

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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| VADIM KISILENKO, et al., On Behalf of Themselves and All Others Similarly Situated, |) | No. 3:99-CV-2872-M |
| |) | (Consolidated with No. 3:00-CV-290-M and |
| |) | 3:00-CV-713-T) |
| Plaintiffs, |) | |
| |) | <u>CLASS ACTION</u> |
| vs. |) | |
| |) | |
| STB SYSTEMS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
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NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS WHO PURCHASED OR ACQUIRED THE COMMON STOCK OF STB SYSTEMS, INC. ("STB") DURING THE PERIOD BEGINNING AUGUST 25, 1997 THROUGH MAY 1, 1998, INCLUSIVE

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS LITIGATION. PLEASE NOTE THAT IF YOU ARE A SETTLEMENT CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THIS FUND, YOU MUST SUBMIT A VALID PROOF OF CLAIM POSTMARKED ON OR BEFORE NOVEMBER 14, 2000.

This Notice has been sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of Texas, Dallas Division (the "Court"). The purpose of this Notice is to inform you of the proposed settlement of this class action litigation and of the hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the settlement. This Notice describes the rights you may have in connection with the settlement and what steps you may take in relation to the settlement and this class action litigation.

The proposed settlement creates a fund in the amount of \$4,700,000 in cash and will include interest that accrues on the fund prior to distribution. Based on Plaintiffs' Counsel's estimate of the number of shares entitled to participate in the settlement and the anticipated number of claims to be submitted by Class Members, the average distribution per share would be approximately \$0.31 before deduction of Court-approved fees and expenses. However, your actual recovery from this fund will depend on a number of variables, including the number of Claimants, the number of shares you purchased, the expense of administering the claims process, and the timing of your purchases and sales, if any.

Lead Plaintiffs and Defendants do not agree on the average amount of damages per share that would be recoverable if Lead Plaintiffs were to have prevailed on each claim asserted. The issues on which the Parties disagree include: (1) the appropriate economic model for determining the amount by which STB common stock was allegedly artificially inflated (if at all) during the Class Period; (2) the amount by which STB common stock was allegedly artificially inflated (if at all) during the Class Period; (3) the effect of various market forces influencing the trading price of STB common stock at various times during the Class Period; (4) the extent to which external factors, such as general market conditions, influenced the trading price of STB common stock at various times during the Class Period; (5) the extent to which the various matters that Lead Plaintiffs alleged were materially false or misleading influenced (if at all) the trading price of STB common stock at various times during the Class Period; (6) the extent to which the various allegedly adverse material facts that Lead Plaintiffs alleged were omitted influenced (if at all) the trading price of STB common stock at various times during the Class Period; and (7) whether the statements made or facts allegedly omitted were false, material or otherwise actionable under the federal securities laws.

The Lead Plaintiffs believe that the proposed settlement is a good recovery and is in the best interests of the Class. Because of the risks associated with continuing to litigate and proceeding to trial, there was a danger that Lead Plaintiffs would not have prevailed on any of their claims, in which case the Class would receive nothing. For example, Lead Plaintiffs faced the possibility that all or many of the claims in this case could have been dismissed. In addition, the amount of damages recoverable by the Class was and is challenged by Defendants. Recoverable damages in this case are limited to losses caused by conduct actionable under applicable law and, had the Litigation gone to trial, Defendants intended to assert that all or most of the losses of Class Members were caused by non-actionable market, industry or general economic factors. Defendants would also assert that throughout the Class Period the uncertainties and risks associated with STB's business and financial condition were fully and adequately disclosed.

Plaintiffs' Counsel have not received any payment for their services in conducting this Litigation on behalf of the Lead Plaintiffs and the members of the Settlement Class, nor have they been reimbursed for their out-of-pocket expenditures. If the settlement is approved

by the Court, counsel for the Lead Plaintiffs will apply to the Court for attorneys' fees of 30% of the settlement proceeds and reimbursement of out-of-pocket expenses not to exceed \$120,000, both to be paid from the Settlement Fund. If the amount requested by counsel is approved by the Court, the average cost per share would be \$0.10. Counsel for Lead Plaintiffs will also apply to the Court for a class representative award not to exceed \$2,500 to Lead Plaintiff Bess Rakow for her costs and expenses in representing the Class.

