

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

LBP HOLDINGS LTD.

Plaintiff

and

**ALLIED NEVADA GOLD CORP., SCOTT A. CALDWELL, ROBERT M. BUCHAN,
CORMARK SECURITIES INC., and DUNDEE SECURITIES LIMITED.**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

PLAN OF NOTICE

1. The First Notice shall be disseminated as follows:
 - (a) Class Counsel shall publish the Short Form First Notice in English in at least ¼ page size in the business/legal section of the weekend edition of The National Post;
 - (b) Class Counsel shall publish the Short and Long Form First Notice in English at <https://morgantico.com/hycroft-mining-corporation/>; and
 - (c) the O&O Administrator shall post the Long-Form First Notice in English on the website at www.CanadianAlliedNevadaSecuritiesSettlement.ca; and
2. The Second Notice shall be disseminated as follows:
 - (a) Class Counsel shall publish the Short-Form Second Notice in English in at least ¼ page size in the business/legal section of the weekend edition of The National Post;
 - (b) Class Counsel shall disseminate the Short-Form Second Notice in English advising of the settlement approval, of the Claims Bar Deadline and how to file a Claim Form;
 - (c) Class Counsel shall post the Long-Form Second Notice in English on the website at <https://www.investorcomplexlaw.com/hycroft-mining-corporation/>; and
 - (d) the Administrator shall post the Long-Form Second Notice in English on the website at www.CanadianAlliedNevadaSecuritiesSettlement.ca.

3. Claimants must complete and submit Claim Forms electronically using the online claims portal on or before the Claims Bar Deadline.