

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

**NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION,
FAIRNESS HEARING, AND RIGHT TO APPEAR**

If you were a CRYPTSY account holder and are unable to access your CRYPTOCURRENCY, you could get money from this class action settlement against Coinbase, Inc.

Please read this notice carefully.

A federal court authorized this notice. This is not a solicitation from a lawyer.

Overview

This Notice describes a settlement of a class action lawsuit against Coinbase, and how you can get money from the settlement or exclude yourself from the settlement. Your legal rights are affected whether you act or don't act. Read this notice carefully.

Background

- On December 13, 2016, a class action lawsuit was filed against Defendant Coinbase, Inc., in the United States District Court for the Southern District of Florida styled *Leidel, et al. v. Coinbase, Inc. d/b/a Global Digital Asset Exchange (GDAX)*, Case No. 9:16-cv-81992-MARRA (the "Coinbase Case"). The Honorable Kenneth A. Marra is the presiding judge. Judge Marra also presided over the previously filed and related class action against Project Investors, Inc. d/b/a Cryptsy ("Cryptsy") styled *Leidel, et al. v. Project Investors, Inc. d/b/a CRYPTSY, Paul Vernon, and Lorie Ann Nettles*, Case No. 9:16-cv-80060-MARRA (the "Cryptsy Case").
- The Cryptsy Case was based on the unlawful conduct of Cryptsy and its founder, Paul Vernon ("Vernon"), including their theft of the cryptocurrencies of the Cryptsy account holders. Mr. Vernon closed Cryptsy, moved to China, refused to participate in the Cryptsy Case or return the cryptocurrency that he stole from Cryptsy account holders, and is not known to have returned to the United States. A Class Action Settlement was obtained in the Cryptsy Case, which was approved by Judge Marra. You can read about the completed Cryptsy Settlement at www.cryptsysettlement.com.
- This Notice is about the Coinbase Case, which was brought on behalf of Cryptsy account holders in an effort to recover additional monies for them. The Coinbase Case is based on allegations that Cryptsy and Mr. Vernon stole the cryptocurrencies of Cryptsy account holders and that Defendant Coinbase unlawfully aided and abetted Cryptsy and Vernon in their theft by allowing them to have accounts on the Coinbase platform that they used, among things, to convert bitcoin to U.S. dollars.
- After almost three years of litigation, which included (but was not limited to) an appeal to the United States Court of Appeals for the Eleventh Circuit, 16 depositions of, among others, present and former employees of Coinbase and Cryptsy, motions to compel, expert witness discovery, and the briefing of motions for summary judgment and class certification, the parties reached a class action settlement of the Coinbase Case with the assistance in mediation of Judge (Retired) Howard A. Tescher.

The purpose of this notice is to advise you of your rights with respect to the Coinbase Case settlement.