This Notice is not an expression of any opinion by the Court about the merits of any of the claims or defenses asserted by any party in this Litigation or the fairness or adequacy of the proposed settlement.

For further information regarding this settlement you may contact: Rick Nelson, Milberg Weiss Bershad Hynes & Lerach LLP, 600 West Broadway, Suite 1800, San Diego, California 92101, Telephone: 619/231-1058. Please do not call any representative of STB.

I. NOTICE OF HEARING ON PROPOSED SETTLEMENT

A settlement hearing (the "Settlement Hearing") will be held on October 24, 2000, at 10:00 a.m., before the Honorable Barbara M. G. Lynn, United States District Judge, at the Northern District of Texas, Dallas Division, 1100 Commerce Street, Dallas, Texas. The purpose of the Settlement Hearing will be to determine: (1) whether the settlement consisting of \$4,700,000 in cash plus accrued interest should be approved as fair, just, reasonable, and adequate to each of the parties; (2) whether the proposed plan to distribute the settlement proceeds (the "Plan of Allocation") is fair, just, reasonable, and adequate; (3) whether the proposed class representative award of up to \$2,500 to Lead Plaintiff Bess Rakow should be approved; (4) whether Plaintiffs' Counsel have adequately represented the Class; (5) whether the application by Plaintiffs' Counsel for an award of attorneys' fees and reimbursement of expenses should be approved; and (6) whether the Litigation should be dismissed with prejudice. The Court may adjourn or continue the Settlement Hearing without further notice to the Class.

II. DEFINITIONS USED IN THIS NOTICE

1. "Authorized Claimant" means any Class Member whose claim for recovery has been allowed pursuant to the terms of the Stipulation.

2. "Claimant" means any Class Member who files a Proof of Claim in such form and manner, and within such time, as the Court shall prescribe.

3. "Claims Administrator" means the firm of Gilardi & Co. LLC.

4. "Class" means all Persons who purchased or acquired STB stock between August 25, 1997 and May 1, 1998. Excluded from the Class are Defendants, members of the immediate families of the individual Defendants, any entity in which any Defendant has or had a controlling interest, and the legal representatives, heirs, successors, or assigns of any such excluded Person or entity.

5. "Class Member" or "Member of the Class" mean a Person who falls within the definition of the Class as set forth in ¶1.4 of the Stipulation.

6. "Defendants" means STB Systems, Inc. dba 3dfx Interactive, Inc., William E. Ogle, Randall D. Eisenbach, James L. Hopkins, J. Shane Long, Lawrence E. Wesneski, James J. Byrne, Dennis Sabo, CIBC Oppenheimer Corp., Hambrecht & Quist (now known as Chase Securities Inc.) and Hoak Breedlove Wesneski & Co.

7. "Escrow Agent" means the law firm of Milberg Weiss Bershad Hynes & Lerach LLP or its successor(s).

8. "Lead Plaintiffs" means Jay and Bess Rakow.

9. "Person" means an individual, corporation, partnership, limited partnership, association, joint stock company, estate, legal representative, trust, unincorporated association, government or any political subdivision or agency thereof, and any business or legal entity and their spouses, heirs, predecessors, successors, representatives, or assignees.

10. "Plan of Allocation" means a plan or formula of allocation of the Settlement Fund whereby the Settlement Fund shall be distributed to Authorized Claimants after payment of expenses of notice and administration of the settlement, Taxes and Tax Expenses and such attorneys' fees, costs, expenses and interest as may be awarded by the Court. Any Plan of Allocation is not part of the Stipulation and Defendants shall have no responsibility or liability with respect thereto.

11. "Related Parties" means each of the Defendants and each of their past or present directors, officers, employees, partners, members, principals, agents, insurers, co-insurers, reinsurers, controlling shareholders, attorneys, accountants or auditors, banks or investment banks, underwriters (including The Buckingham Research Group, Incorporated; BankAmerica Robertson Stephens; Credit Suisse First Boston Corporation; Donaldson, Lufkin & Jenrette Securities Corporation; Deutsche, Morgan Grenfell, Inc.; Goldman Sachs & Co.; Merrill Lynch Pierce, Fenner & Smith, Incorporated; Morgan Stanley & Co., Incorporated; NationsBanc Montgomery Securities LLC; Dain Rauscher Incorporated; J.C. Bradford & Co.; C. L. King & Associates, Inc.; and Soundview Financial Group and any other underwriters who might have participated in STB's March 20, 1998 offering of common stock), or investment banks, associates, personal or legal representatives, predecessors, successors, parents, subsidiaries, divisions, joint ventures, assigns, spouses, heirs, related or affiliated entities, any entity in

which a Defendant has a controlling interest, any members of their immediate families, or any trust of which any Defendant is the settlor or which is for the benefit of any Defendant and/or member(s) of his family.

