

Read this notice carefully as it may affect your legal rights

## HYCROFT GOLD CORP. SECURITIES CLASS ACTION SETTLEMENT APPROVED

This Revised Short Form Notice is directed to all persons, excluding certain persons associated with the Defendants, who acquired common shares of Hycroft Mining Corporation (“Hycroft”) pursuant to the secondary public offering by way of a final short form prospectus dated May 9, 2013, during its distribution period ending May 17, 2013, and continued to hold those common shares on July 22, 2013 (“Class Members” and the “Class”).

### Short-Form Notice

Kim Spencer McPhee Barristers, P.C. today announces that the Ontario Superior Court of Justice (the “Court”) has approved a settlement among all of the parties to the class proceeding styled as *LBP Holdings Ltd. v. Allied Nevada Gold Corp, Scott A. Caldwell, Robert M. Buchan, Cormark Securities Inc., and Dundee Securities Limited*. brought under the Court under Court File No. CV-14-50851300-CP (the “Action”)

The substance of the litigation (i.e. that the Defendants made misrepresentations in a 2013 short-form prospectus (the “Prospectus”) released May 9, 2013 concerning a secondary public offering) has not been adjudicated by the Court. The Defendants deny the allegations.

The settlement of the Action, without an admission of liability on the part of the Defendant, was approved by The Honourable Justice Belobaba on July 30, 2021. This Revised Short Form Notice provides a summary of the settlement.

The Defendants in this Action will pay or cause to be paid USD \$4,375,000 (the “Settlement Amount”), in full and final settlement of all claims against it in the Action. The Settlement Amount, less the lawyers’ fees and disbursements, administrator’s expenses, and taxes (the “Net Settlement Amount”), **and 10% of the Net Settlement Amount to be paid to Class Proceedings Fund as a levy for its funding support in this matter, in accordance with the Class Proceedings Regulation, O. Reg. 771/92, s.10(3), made under the Law Society Act, RSO 1990, c. L.8** will be distributed to the Class in accordance with the court-approved Plan of Allocation.

The Settlement Agreement may be viewed at <https://www.investorcomplexlaw.com/hycroft-mining-corporation/> or at [www.canadianalliednevadasecuritiessettlement.ca](http://www.canadianalliednevadasecuritiessettlement.ca).

### HOW TO MAKE A CLAIM FOR COMPENSATION

#### **CLAIMS FOR COMPENSATION MUST BE RECEIVED BY December 15, 2022**

Each Class Member must submit a completed electronic Claim Form on or before April 8, 2022 in order to participate in the settlement. The Claim Form can be accessed or downloaded at <https://portal.canadianalliednevadasecuritiessettlement.ca> or obtained by calling the Administrator at 1-877-400-1211. If you do not submit a completed Claim Form by December 15, 2022, you will not receive any part of the Net Settlement Amount.

*The publication of the original Notice was authorized by the Ontario Superior Court of Justice. On December 24, 2021, the Court of Justice directed this Revised Short Form Notice to be sent to highlight that the Class Proceedings Fund earns a 10% levy as identified above. Questions about this Notice should NOT be directed to the Court.*

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The Claim Form should be submitted to the Administrator by using the secure online claims administration portal at <https://portal.canadianalliednevadasecuritiessettlement.ca/>. You may submit a paper Claim Form only if you do not have internet access. The paper Claim Form may be sent by mail to:



Administrator, Paul Battaglia,  
Trilogy Class Action Services,  
117 Queen Street, P.O. Box. 1000,  
Niagara-on-the-Lake, Ontario, L0S 1J0,  
Attention: Hycroft Class Action,  
Toll-Free Phone Number: 1-877-400-1211,  
Fax: 416-342-1761,  
Email: [claims@trilogyclassactions.ca](mailto:claims@trilogyclassactions.ca)

### **QUESTIONS:**

Questions for the Class Members' lawyers may be directed to:

Andrew Morganti  
**Kim Spencer McPhee Barristers, P.C.**  
1200 Bay Street, Suite 1203  
Toronto, ON,  
M5R 2A5  
Tel: (248) 787-6078  
Email: [amorganti@investorcomplexlaw.com](mailto:amorganti@investorcomplexlaw.com)

### **INTERPRETATION:**

If there is a conflict between the provisions of this Notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

**This Notice has not been approved by the Court.  
Questions about matters in this Notice should NOT be directed to the Court.**

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