- If you are a Class Member and you submitted an approved claim in the class action settlement in the Cryptsy Case (*i.e.*, you received a settlement payment in the Cryptsy Case), you do not have to take any action to submit a claim in this Coinbase Case. Your approved claim from the Cryptsy Case will be reviewed in this Coinbase Case, and you will receive a settlement payment in this Class Action Settlement, provided that the Court approves the settlement, as explained below.
- If you did not submit a claim in the Cryptsy Case, or if your claim in the Cryptsy Case was rejected, you may submit a claim in the Coinbase Case. If you submitted a claim in the Cryptsy Case and your claim was rejected, you must submit a claim form in this Coinbase Case but you need not resubmit any of the supporting materials you submitted with your Cryptsy Claim; you need only submit in this Coinbase Case any additional documents and materials to support your claim.
- This is not a lawsuit against you. Your participation in this lawsuit or acceptance of money from the settlement will not affect your employment status or compensation in any way.
- Please read this Notice carefully. This Notice explains your legal rights and options—and the deadlines to exercise them. Your legal rights will be affected whether you act or don't act, and you have choices to make now.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	<p>If you did not make a claim in the Cryptsy case, or if you made a claim in the Cryptsy Case that was rejected, and you do nothing in this Coinbase Settlement, you will not get a payment from this settlement. You give up your rights to ever recover from Coinbase for the legal claims in this case if the settlement is approved.</p> <p>If you made a claim in the Cryptsy Case that was approved and paid, you do not have to take any action. Your Cryptsy claim will be deemed approved and will be paid if this settlement is approved.</p>
EXCLUDE YOURSELF FROM THE SETTLEMENT	<p>Get no payment from the settlement. This is the only way that you can file your own lawsuit or ever be part of any other lawsuit about the legal claims in this case against Coinbase.</p>
SUBMIT A CLAIM FORM FOR YOUR SHARE OF THE SETTLEMENT	<p>If you did not submit a claim in the Cryptsy Case or if your claim in the Cryptsy Case was rejected, the only way to receive money from the settlement when the funds are distributed is by submitting a claim form in this Coinbase Case by April 13, 2020.</p>
OBJECT TO OR COMMENT ON THE SETTLEMENT	<p>Following the instructions in Question 23 below, write to the Court about why you like or do not like the settlement by no later than March 13, 2020. You may also ask to speak to the Court about your written comments or objections about the fairness of the settlement at the “Fairness Hearing” on April 17, 2020, though you do not have to do so. To comment on or object to the settlement and request to speak at the “Fairness Hearing,” you must act before March 13, 2020.</p>
GO TO THE COURT’S FAIRNESS HEARING ABOUT THE SETTLEMENT	<p>If you would like, you may ask to speak in Court about the fairness of the settlement if you follow the instructions in Question 23 of this Notice. You do not need to speak to the Court to receive benefits under the settlement.</p>

The above bullet points and charts provide summary information regarding the lawsuit against Coinbase. The remainder of this Notice is designed to provide more information to help you evaluate your options and answer any questions that you may have.

The Court in charge of this case still has to approve the settlement. Payments will be made if the Court approves the settlement and orders that the settlement funds be distributed, and if any appeals of the Court’s approval of the settlement are resolved in favor of the settlement. Please be patient.

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BASIC INFORMATION

1. Why did I get this Notice?

You received this Notice because records recovered from Cryptsy indicate you may have had a Cryptsy Account, you requested a copy of the Notice through a toll-free number or contacted the lawyers involved in this case or the Claims Administrator.

The Court directed the parties to send you this Notice because Class Members have the right to know about the settlement of this class action lawsuit, and about their legal rights and options, before the Court holds a “Fairness Hearing” to decide whether to grant final approval of the settlement.

This Notice explains the lawsuit, the settlement, and your legal rights. It also explains what benefits from the settlement will be available, when they will be available, who is eligible for them, and how to obtain them. If the Court approves the settlement and orders that the settlement funds be distributed and if any appeals of the Court’s approval of the settlement is resolved in favor of the settlement, an administrator appointed by the Court will make the payments that the settlement allows.

The Court has preliminarily approved the settlement. If you are a Class Member, you have legal rights and options that you may exercise before the Court considers whether it will grant final approval to the proposed settlement at the “Fairness Hearing.” The Court will hold the Fairness Hearing on **April 17, 2020**, to decide whether the proposed settlement is fair, reasonable, and provides adequate compensation and benefits to the members of the Class.

If you wish to comment on (including object to) or exclude yourself from the settlement, you must do so by following the procedures described below. If you do nothing, you will not receive any money from the settlement, but you will be bound by any final judgment.

2. What is this lawsuit about?

On December 13, 2016, Plaintiff filed this class action against Coinbase on behalf of himself and on behalf of account holders in a cryptocurrency exchange known as “Cryptsy”. Cryptsy operated an online business for customers to exchange, invest, and trade in digital cryptocurrencies, such as “Bitcoin” and “Litecoin.” Cryptsy customers, including Plaintiff and the Class, deposited their digital currency in accounts held at, and purportedly protected and managed by, Cryptsy. In the Cryptsy Case, Plaintiffs alleged that Cryptsy and its founder, Paul Vernon, acted unlawfully by denying the Class the ability to withdraw or use the funds in their accounts and by stealing for their own use and benefit the digital currency held in the Cryptsy customer accounts. A settlement was reached in the Cryptsy Case, which was approved by the same Court presiding over this Coinbase Case.