12. "Released Claims" shall collectively mean all claims (including "Unknown Claims" as defined below, demands, rights, liabilities and causes of action of every nature and description whatsoever, known or unknown, whether or not concealed or hidden, asserted or that might have been asserted, including, without limitation, claims for negligence, gross negligence, breach of duty of care and/or breach of duty of loyalty, fraud, breach of fiduciary duty, or violations of any state or federal statutes, rules or regulations, by any Lead Plaintiff or Settlement Class Member against the Released Persons arising out of, based upon or related to both the purchase or acquisition of STB common stock by any Settlement Class Member during the Class Period and the facts, transactions, events, occurrences, acts, disclosures, statements, omissions or failures to act which were or could have been alleged in the Litigation, based upon the facts which were alleged.

13. "Released Persons" means each and all of the Defendants and their Related Parties, including their past and present directors, officers, employees, partners, members, principals and agents.

14. "Plaintiffs' Counsel" means counsel who have appeared for any of the plaintiffs in the Litigation.

15. "Settlement Class" or "Settlement Class Member" consist of or mean any Class Member who does not request exclusion from the Class as defined above.

16. "Settlement Fund" means the principal amount of Four Million Seven Hundred Thousand Dollars (\$4,700,000) paid pursuant to the Stipulation and delivered to the Escrow Agent, plus any accrued interest.

17. "Settling Parties" means, collectively, each of the Defendants and the Lead Plaintiffs on behalf of themselves and the members of the Settlement Class.

18. "Unknown Claims" means any Released Claims which any Lead Plaintiff or Settlement Class Member does not know or suspect to exist in his, her or its favor at the time of the release of the Released Persons which, if known by him, her or it, might have affected his, her or its settlement with and release of the Released Persons, or might have affected his, her or its decision not to object to this settlement.

III. THE LITIGATION

On or after December 17, 1999, the following class actions were filed in the United States District Court for the Northern District of Texas, Dallas Division: *Kisilenko, et al. v. 3dFX Interactive, Inc., Successor-in-Interest to STB Systems, Inc., et al.*, No. 3-99 CV 2872-D, and *Phillippy v. 3dFX Interactive, Inc., Successor-in-Interest to STB Systems, Inc., et al.*, No. 3-00 CV 0290-G. These cases were consolidated for all purposes by Order dated February 28, 2000.

On October 9, 1998, the following class action was filed in the County Court, Dallas County, Texas: *Brody v. STB Systems, Inc., et al.*, No. 98-9895-A. The *Brody* action was removed to the United States District Court for the Northern District of Texas, No. 3-00 CV-713-T. The *Brody* action was consolidated for all purposes with the *Kisilenko* case by Order dated May 15, 2000. These actions are collectively referred to herein as the "Litigation."

On May 12, 2000, the Court appointed Jay and Bess Rakow as Lead Plaintiffs under §21D(a)(3)(B) of the Securities Exchange Act of 1934 and approved Lead Plaintiffs' selection of Milberg Weiss Bershad Hynes & Lerach LLP as lead counsel and Stanley, Mandel & Iola, LLP as liaison counsel, pursuant to §21(D)(a)(3)(B)(v) of the Exchange Act.

IV. CLAIMS OF THE LEAD PLAINTIFFS AND BENEFITS OF SETTLEMENT

The Lead Plaintiffs believe that the claims asserted in the Litigation have merit and that the evidence developed to date supports the claims. However, counsel for the Lead Plaintiffs recognize and acknowledge the expense and length of continued proceedings necessary to prosecute the Litigation against the Defendants through trial and through appeals. Counsel for the Lead Plaintiffs also have taken into account the uncertain outcome and the risk of any litigation, especially in complex actions such as this Litigation, as well as the difficulties and delays inherent in such litigation. Counsel for the Lead Plaintiffs also are mindful of the inherent problems of proof under and possible defenses to the state and federal securities law violations asserted in the Litigation. Counsel for the Lead Plaintiffs believe that the settlement set forth in the Stipulation confers substantial benefits upon the Settlement Class. Based on their evaluation, counsel for the Lead Plaintiffs have determined that the settlement set forth in the Stipulation is in the best interests of the Lead Plaintiffs and the Settlement Class.

