

INSTRUCTIONS FOR COMPLETING YOUR PROOF OF CLAIM TO PARTICIPATE IN THE \$586 MILLION CLASS ACTION SETTLEMENT OF THE IPO SECURITIES LITIGATION

IMPORTANT: PLEASE READ THE ACCOMPANYING SETTLEMENT NOTICE AND THESE INSTRUCTIONS CAREFULLY.

GENERAL INSTRUCTIONS

- A. The accompanying Global Settlement Notice (“Settlement Notice”) contains important information about your rights, defines certain settlement terms and eligibility criteria, and describes the proposed settlement and the manner in which the \$586 million settlement will be distributed if the settlement is granted final approval by the Court. It is important that you read the Settlement Notice.
- B. If you are NOT a member of the Class (as defined in the Settlement Notice), or did not incur a “Recognized Claim” (as defined in the Plan of Allocation described in the Settlement Notice), DO NOT submit a Proof of Claim form.
- C. Before completing the enclosed Proof of Claim, it is important to read these instructions carefully. Failure to follow the instructions may result in either an inability for you to participate in the recovery, or a delay in your receipt of a recovery.
- D. To participate in the settlement, you MUST either: (1) file your claim on-line by visiting www.iposecuritieslitigation.com; or (2): (a) complete and sign the enclosed Proof of Claim; (b) attach copies of all required documentation; and (c) mail your Proof of Claim so that it is postmarked no later than December 10, 2009 to: Initial Public Offering Securities Litigation, c/o The Garden City Group, Inc., P.O. Box 9352, Dublin, OH 43017-4252.
- E. When completing your transactional information (Section C), the transaction date is the “trade” or “contract” date not the “settlement” or “payment” date.
- F. Use a separate page for each Entity’s Subject Security that you purchased during the Settlement Class Period for that Subject Security.
- G. If you need more than one page to list your transactions in ONE Entity’s Subject Security please photocopy the transaction page with the box at the bottom of the page and check the box (or all boxes) before the last page for that Entity.
- H. If you have transactions in more than three (3) Entities’ Subject Securities and you therefore need more pages than are provided to list your transactions, please photocopy additional transaction pages and include them with your Proof of Claim form.
- I. NOTICE REGARDING SUPPORTING DOCUMENTATION: All eligible transactions must be appropriately documented. Acceptable documentation generally includes periodic brokerage statements or trade confirmation slips. Documentation must include the claimant’s name and address and identify the security, trade date, price paid per share and total amount of transaction. Do NOT provide originals or copies of stock certificates as they are not acceptable documentation of the trade date or price. Please send legible photocopies of your periodic brokerage statements or trade confirmation slips. You should keep a copy of the Proof of Claim and all supporting documentation you submit.

QUESTIONS? CALL TOLL-FREE 1-800-916-6946 OR VISIT WWW.IPOSECURITIESLITIGATION.COM

- J. **NOTICE REGARDING ELECTRONIC FILES:** Claims with 100 or more transactions must be submitted electronically and in the required format. To obtain the mandatory electronic filing requirements and file layout, you may visit the website at www.iposecuritieslitigation.com or you may e-mail the Claims Administrator at eClaim@gardencitygroup.com. Any file not in accordance with the required electronic filing format will be subject to rejection. Proof of authority to submit a Proof of Claim on behalf of any managed accounts must be submitted. All Claimants MUST submit a manually signed paper Proof of Claim form, whether or not they also submit electronic copies. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.
- K. **NOTICE REGARDING MULTIPLE CLAIM FORMS:** Separate Proofs of Claim should be submitted for each separate legal entity (for example, a claim from Joint Owners should not include separate transactions of just one of the Joint Owners, an Individual should not combine his or her IRA transactions with transactions made solely in the Individual's name). Conversely, a single Proof of Claim should be submitted on behalf of one legal entity including all transactions made by that entity no matter how many separate accounts that entity has (for example, a corporation with multiple brokerage accounts should include all transactions made in all Subject Securities during the relevant Class Period(s) on one Proof of Claim, no matter how many accounts the transactions were made in.)

**INSTEAD OF COMPLETING THIS FORM, YOU MAY FILE YOUR CLAIM ON-LINE AT
WWW.IPOSECURITIESLITIGATION.COM**

Step-by-Step Instructions for Completing the Proof of Claim

COVER PAGE

- Step 1.** At the bottom of the first page of the Proof of Claim, locate the boxes appearing next to the words "Claim Number" and "Control Number."
- Step 2.** If you received a yellow "Frontispiece" locate your assigned Claim Number and Control Number from the yellow Frontispiece included in your claim packet. These numbers are located above your name and address. Please print these numbers clearly in the boxes provided on the first page of your Proof of Claim form. If you did not receive a Frontispiece or your Frontispiece is blank, leave the boxes empty, you will be assigned new numbers upon receipt by the Claims Administrator of your completed Claim Form.