The Coinbase Case alleges that Coinbase unlawfully aided and abetted the conduct of Cryptsy and Vernon by allowing them to have accounts on the Coinbase platform or that Coinbase was negligent by, for example, failing to employ proper due diligence and other supervisory procedures over the accounts that Cryptsy and Vernon controlled on the Coinbase platform. The Coinbase Case also alleges that Cryptsy and Vernon used their accounts on the Coinbase platform to convert to U.S. Dollars the cryptocurrency that Cryptsy and Vernon allegedly stole from the Cryptsy account holders who are the Class Members in this lawsuit. Plaintiff alleged that Coinbase knew or should have known that Cryptsy and Vernon were engaged in such unlawful conduct, and assisted Cryptsy and Vernon by allowing them to open and maintain accounts on the Coinbase platform.

Coinbase denied these allegations, and contended that it did not know about any of the alleged theft, did not have any reason to know of the alleged theft, and did not have any legal responsibility for the alleged actions of Cryptsy and Vernon.

To obtain more information about the claims and defenses in this lawsuit, you can view the complaint, the answer, and other court documents in this case at www.coinbasesettlement.com.

3. Why is this a class action, and who is involved?

In a class action, one or more people called “class representatives” sue on behalf of themselves and other people who have similar claims. The people with similar claims are a “Class” and are called “Class Members.” Named Plaintiff Brandon Leidel, who had a Cryptsy account, is the Class Representative in this case. The Class Members include other Cryptsy account holders, as described more fully in this notice. Plaintiff and Defendant Coinbase have agreed to settle this class action, and agreed for purposes of settlement that the case should proceed as a class action, subject to the Court’s approval.

4. Why is there a settlement?

The Court has not found in favor of Plaintiff or Defendant. While the lawsuit is still pending before the United States District Court, Plaintiff and Coinbase have agreed to a settlement which, if it is approved, will bring the claims against Coinbase to an end. That way, Plaintiff and Coinbase avoid the uncertainty of continuing the case between them and the cost of further litigation, and Class Members will get the benefits of the settlement. The Class Representative and his attorneys think the settlement is best for everyone who allegedly was harmed by Coinbase’s alleged conduct, given the payment to be made available to Class members and the uncertainty of how the claims and defenses would be resolved in the event that the litigation continued.

5. What if I made a claim in the Cryptsy Case and received a Settlement Payment?

If (a) you made a claim in the Cryptsy Case, (b) your claim was approved, and (c) you received a settlement payment, you need not take any action to submit a claim in this Coinbase Settlement. Your claim from the Cryptsy Settlement will be deemed approved and paid in this Coinbase Case, provided that the Court approves the settlement.

6. What if I made a claim in the Cryptsy Case and did not receive a Settlement Payment?

If: (a) you made a claim in the Cryptsy Case, (b) your claim was not approved, and (c) you did not receive a settlement payment, you must submit a claim to receive any payment from this Coinbase Case. To submit a claim in this Coinbase Case, you must properly and timely submit the Claim Form. You need not include with your Claim Form any supporting materials that you submitted with your Claim Form in the Cryptsy Case, but to receive a payment in this Coinbase Case you must submit additional materials to satisfy the requirements for the submission of a valid claim. If you do not submit any additional supporting materials, your claim in this Coinbase Case will not be approved.

7. What if I did not make a claim in the Cryptsy Case?

You must submit a claim in this Coinbase Case to receive any payment from this Coinbase Case if you did not submit a claim in the Cryptsy Case. You should fully complete and timely submit a Claim Form in this Coinbase Case and include with your Claim Form all required supporting materials.

WHO IS IN THE SETTLEMENT AND THE CLASS ACTION LAWSUIT?

