

KEW MEDIA GROUP INC. CLASS ACTION NOTICE OF CERTIFICATION

Toronto, November 28, 2023

TO: All persons or entities who acquired securities issued by Kew Media Group Inc. in the secondary market between March 28, 2017 to January 16, 2020, inclusive, other than Kew Media Group Inc. and its directors and officers.

CERTIFICATION OF THIS ACTION AS A CLASS PROCEEDING

On July 20, 2020, an action was commenced in the Ontario Superior Court of Justice against Kew Media Group Inc., and certain of its officers and directors (the “Defendants”). The action alleges that the public filings of Kew Media Group Inc. contained false statements. The action seeks damages arising from a decline in the value of Kew Media Group Inc.’s securities.

The Court has not made a determination on the merits of the Plaintiffs’ claims or the defences that the Defendants will be delivering. The lawyers for the Plaintiffs will have to prove their claims in Court.

On November 2, 2023, the Ontario Superior Court of Justice certified this action as a class action as against Kew Media Group Inc. and granted leave to the Plaintiffs to pursue their claims against Kew Media Group Inc. under the Ontario *Securities Act*. Certification means that the lawsuit meets the requirements for a class action and may proceed to trial. The action was previously certified, on September 27, 2021, as a class action as against the individual defendants, Geoffrey Webb and Steven Silver.

WHO IS BOUND BY THE CLASS ACTION?

The Ontario Superior Court of Justice certified the class action on behalf of the following group (the “Class”):

All persons or entities who acquired securities issued by Kew Media Group Inc. in the secondary market between March 28, 2017 to January 16, 2020 inclusive, other than Kew Media Group Inc., and its directors and officers.

WHAT HAPPENS NEXT?

The parties will now engage in a process known as discovery where they exchange relevant documents and examine representative witnesses for each side.

The matter will then proceed to trial. At trial, a judge will decide, whether or not the claims will be successful and whether remedies should be ordered in favour of Class Members.

THE LAWYERS THAT REPRESENT THE CLASS MEMBERS

The law firms of Kalloghlian Myers ^{LLP} and Foreman & Company Professional Corporation (“Foreman & Company”) (collectively, “Class Counsel”) jointly represent the Class in the proceedings. Class Counsel will only be paid if they win a trial or if there is a settlement. The Plaintiffs have agreed with Class

Counsel that Class Counsel may seek legal fees totalling up to 33% of any judgment or settlement, plus repayment of disbursements and applicable taxes. The Court must approve their request to be paid. The fees and expenses could be deducted from any money obtained for the Class, or paid separately by the defendants. Class Counsel can be reached by mail, email, or by telephone, as provided below:

Foreman & Company

Attention: Kew Media Class Action
4 Covent Market Place
London, ON N6A 1E2
info@foremancompany.com
1 (855) 814-4575

Kalloghlian Myers LLP

Attention: Kew Media Class Action
35 Prince Arthur Avenue
Toronto, ON M5R 1B2
contact@kalloghlianmyers.com
(647) 243-7381

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SUPERIOR COURT OF JUSTICE**