy of the Settlement Agreement and other documents, go to www.GrandeGamesSettlement.com, contact the settlement administrator at 1-877-540-0582 or Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111, or call Class Counsel at 1-646-837-7150.

EXHIBIT D

Case 2:20-cv-01310-RSM

COURT AUTHORIZED NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

If you played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, and/or other SpinX Social Casino Games, you may be part of a class action settlement.

A settlement has been reached in a class action lawsuit against SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd. ("Defendants"), alleging claims based on the sale of virtual chips in the following social casino-style games: Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush. Defendants deny all claims and that they violated the law, but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Document 78 Filed 11/21/22 Page 31 of 34

Grande Games Settlement c/o JND Legal Administration P.O. Box 91221 Seattle, WA 98111



Unique ID: XXXXXX

Postal Service: Please do not mark barcode

NAME ADDRESS CITY, STATE ZIP

By Order of the Court Dated: March 24, 2022

Case 2:20-cv-01310-RSM Document 78 Filed 11/21/22 Page 32 of 34
Our records indicate you may be a Settlement written objection must be filed no later than **November 7**, 2022. Specific

Am I a Class Member? Our records indicate you may be a Settlement Class Member. Settlement Class Members are persons who played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush, on or before January 31, 2022, while located in the state of Washington.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$3,500,000 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses as well as any attorneys' fees, costs, and incentive award to the Class Representative awarded by the Court. If you are entitled to relief, you may submit a claim to receive a share of the Settlement Fund. Your share will be depend on, among other things, (1) the total dollar amount of in-game purchases you made while playing the Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, and/or other SpinX Social Casino Games, with those who spent more money receiving a higher percentage back, (2) whether or not your claims are potentially subject to the Dispute Resolution and Arbitration Provision in Defendants' Terms of Service, and (3) how many Settlement Class Members submit claims. You can find more information, and estimate your share of the Settlement Fund, at www.GrandeGamesSettlement.com.

<u>How Do I Get a Payment?</u> To receive a payment, you must submit a timely and complete Claim Form by mail or online, submitted or postmarked **no later than January 26, 2023**. You can submit the claim form online at www.GrandeGamesSettlement.com. You may also request a paper claim form and mail it to Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the settlement administrator no later than November 7, 2022. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your

written objection must be filed no later than **November 7, 2022**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.GrandeGamesSettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims relating to the allegations in this case against Defendants and any other Released Parties will be released.

Who Represents Me? The Court has appointed lawyers from Bursor & Fisher, P.A. to represent the class. These attorneys are called "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Plaintiff Alma Sue Croft is a Settlement Class Member and the Court appointed her as "Class Representative."

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at 9:00 a.m. PST on December 1, 2022 in the United States District Court for the Western District of Washington, 700 Stewart Street, Seattle, WA 98101. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; determine the fairness of the settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representative \$5,000 from the Settlement Fund for his services in helping to bring and settle this case. Class Counsel will be paid from the Settlement Fund in an amount to be determined and awarded by the Court. Class Counsel will seek no more than 25% of the Settlement Fund in attorneys' fees, plus reimbursement of reasonable costs and expenses, but the Court may award less than this amount.

How Do I Get More Information? For more information, including a more detailed Notice, Claim Form, a copy of the Settlement Agreement and other documents, go to www.GrandeGamesSettlement.com, contact the settlement administrator at 1-877-540-0582 or Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111, or call Class Counsel at 1-646-837-7150.

EXHIBIT E

GRANDE GAMES SETTLEMENT CLAIM FORM

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **JANUARY 26, 2023**. THE CLAIM FORM MUST BE SIGNED AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

The Settlement Administrator will review your Claim Form. If accepted, you will receive a share of the Settlement Fund. This process takes time, please be patient. If you have any questions, or would like to estimate your share of the Settlement Fund, visit: www.GrandeGamesSettlement.com.

Instructions: Fill out each section of this form and sign where indicated. To find your Player ID(s), selecting the "**Settings**" menu and look for the "Player ID" at the bottom of the page.

First Name	Last Name		
First Name	L'ast Name		
Street Address			
City	State	ZIP Code	
Email Address		Phone Number	
Email Address			
Cash Frenzy Player ID(s) (only complete if you have played this game)	Lotsa Slots Player ID(s) (only complete if you have played this game)	Jackpot World Player ID(s) or Other SpinX Games Social Casino Game ID(s)	
(only complete if you have played this game)	(only complete if you have played this game)	(only complete if you have played these game(s)	
All email addresses associated with Cash Frenzy, Lotsa Slots, Jackpot World, and/or other SpinX Games Social Casino			
Games accounts.			
All email addresses associated with Facebook (App Center), Apple (App Store), Google (Play Store), and Amazon (Appstore),			
accounts from which you played Cash Frenzy, Lotsa Slots, Jackpot World, and/or other SpinX Games Social Casino Game.			
Settlement Class Member Affirmation:			
By submitting this Claim Form you affirm under penalty of perjury that, to the best of your knowledge, the Player			
ID(s) and email address(es) listed above are yours.			
Signature:	Da	ite:/	
Unique ID:			
Select Payment Method:			
Select ONE box for how you would like to receive payment and provide the requested information.			
Check	Venmo®	PayPal [®]	
Mailing Address:	Email Address:	Email Address:	