8. Am I a Class Member who is part of the settlement?

In general, individuals who are Cryptsy account owners who held Bitcoin, alternative cryptocurrencies, or any other form of monies or currency at Cryptsy as of November 1, 2015, and are unable to access their cryptocurrency may be Class Members who are eligible for a payment from the settlement when the funds are distributed. Excluded from the Class are all employees of Cryptsy, including its shareholders, officers and directors and members of their immediate families, as well as any person or entity that opened an account at Cryptsy after the date that Coinbase closed the accounts of Cryptsy and Paul Vernon on the Coinbase platform, which are known as the Cryptsy, Vernon and Mintsy accounts, which was October 4, 2015. Also excluded from the Class are all employees of Coinbase, including its shareholders, officers and directors and members of their immediate families.

9. I'm still not sure if I am included.

If you received this Notice, you contacted Class Counsel and provided information that indicates that you may be a potential Class Member, or your contact information was discovered in records of Cryptsy dated as of January 1, 2014. If you are still not sure whether you are included, you can get help at www.coinbasesettlement.com or by calling (833) 277-8323.

10. Is the Receiver from the Cryptsy Case involved in this settlement?

A Receiver is a person appointed by the Court to typically preserve the assets and property of a company in financial distress or subject to claims of wrongdoing. In the Cryptsy case, the Court appointed a Receiver at the request of Plaintiffs and their lawyers (known as Class Counsel, as described below). Plaintiffs filed a motion in the Cryptsy Case to ask the Court to appoint a Receiver because Plaintiffs wanted to ensure that Cryptsy, Paul Vernon and others did not attempt to hide, sell or otherwise keep from Plaintiffs and the Class monies and assets to satisfy any judgment obtained in that case, and likewise to recover monies and assets for the benefit of the Class. The Receiver is not a party in the Coinbase Case but he agrees that this settlement is in the best interest of the Class and he is, as part of the settlement, releasing claims of the Receivership Estate against Coinbase.

11. What are my rights as a Class Member?

If you submitted a claim in the Cryptsy Case that was approved and paid, you have the right to (1) do nothing, in which case your Cryptsy Claim will be deemed approved, processed and paid in this Coinbase Case provided that the Court approves the settlement, (2) submit any additional materials that you believe show that you had more cryptocurrency in your Cryptsy Account than you submitted with your Cryptsy Claim, (3) exclude yourself from the settlement (*see* Question 20), (4) comment on or object to the settlement (*see* Question 23), and/or (5) attend the Court's Fairness Hearing to speak in support of or against the Court's final approval of the settlement (*see* Question 27).

If you submitted a claim in the Cryptsy Case that was rejected or if you did not submit a claim in the Cryptsy Case, you have the right to (1) do nothing, in which case you will not receive a payment and will waive any rights to pursue a lawsuit of your own against Coinbase and the other parties released in the settlement, (2) submit a Claim Form to receive a payment from the Settlement Funds (*see* Question 14), (3) exclude yourself from the settlement (*see* Question 20), (4) comment on or object to the settlement

(see Question 23), and/or (5) attend the Court's Fairness Hearing to speak in support of or against the Court's final approval of the settlement (see Question 27).

THE SETTLEMENT BENEFITS

Plaintiff, the Class and Coinbase entered a Settlement Agreement. The Settlement Agreement is available for your review at www.coinbasesettlement.com. You can also review the Settlement Agreement by visiting www.pacer.gov, or by contacting the Clerk of Court. The following pages provide a summary of the Settlement Agreement, and your rights and options under the Settlement Agreement.

12. What does the settlement provide?

Coinbase has agreed to create a Settlement Fund of \$962,500. After deducting attorneys' fees, costs, applicable taxes, and other monies, fees and expenses (see Question 19), the Settlement Fund will be distributed to Class Members who file valid claims.

As a Settlement Class Member, you will give up, or "release," your claims against Coinbase. The release includes any claims made or that could have been made arising from or related to the facts alleged in this lawsuit. The releases are described in more detail in the Settlement Agreement and in Question 16 below.