V. DEFENDANTS' STATEMENT AND DENIALS OF WRONGDOING AND LIABILITY

The Defendants have denied and continue to deny each and all of the claims and contentions alleged by the Lead Plaintiffs in the Litigation. Defendants expressly have denied and continue to deny all charges of wrongdoing or liability against them arising out of any of the conduct, statements, acts or omissions alleged, or that could have been alleged, in the Litigation. Defendants also have denied and continue to deny, *inter alia*, the allegations that the Lead Plaintiffs or the Class have suffered damage, that the price of STB common stock

was artificially inflated by reasons of alleged misrepresentations, non-disclosures or otherwise, or that the Lead Plaintiffs or the Class were harmed by the conduct alleged in the Litigation.

Nonetheless, the Defendants have concluded that further conduct of the Litigation would be protracted and expensive, and that it is desirable that the Litigation be fully and finally settled in the manner and upon the terms and conditions set forth in the Stipulation of Settlement. Defendants also have taken into account the uncertainty and risks inherent in any litigation, especially in complex cases like this Litigation. Defendants have, therefore, determined that it is desirable and beneficial to them that the Litigation be settled in the manner and upon the terms and conditions set forth in the Stipulation of Settlement.

VI. TERMS OF THE PROPOSED SETTLEMENT

Defendants have paid or caused to be paid into an escrow account, pursuant to the terms of the Stipulation of Settlement dated as of July 14, 2000 (the "Stipulation"), cash in the amount of \$4,700,000 which has been earning and will continue to earn interest for the benefit of the Settlement Class.

A portion of the settlement proceeds will be used for certain administrative expenses, including costs of printing and mailing this Notice, the cost of publishing a newspaper notice, payment of any taxes assessed against the Settlement Fund and costs associated with the processing of claims submitted. In addition, as explained below, a portion of the Settlement Fund may be awarded by the Court to counsel for Lead Plaintiffs as attorneys' fees and for reimbursement of out-of-pocket expenses. A portion of the Settlement Fund may also be awarded to Lead Plaintiff Bess Rakow as a class representative award. The balance of the Settlement Fund (the "Net Settlement Fund") will be distributed according to the Plan of Allocation described below to Settlement Class Members who submit valid and timely Proof of Claim forms.

VII. PLAN OF ALLOCATION

The Net Settlement Fund will be distributed to Settlement Class Members who submit valid, timely Proof of Claim forms ("Authorized Claimants") under the Plan of Allocation described below. The Plan of Allocation provides that you will be eligible to participate in the distribution of the Settlement Fund only if you have a net loss on all transactions in STB common stock during the Settlement Class Period.

For purposes of determining the amount an Authorized Claimant may recover under the Plan of Allocation, Lead Plaintiffs' counsel have consulted with their damage consultants and the Plan of Allocation reflects an assessment of the damages that could have been recovered as well as Lead Plaintiffs' counsel's assessment of the likelihood of establishing liability for various periods of the Class.

To the extent there are sufficient funds in the Net Settlement Fund, each Authorized Claimant will receive an amount equal to the Authorized Claimant's claim, as defined below. If, however, the amount in the Net Settlement Fund is not sufficient to permit payment of the total claim of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant's claim bears to the total of the claims of all Authorized Claimants. Payment in this manner shall be deemed conclusive against all Authorized Claimants.

The total of all profits shall be subtracted from the total of all losses from transactions during the Settlement Class Period to determine if a Settlement Class Member has a claim. Only if a Settlement Class Member had a net loss, after all profits from transactions in STB stock during the Settlement Class Period are subtracted from all losses, will such Class Member be eligible to receive a distribution from the Net Settlement Fund.

A claim will be calculated as follows:

1. For shares of STB Systems, Inc. common stock that were ***purchased or acquired on August 25, 1997 through May 1, 1998, including the March 20, 1998 Secondary Offering***, and
 - a) sold from August 25, 1997 through May 1, 1998, the claim per share is the difference between the price paid for the shares of STB Systems, Inc. common stock and the amount realized from the sale of any such shares; or
 - b) retained at the end of May 1, 1998, the claim per share is the difference between the price paid for the share of STB Systems, Inc. common stock and \$11.14 per share.

