

PROOF OF CLAIM AND RELEASE

Your claim must be submitted online or mailed and postmarked by: **April 13, 2020**

Coinbase Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Website: www.CoinbaseSettlement.com

COINBASE

BRANDON LEIDEL, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

COINBASE, INC., a Delaware corporation d/b/a, Global Digital Asset Exchange (GDAX),

Defendant.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 9:16-cv-81992-MARRA

I. WHETHER AND HOW TO SUBMIT A CLAIM – READ PARAGRAPHS 1 – 3 TO DETERMINE WHICH PARAGRAPH APPLIES TO YOU

IF YOU DID NOT MAKE A CLAIM IN THE CRYPTSY SETTLEMENT FROM THE CLASS ACTION STYLED *Leidel, et al. v. Project Investors, Inc. d/b/a CRYPTSY, Paul Vernon, and Lorie Ann Nettles*, U.S. District Court - Southern District of Florida, Case No. 9:16-cv-80060-MARRA (the “Cryptsy Case”)

1. To recover as a Member of the Class based on your claims in this action, which is entitled *Leidel et al. v. Coinbase, Inc.*, U.S. District Court - Southern District of Florida, Case No. 9:16-cv-81992-MARRA (the “Coinbase Litigation”), you must complete and, on page __ hereof, sign this Proof of Claim and Release form, and include the required supporting documents. If you fail to submit a timely and properly addressed (as set forth in paragraph 5 below) Proof of Claim and Release form, your claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed settlement. Submission of this Proof of Claim and Release form, however, does not assure that you will share in the proceeds of the settlement of the Coinbase Litigation. The settlement is subject to court approval, and your claim will be reviewed to determine if it satisfies the requirements of the settlement.

IF YOUR CLAIM IN THE CRYPTSY CASE WAS REJECTED

2. To recover as a Member of the Class based on your claims in this action, which is entitled *Leidel et al. v. Coinbase, Inc.*, U.S. District Court - Southern District of Florida, Case No. 9:16-cv-81992-MARRA (the “Coinbase Litigation”), you must complete and, on page __ hereof, sign this Proof of Claim and Release form, and include all supporting documents that you did not submit in the Cryptsy Case. If you do not submit any additional, new supporting documents, your claim will be rejected. If you fail to submit a timely and properly addressed (as set forth in paragraph 5 below) Proof of Claim and Release form, your claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed settlement. Submission of this Proof of Claim and Release form, however, does not assure that you will share in the proceeds of the settlement of the Coinbase Litigation. The settlement is subject to court approval, and your claim will be reviewed to determine if it satisfies the requirements of the settlement.

IF YOUR CLAIM IN THE CRYPTSY CASE WAS APPROVED AND PAID

3. To recover as a Member of the Class based on your claims in this action entitled *Leidel et al. v. Coinbase, Inc.*, U.S. District Court - Southern District of Florida, Case No. 9:16-cv-81992-MARRA (the “Coinbase Litigation”), you need not take any action. You do not have to submit a Claim Form in order to receive a payment in this settlement. The approved claim that you submitted in the Cryptsy Case will be deemed approved in this case, and you will receive a settlement payment in this Coinbase Litigation, provided that the Court approves the settlement.

5. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM AND RELEASE FORM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, NO LATER THAN APRIL 13, 2020, ADDRESSED AS FOLLOWS:

Coinbase Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

If you are NOT a Member of the Class (as defined in the Notice of Proposed Settlement of Class Action (“Notice”), or if you submitted an approved and paid claim in the Cryptsy Case, DO NOT submit a Proof of Claim and Release form.

6. If you are a Member of the Class and you did not timely request exclusion in response to the Notice of Proposed Settlement dated January 13, 2020, you are bound by the terms of any judgment entered in the Coinbase Litigation, including the releases provided therein, **WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM AND RELEASE FORM.**

II. CLAIMANT IDENTIFICATION

You may submit a Claim if you are a member of the Class. You are a member of the Class if at any time between November 1, 2015 and the present, you were a Cryptsy account holder, and held at Cryptsy Bitcoins, alternative cryptocurrencies, or any other form of monies or currency that you are unable to access, trade or otherwise obtain. (You are not a Class Member, and cannot make a claim, if you are or were an employee of Cryptsy or of Coinbase, including their shareholders, officers and directors and members of their immediate families, or if you opened an account at Cryptsy after the date that Coinbase closed the Coinbase accounts of Cryptsy and Paul Vernon, which was October 4, 2015.)

Use Part A of this form entitled “Claimant Identification” to identify yourself.