13. How much money can I get from the settlement?

Class Members who submitted a valid claim in the Cryptsy Case or who submit a valid Claim Form in this Coinbase Case are called "claimants" and will be eligible to receive a share of the Settlement Fund if and when the Settlement Fund is distributed. The Claims Administrator, with the assistance of Class Counsel, determined in the Cryptsy Case the market value, as of November 1, 2015, of the cryptocurrency(ies) held by Class Members that submitted valid claims. The same valuation and plan of allocation approved by the Court in the Cryptsy Case will be used in this Coinbase Case. Each Class Member submitting a valid claim shall be allocated a pro rata share of the Net Settlement Fund based on his, her or its claim compared to the total number of valid claims, but in no event will any Class Member receive more than 100 percent of the Class Member's unreimbursed losses or damages from the Net Settlement Fund. There is no way to determine, in advance, how many Class Members will make claims from the Net Settlement Fund. Class Members who do not submit valid claims will not share in the proceeds of the Net Settlement Funds, but will nevertheless be bound by this Settlement.

The proposed Plan of Allocation is contained in the Settlement Agreement which is available for review at www.coinbasesettlement.com, and will be presented for approval by the Court at the Fairness Hearing (see Question 25).

SUBMITTING A CLAIM FORM FOR A SHARE OF THE SETTLEMENT

14(A). How can I get money from the settlement? (For Class Members who submitted approved and paid claims in the Cryptsy Case).

If (a) you made a claim in the Cryptsy Case, (b) your claim was approved, and (c) you received a settlement payment, you need not take any action to submit a claim and get money in this Coinbase Case. Your claim from the Cryptsy Case will be deemed approved and paid in this Coinbase Case, provided that the Court approves the settlement. If you wish to submit additional materials that show that you had more cryptocurrency at Cryptsy than you submitted with your Cryptsy Claim, you may do so by submitting a new Claim Form and the new supporting materials.

14(B). How can I get money from the settlement? (For any Class Member who submitted a claim in the Cryptsy Case that was rejected or who did not submit a claim in the Cryptsy Case).

IF YOUR CLAIM IN THE CRYPTSY CASE WAS REJECTED, OR IF YOU DID NOT MAKE A CLAIM IN THE CRYPTSY CASE, YOU MUST DO THE FOLLOWING TO GET MONEY FROM THIS SETTLEMENT.

If you fall within the Class definition, you may receive money from the settlement.

To receive money from the settlement, you must complete and submit a Claim Form, either online at www.coinbasesettlement.com, or by mail. A copy of the Claim Form is included with this Notice. Please read this Notice and the Claim Form carefully. You must either complete and submit the form online no later than **April 13, 2020**, or **complete the included form manually, sign it, and mail it postmarked no later than April 13, 2020, to the Claims Administrator at the address listed in the Claim Form.** If necessary, you may download and print out a Claim Form from the website www.coinbasesettlement.com.

Please note that the Claim Form must be signed. By signing your Claim Form, you will be swearing that the information you submit is true and accurate. You will also be authorizing the Claims Administrator to contact you for more information to help evaluate your Claim.

IF YOU DO NOT SUBMIT YOUR SIGNED CLAIM FORM WITH THE REQUIRED SUPPORTING DOCUMENTS BY THIS DEADLINE, YOU WILL BE DEEMED TO HAVE WAIVED YOUR RIGHT TO RECEIVE ANY PAYMENT FROM THE SETTLEMENT FUND.

As part of your Claim, you should provide as much documentation as you can supporting your claim, including your status as a Cryptsy account holder and specifically the type and amount of cryptocurrency you held at Cryptsy as of November 1, 2015 and which you can no longer access. All information provided will be treated as confidential and will be used only for the purpose of reviewing and administering your Claim.

Examples of documentation you might have to support your claim include screen shots of your holdings at Cryptsy or account statements. You may have other types of supporting documentation. You should submit whatever you have. Please note that it appears that Paul Vernon or someone under his direction destroyed all of Cryptsy’s database records and, as a result, the only way to establish your claim is through your submission of records that evidence your ownership of cryptocurrency held at Cryptsy as of November 1, 2015. Class Counsel asked Vernon to provide copies of the records that show all of the holdings of the Class, and likewise continue to search for such records. To date, Vernon has failed to respond to or comply with such requests.