SECTION A – CLAIMANT INFORMATION – PAGE 2.

****Everyone must complete this section. Failure to complete this section will result in the **rejection** of your claim.****

- Step 3.** State the name of the claimant(s). Names should be provided as you would like it to appear on the payment you receive, provided you are eligible to receive a payment.
- Step 4.** Provide your social security number or tax payer identification number in the boxes provided.

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Step 5. If you would like the Claims Administrator to contact an agent on your behalf if there are questions about your claim (e.g. an attorney, parent or guardian, trustee, custodian, financial advisor, etc.), please provide that information in the space provided. If you wish to be contacted yourself about your claim, leave this space blank.

Step 6. Please provide your street address. If you provided the name of an agent, provide your agent's address.

Step 7. Please provide your daytime and evening telephone numbers. If you provided the name of an agent, provide your agent's telephone number(s).

Step 8. Please provide your email address. If you provided the name of an agent, provide your agent's email address. An email address is not required, but if you provide it you authorize the Claims Administrator to use it in providing you with information relevant to your claim.

SECTION B – LIST OF ENTITIES AND SUBJECT SECURITIES – PAGES 3 - 4.

****Everyone must complete this section. Failure to complete this section will result in the **rejection** of your claim.****

Step 9. Review the list of 309 entities, and their corresponding ticker symbols shown next to their names, appearing on pages 3 and 4.

Step 10. Please circle **all** the entities for which you purchased Subject Securities during the relevant class period. You must provide transactional information in Section C of the Claim Form **and** supporting documentation for each entity that you circle.

SECTION C – SCHEDULE OF TRANSACTIONS IN SUBJECT SECURITIES– PAGES 5 -7.

NOTE: For each entity circled in Section B, you must complete a separate transaction page in Section C. **Do not list more than one entity on each page.** If additional pages are necessary, please photocopy the transaction pages in Section C and check the box at the bottom of page 7.

****Everyone must complete this section. Failure to complete this section for each circled entity may result in the **rejection** of your claim.****

Step 11. In the box provided at the top, identify the name of the Entity for which you are providing your transactional information. **Only provide transactional information for one Entity on each page.**

Step 12. List **all** purchases of that Entity's Subject Securities made between the relevant start date and December 6, 2000, inclusive, for this Entity. If all of your transactions in this Entity's Subject Security cannot fit in the spaces provided, please copy the sheet with the box at the bottom of the page and check the box (or all boxes) before the last page needed for that Entity.

Step 13. For each purchase transaction listed in Section C.1, **you MUST provide** the date of the purchase, the number of Subject Securities purchased, the purchase price per share and the total cost of the transaction (including commissions, taxes and fees).

- Step 14.** If you **sold** Subject Securities between the relevant start date and December 6, 2000, inclusive, **you must complete Section C.2.** List all sales made between the relevant start date and December 6, 2000, inclusive.
- Step 15.** For each sale transaction **you MUST provide** the date of the sale, the number of Subject Securities sold, the sale price per Subject Security and the total amount received (net of commissions, taxes and fees).
- Step 16.** **In Section C.3,** provide the amount of Subject Securities that you owned at the close of business on December 6, 2000. If you did not own any Subject Securities, put a zero (0) in the box.
- Step 17.** If you purchased Subject Securities of another entity, go back to Step 11 and start a new page. If you need additional pages, check the box at the bottom of page 7, and make photocopies of that page. Repeat Steps 11 through 17 for each circled entity in Section B, until all transactions are provided, then continue to Step 18.

SECTION D – REPRESENTATIONS, RELEASE AND SIGNATURE – PAGE 8.

****Everyone must complete this section. Failure to complete this section will result in the **rejection** of your claim****

- Step 18.** Read the release and certification carefully.
- Step 19.** Sign the form in the required area on Page 8. If you are signing on behalf of a Claimant in a representative capacity, please print your name and your title/capacity in the space provided (you must also provide proof of your authority to act for the Claimant). If the claim is being made by Joint Claimants, then each must sign.

COMPLETING YOUR CLAIM FORM

*****YOU ARE ALMOST DONE*****

If you have fully completed your claim form as discussed above, there are only two steps remaining:

- Step 20.** **SUPPLY APPROPRIATE SUPPORTING DOCUMENTATION.** Ensure that appropriate documentation is provided for all entities circled in Section B, and all transactions listed in Section C. Attaching such back-up documentation is not IN LIEU of completing your claim form – if the claim form is not completed as instructed above, your claim **WILL BE REJECTED**. Attach documentation for all transactions and holdings being claimed.
- Step 21.** **SUBMIT YOUR CLAIM FORM ON OR BEFORE DECEMBER 10, 2009. Once all of the above is completed, mail your** Proof of Claim and Release and all necessary back up documentation to the Claims Administrator so that it is **postmarked no later than December 10, 2009.** Keep a copy of your Proof of Claim and Release form and all back up documentation for your records.