You must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

III. CLAIM FORM

Use Part B of this form entitled “Schedule of Holdings” to supply all required details of your holdings at Cryptsy between November 1, 2015 and the present. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to all of your holdings. You must also provide proof of your holdings, such as an account statement, screen shots, trade verifications or other documents that establish that you held such cryptocurrency at Cryptsy between November 1, 2015 and the present. Failure to report all such transactions may result in the rejection of your claim.

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All claimants **MUST** submit a manually signed paper Proof of Claim and Release form whether or not they also submit electronic copies. If you wish to file your claim electronically, you must contact the Claims Administrator at 1-888-868-4936 to obtain the required file layout. 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.

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SECTION A: NAME AND CONTACT INFORMATION

First Name	Last Name
Email Address	Phone Number

U.S. RESIDENT

STREET ADDRESS (MAILING ADDRESS)		
CITY	STATE	ZIP

FOREIGN RESIDENT

STREET ADDRESS (MAILING ADDRESS)		COUNTRY
CITY	PROVINCE	POSTAL CODE

SECTION B: SCHEDULE OF HOLDINGS AT CRYPTSY

TYPE OF CRYPTOCURRENCY	DATE PURCHASED/ QUANTITY PURCHASED	QUANTITY HELD BETWEEN 11/1/2015 AND THE PRESENT DATE

Please identify any redemptions, returns, transfers or any other return or recovery of money or cryptocurrencies that you have already received associated with your holdings at Cryptsy held between November 1, 2015 and the present. Such would include, but not be limited to, recoveries from claims and/or lawsuits that you threatened or filed, or any other source. For each return/recovery of money or cryptocurrencies, provide the date you received same, from whom you received same, and the amount of money or cryptocurrencies recovered/returned.

Date	Amount	From Whom Did You Receive

IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Proof of Claim and Release under the terms of the Settlement Agreement described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Southern District of Florida, with respect to my (our) claim as a Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Coinbase Litigation. I (We) agree to furnish additional information to the Claims

Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same Cryptsy holdings and know of no other person having done so on my (our) behalf.

V. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, completely, and forever settle, release, and discharge all Released Claims against the "Released Party," which means Defendant Coinbase and its past, present, and future parents, predecessors, successors, partners, assigns, joint venturers, subsidiaries, affiliates, divisions, and each and all of their respective owners, investors, shareholders, officers, directors, vendors, employees, attorneys, insurers, and agents (alleged or actual), but **expressly excludes** Paul Vernon and the Cryptsy Defendants (including without limitation natural persons, firms, corporations, officers, directors, shareholders, limited liability companies, members, managers, joint ventures, joint stock companies, unincorporated organizations, agencies, bodies, associations, partnerships, limited liability partnerships, partners, and their predecessors, successors, administrators, executors, heirs and assigns).

2. "Released Claims" means any individual, class, representative, group or collective claim, liability, right, demand, suit, matter, obligation, damage, loss, action or cause of action, of every kind and description, that a Releasing Party has or may have, including assigned claims, whether known or unknown, suspected or unsuspected, asserted or unasserted, latent or patent, contingent or noncontingent, that is, has been, could have been or in the future might be asserted by the Releasing Party either in the Court or any other court or forum, regardless of legal theory, regardless of the source of law (federal, state, local, or international, and whether based upon common law or a statute or ordinance) and regardless of the type of relief or amount of damages claimed, against any of the Released Parties, arising from or related to the allegations in the Coinbase Litigation occurring, the conduct of the Cryptsy Defendants, or the accounts on the Coinbase platform that were owned or controlled, in whole or in part, by any of the Cryptsy Defendants, and occurring prior to the Effective Date. The Released Claims include, but are not limited to, claims that any Released Party (a) aided and abetted any unlawful conduct of the Cryptsy Defendants; (b) conspired with the Cryptsy Defendants; (c) violated any duty under any source of law or otherwise was negligent in relation to the accounts on the Coinbase platform that were owned or controlled, in whole or in part, by any of the Cryptsy Defendants; or (d) was unjustly enriched in connection with the accounts on the Coinbase platform that were owned or controlled, in whole or in part, by any of the Cryptsy Defendants.

3. This release shall be of no force or effect unless and until the Court approves the Settlement Agreement and the Settlement Agreement becomes effective on the Effective Date (as defined in the Settlement Agreement).

4. I/We hereby warrant and represent that I/we have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

A. I/We hereby warrant and represent that I (we) have included the information requested about all of Cryptsy holdings which are the subject of this claim.

B. I declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied on this Proof of Claim and Release form by the undersigned is true and correct.

Executed this _____ day of _____, 2020 in _____
(day) (month) (city, state/province/zip)

(Sign your name here)

(Sign your name here)

(Type your name here)

(Type your name here)

Capacity of Person Signing
(e.g., Beneficial Purchaser, Executor or Administrator)