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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

In re Silver Wheaton Corp.  
Securities Litigation

Master File No: 2:15-cv-05146-CAS-PJWx  
c/w: 2:15-cv-05173-CAS(PJWx)

Hon. Christina A. Snyder

**[PROPOSED] ORDER GRANTING PLAINTIFFS’ MOTION FOR  
DISTRIBUTION OF CLASS ACTION SETTLEMENT FUNDS**

IT IS HEREBY ORDERED THAT:

1. Plaintiffs’ Motion for Distribution of Class Action Settlement Funds is GRANTED.

2. As set forth in the Declaration of Paul Mulholland Concerning the Results of the Claims Administration Process (“Mulholland Declaration”), the administrative determinations of the Claims Administrator, Strategic Claims Services (“SCS”), in accepting and rejecting Claims are approved. Specifically, the administrative determinations of the Claims Administrator accepting those Claims set forth in Exhibits B-1 and B-2 to the Mulholland Declaration are approved. Likewise, the administrative determinations of the Claims Administrator rejecting those Claims set forth in Exhibits D and F of the Mulholland Declaration are

1 approved. The Court agrees with the Claims Administrator and rejects Claims 14267  
2 and 32761.

3 3. Any person asserting claims filed after March 25, 2021 or any  
4 responses to rejected claims after July 29, 2021, the dates used to finalize the  
5 administration by SCS, are finally and forever barred from asserting such claims.

6 4. The funds that are currently in the Net Settlement Fund<sup>1</sup> (less any  
7 necessary amounts to be withheld for payment of potential tax liabilities and related  
8 fees and expenses) shall be distributed on a *pro rata* basis to the Authorized  
9 Claimants, identified in Exhibits B-1 and B-2 to the Mulholland Declaration. The  
10 funds shall be distributed pursuant to the Stipulation and the Plan of Allocation of  
11 the Net Settlement Fund set forth in the Notice.

12 5. The distribution plan for the Net Settlement Fund as set forth in the  
13 Mulholland Declaration and accompanying exhibits is approved. The balance of the  
14 Net Settlement Fund shall be distributed to Authorized Claimants. The checks for  
15 distribution to Authorized Claimants shall bear the notation “CASH PROMPTLY,  
16 VOID AND SUBJECT TO RE-DISTRIBUTION 180 DAYS AFTER ISSUE  
17 DATE.” Plaintiffs’ Counsel and SCS are authorized to locate and/or contact any  
18 Authorized Claimant who has not cashed his, her, or its check within said time.  
19 Authorized Claimants who fail to negotiate a distribution check within the time  
20 allotted or consistent with the terms outlined in the Mulholland Declaration will  
21 irrevocably forfeit all recovery from the Settlement.

22 6. Pursuant to Section 7.7 of the Stipulation, “If any funds remain in the  
23 Net Settlement Fund by reason of uncashed checks, or otherwise, after the Claims  
24 Administrator has made reasonable and diligent efforts to have Authorized  
25 Claimants who are entitled to participate in the distribution of the Net Settlement  
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27 <sup>1</sup> Unless otherwise defined, capitalized terms herein have the same meanings  
28 attributed to them in the Stipulation and Agreement of Settlement (“Stipulation”) filed with the Court on February 11, 2020. (Dkt. No. 482-3).

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Fund cash their distribution checks, then any balance remaining in the Net Settlement Fund six (6) months after the initial distribution of such funds shall be used: (i) first, to pay any amounts mistakenly omitted from the initial distribution to Authorized Claimants or to pay any late, but otherwise valid and fully documented claims received after the cut-off date used to make the initial distribution, provided that such distributions to any late post-distribution claimants meet all of the other criteria for inclusion in the initial distribution, including the \$10.00 minimum check amount set forth in the Notice; (ii) second, to pay any additional Administrative Costs incurred in administering the Settlement; and (iii) finally, to make a second distribution to Authorized Claimants who cashed their checks from the initial distribution and who would receive at least \$10.00 from such second distribution, after payment of the estimated costs or fees to be incurred in administering the Net Settlement Fund and in making this second distribution, if such second distribution is economically feasible. If six (6) months after such second distribution, if undertaken, or if such second distribution is not undertaken, any funds shall remain in the Net Settlement Fund, any funds remaining in the Net Settlement Fund shall be donated to a non-profit charitable organization(s) selected by Plaintiffs' Counsel." Plaintiffs' counsel designation of the Howard University School of Law Investor Justice and Education Clinic is approved.

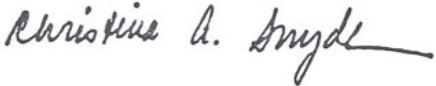
7. All persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of claims submitted herein, or otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund, are released and discharged from any and all claims arising out of such involvement, and all Class Members, whether or not they are to receive payment from the Net Settlement Fund, are barred from making any further claim against the Net Settlement Fund or the released person beyond the amount allocated to them pursuant to this Order.

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8. SCS is authorized to discard paper or hard copies of claims and all supporting document no less than one year after the second distribution of the Net Settlement Fund, if that occurs, or, if there is no second distribution, two years after the Initial Distribution. SCS is also authorized to destroy the electronic copies of the claims and all supporting documentation no less than one year after all funds have been distributed.

9. This Court retains jurisdiction over any further application or matter which may arise in connection with this action.

Dated: August 30, 2021

  
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HON. CHRISTINA A. SNYDER  
UNITED STATES DISTRICT JUDGE