If there is a balance remaining in the Settlement Fund 180 days after the last check is issued to pay all valid Claims, the Claims Administrator will, if feasible, distribute any remaining balance by way of *pro rata* payments to Class Members who submitted valid Claims and who cashed their checks, but in no event will any Class Member receive more than 100 percent of the Class Member’s unreimbursed losses or damages from the Net Settlement Fund. Thereafter, any remaining balance, if any, will revert and be paid to Coinbase.

If you have any problems with the Claim Form or questions about how to submit your claim, please call the Claims Administrator at the telephone number printed at the end of this Notice.

15. When will I get my payment?

The Court will hold a final Fairness Hearing on **April 17, 2020** to decide whether to approve the settlement. If the Court approves the settlement, there still may be appeals of that decision. If an appeal is filed, it is hard to estimate how long it might take for it to be resolved, but it can take a lot of time, perhaps more than a year. Settlement payments to Settlement Class Members will be distributed if the settlement is approved, and after appeals, if any, are resolved.

Updates regarding the settlement and when payments may be made will be posted on the settlement website, www.coinbasesettlement.com.

16. What am I giving up to get a payment under the settlement?

If you are a Class Member, unless you exclude yourself from the settlement, you are staying in the Class, and that means that you can’t sue, continue to sue, or be part of any other lawsuit against Coinbase about the legal claims in this case. It also means that all of the Court’s orders will apply to you and legally bind you, and that you agree to the “Releases of Claims” contained in the Settlement Agreement, which describe exactly the legal claims that you give up if you get settlement benefits.

You may view the release in the Settlement Agreement at www.coinbasesettlement.com.

By participating in this settlement, you are not giving up your right to receive payments from any future settlements, monies obtained from, and/or or a trial against, Cryptsy’s founder Paul Vernon, or any other person or entity, with the exception of Coinbase and the other persons and entities covered by the release in the Settlement Agreement.

THE LAWYERS REPRESENTING YOU

17. Who represents me in this case?

The Court appointed the law firms of Wites Law Firm and Silver Miller to represent you and other Class Members. Their contact information is as follows:

Marc A. Wites WITES LAW FIRM 4400 N. Federal Highway Lighthouse Point, Florida 33064 Phone: (954) 933-4400 mwites@witeslaw.com	David C. Silver SILVER MILLER 11780 W. Sample Road Coral Springs, Florida 33065 Phone: (954) 516-6000 dsilver@silvermillerlaw.com
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These lawyers are called Co-Lead Counsel and Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense and enter an appearance through your own counsel.

18. Should I get my own lawyer?

You do not need to hire your own lawyer because Plaintiff's Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Plaintiff's Counsel to speak for you. You may also appear for yourself without a lawyer.

19. How will the lawyers be paid?

The Settlement Agreement authorizes Co-Lead Counsel to seek an award of attorney's fees of up to 33.33% of the Settlement Fund, plus expenses and costs, which also will be paid from the Settlement Fund.

In addition, Co-Lead Counsel will ask the Court to award Plaintiff Brandon Leidel in this Action a service award of \$2,500 for his time and effort in acting as the Class Representative. Mr. Leidel participated in this case in many ways, such as reviewing and approving documents filed in the case, responding to discovery requests, producing documents, submitting himself to a full-day deposition, and attending mediation. The Service Award shall be paid when the Settlement Funds are distributed to Class Members who have submitted valid claims.

You will not be billed or charged for any of Class Counsel's fees, costs, or expenses. If the Court grants Counsel's requests, all fees, costs, and expenses will be deducted from any money obtained for the Class.

EXCLUDING YOURSELF FROM THE SETTLEMENT

20. How do I get out of the settlement?

If you fall within the Class definition but don't want a payment from the settlement or you want to keep the right to sue or continue to sue Coinbase (at your own expense) about the legal issues in this case, then you must "opt out" of the settlement. This is called excluding yourself from, or opting out of, a settlement Class.

To exclude yourself from (opt out of) the settlement, you must send a letter stating that you want to be excluded from the Coinbase Case, Case No.: 9:16-cv-81992. Be sure to include your name, address, telephone number, and your signature. **You must mail your exclusion request postmarked no later than March 13, 2020 to:**

Coinbase Settlement
ATTN: Exclusion Request
PO BOX 58220
Philadelphia, PA 19102

You cannot exclude yourself on the phone or by fax or e-mail – you must do so in writing. If you request to be excluded, you will not receive any money from the Settlement, and you cannot object to the Settlement. However, you will not be legally bound by anything that happens in this lawsuit, and you will keep your right to separately pursue claims against Defendant Coinbase relating to the subject matter of this lawsuit.

If you ask to be excluded from the settlement, you will not get any payment from the settlement, and you cannot object to that settlement.

21. If I don't exclude myself, can I sue Defendant Coinbase for the same thing later?

No. If you are a Class member, unless you exclude yourself from the settlement, you give up the right to sue Coinbase for the claims that the settlement resolves as more fully described in Question 16 above.

If you have a pending lawsuit against Coinbase, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself to continue your own lawsuit. The process for excluding yourself from the settlement and/or the ongoing lawsuit is described in the preceding sections.

22. If I exclude myself, can I get money from this case?

No. If you exclude yourself from the settlement, you will not receive money under the settlement even if you submit a Claim Form. But, by excluding yourself, you keep any rights to sue on your own about the same legal claims in the lawsuit should you want to do so.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

23. How do I tell the Court that I like or don't like a proposed settlement, and may I speak at the hearing?

If you are a Class Member, you can object to the Settlement if you do not like any part of the settlement including the proposed award of attorneys' fees and expenses, and the proposed service award to Plaintiff, and the Court will consider your views. To object, you must send a letter to the Court, Class Counsel, and Defendants' Counsel saying that you object to the Settlement in the Coinbase Litigation, Case No.: 9:16-cv-81922. Be sure to include your name, address, telephone number, your signature, and the reasons you object to the Settlement. You also must affirm under penalty of perjury that you are a Class Member and provide proof of Class Membership. If you are represented by counsel, be sure to include the name, address, and telephone number of that lawyer.

Your objection **must be mailed to and actually received** at all of the following different **locations no later than March 13, 2020**. Send your objection to:

Clerk of Court:	Class Counsel:	Defendant's Counsel:
Paul G. Rogers Federal Building and U.S. Courthouse 701 Clematis Street, Room 202 West Palm Beach, FL 33401	Marc A. Wites Wites Law Firm 4400 N. Federal Highway Lighthouse Point, FL 33064	Laura J. Stoll Goodwin Procter LLP 601 South Figueroa St. - 41st Floor Los Angeles, CA 90017

You do not need to attend or speak at the Fairness Hearing (described in Question 26 below) for your comments or objections to be considered. If you would like to speak at the Fairness Hearing about your comments or objections to the settlement, you must add to your letter a statement that you intend to appear and speak at the hearing, for example, by stating "This is my Notice of Intention to Appear in Coinbase Litigation."

You will have no right to speak at the hearing about the settlement or object if you choose to exclude yourself from the settlement, because the settlement no longer affects you if you opt out of it.

24. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object only if you stay in the Class. If you object, you will remain in the Class and will be bound by the proposed Settlement if the Court approves the Settlement, despite your objection. If you object, you can also participate in the Settlement benefits described above. Excluding yourself is telling the Court that you do not want to be part of the Class or the lawsuit. You cannot request exclusion and object to the Settlement. If you exclude yourself, you have no basis to object because the case no longer affects you. Class Members who do exclude themselves may, if they wish, enter an appearance through their own counsel.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement.
You may attend, and you may ask to speak, but you don't have to.

25. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Settlement Hearing at **10:00 a.m. on April 17, 2020** at the Courtroom of the Honorable Kenneth A. Marra, Paul G. Rogers Federal Building and U.S. Courthouse, 701 Clematis Street, Courtroom #4, West Palm Beach, FL 33401. The hearing date may be changed by the Court, and you should check www.coinbasesettlement.com for any updates. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement. The Court also may consider how much to award Co-Lead Counsel and the amount of the service award for Plaintiff. We do not know how long this decision will take.

The Court may reschedule the Fairness Hearing or change any of the deadlines described in this Notice. Be sure to check the website, www.coinbasesettlement.com for news of any such changes.

26. Do I have to come to the Fairness Hearing?

No. Co-Lead Counsel will answer questions the Court may have. But you are welcome to come at your own expense. If you submit an objection, you do not have to come to the Court to talk about it. As long as you delivered your written objection on time, the Court will consider it. You may attend (at your own expense) or pay your own lawyer to attend, but it is not necessary.

27. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Settlement Hearing. To do so, you must file with the Court a “Notice of Intention to Appear.” Be sure to include your name, address, telephone number, and your signature. You may be required also to provide proof that you are a Class Member. Your Notice of Intention to Appear must be filed no later than **March 13, 2020** and must be served on the Clerk of the Court, Co-Lead Counsel, and Defendants’ counsel at the addresses listed in section 24, above. You cannot speak at the hearing if you exclude yourself.

IF YOU DO NOTHING

28(A). What happens if I do nothing at all? (For Class Members who submitted approved and paid claims in the Cryptsy Case).

If (a) you made a claim in the Cryptsy Case, (b) your claim was approved, and (c) you received a settlement payment, you need not take any action to submit a claim and get money in this Coinbase Case. Your claim from the Cryptsy Case will be deemed approved and paid in this Coinbase Case, provided that the Court approves the settlement. If you wish to submit additional materials that show that you had more cryptocurrency at Cryptsy than you submitted with your Cryptsy Claim, you may do so by submitting a new Claim Form and the new supporting materials.

28(B). What happens if I do nothing at all? (For any Class Member who submitted a claim in the Cryptsy Case that was rejected or who did not submit a Claim in the Cryptsy Case).

If you submitted a claim in the Cryptsy Case that was rejected or if you did not submit a claim in the Cryptsy Case and you do nothing, you will get no money from the settlement with Coinbase, and claims you have against Coinbase will be released unless you separately write to exclude yourself (following the instructions in Question 20). This means you won’t be able to collect any money damages from Coinbase in this lawsuit or another lawsuit for its alleged conduct. To qualify to receive any money from the settlement with Coinbase, you must submit a Claim Form, following the instructions in Question 14 and in the Claim Form.

GETTING MORE INFORMATION

29. Are more details about the settlement and the lawsuit available?

Yes. This Notice summarizes the settlement. More details about the settlement are in the proposed Settlement Agreement itself. You can see or print copies of the Settlement Agreement at www.coinbasesettlement.com. More information about the ongoing class action lawsuit can also be viewed or printed at www.coinbasesettlement.com.

30. How do I get more information?

The website www.coinbasesettlement.com provides more information about the lawsuit and the settlement. In addition, if you have any questions about the lawsuit or this Notice, you may:

- Visit the Settlement website at www.coinbasesettlement.com.
- Visit the Public Access to Court Electronic Records (“PACER”) website: www.pacer.gov to review the Settlement Agreements by clicking on the “Find a Case” option and searching by Case Number for 9:16-cv-81992.
- Contact Co-Lead Class Counsel at:
Marc A. Wites, Wites Law Firm, 4400 N. Federal Highway, Lighthouse Point, FL 33064, (954) 933-4400
- Contact the Claims Administrator by mail, fax or phone:

Coinbase Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
Toll-free: (833) 277-8323
Facsimile: (215) 525-0209

**PLEASE DO NOT CONTACT THE COURT.
YOU SHOULD DIRECT ANY QUESTIONS YOU MAY HAVE ABOUT THE NOTICE AND/OR CLAIM FORM TO
THE CLAIMS ADMINISTRATOR AND/OR TO PLAINTIFF’S COUNSEL.**

You may also seek the advice and counsel of your own attorney at your own expense, if you desire.