The date of purchase or sale is the "contract" or "trade" date as distinguished from the "settlement" date. The determination of the price paid per share and the price received per share, shall be exclusive of all commissions, taxes, fees and charges.

For Settlement Class Members who made multiple purchases or multiple sales during the Settlement Class Period, the earliest subsequent sale shall be matched with the earliest purchase and chronologically thereafter for purposes of the claim calculations.

The Court has reserved jurisdiction to allow, disallow or adjust the claim of any Settlement Class Member on equitable grounds.

VIII. ORDER CERTIFYING A CLASS FOR PURPOSES OF SETTLEMENT

On August 1, 2000, the Court certified a class, for settlement purposes only. The Settlement Class is defined above.

IX. PARTICIPATION IN THE CLASS

If you fall within the definition of the Class, you will remain a Class Member unless you elect to be excluded from the Class. If you do not request to be excluded from the Class, you will be bound by any judgment entered with respect to the settlement in the Litigation whether or not you file a Proof of Claim.

If you wish to remain a Settlement Class Member, you need do nothing (other than timely file a Proof of Claim and Release if you wish to participate in the distribution of the Net Settlement Fund). Your interests will be represented by Plaintiffs' Counsel. If you choose, you may enter an appearance individually or through your own counsel at your own expense.

TO PARTICIPATE IN THE DISTRIBUTION OF THE NET SETTLEMENT FUND, YOU MUST TIMELY COMPLETE AND RETURN THE PROOF OF CLAIM AND RELEASE FORM THAT ACCOMPANIES THIS NOTICE. The Proof of Claim and Release must be postmarked on or before November 14, 2000, and delivered to the Claims Administrator at the address below. Unless the Court orders otherwise, if you do not timely submit a valid Proof of Claim, you will be barred from receiving any payments from the Net Settlement Fund, but will in all other respects be bound by the provisions of the Stipulation and the Judgment.

X. EXCLUSION FROM THE CLASS

You may request to be excluded from the Class. To do so, you must mail a written request stating that you wish to be excluded from the Settlement Class to:

STB Securities Litigation
c/o Claims Administrator
Gilardi & Co. LLC
P.O. Box 5100
Larkspur, CA 94977-5100

The request for exclusion must state: (1) your name, address, and telephone number; and (2) all purchases and sales of STB common stock made during the Class Period, including the dates of each purchase or sale and the number of shares of STB common stock purchased or sold. **YOUR EXCLUSION REQUEST MUST BE POSTMARKED ON OR BEFORE SEPTEMBER 29, 2000.** If you submit a valid and timely request for exclusion, you shall have no rights under the settlement, shall not share in the distribution of the Net Settlement Fund, and shall not be bound by the Stipulation or the Judgment.

XI. DISMISSAL AND RELEASES

If the proposed settlement is approved, the Court will enter a Final Judgment and Order of Dismissal with Prejudice (the "Judgment"). The Judgment will dismiss the Released Claims with prejudice as to all Defendants.

The Judgment will provide that all Class Members who do not validly and timely request to be excluded from the Class shall be deemed to have released and forever discharged all Released Claims (to the extent Members of the Class have such claims) against all Released Persons.

XII. APPLICATION FOR FEES, EXPENSES AND AWARDS

At the Settlement Hearing, counsel for Lead Plaintiffs will request the Court to award attorneys' fees of 30% of the Settlement Fund, plus reimbursement of the expenses, not to exceed \$120,000, which were advanced in connection with the Litigation, plus interest thereon. In addition, Plaintiffs' Settlement Counsel will also seek up to \$2,500 for Lead Plaintiff Bess Rakow for her costs and expenses relating to her representation on behalf and for the benefit of Settlement Class Members. Settlement Class Members are not personally liable for any such fees, expenses or compensation.

To date, Plaintiffs' Counsel have not received any payment for their services in conducting this Litigation on behalf of Lead Plaintiffs and the Members of the Class, nor have counsel been reimbursed for their out-of-pocket expenses. The fee requested by Plaintiffs' Counsel would compensate counsel for their efforts in achieving the Settlement Fund for the benefit of the Settlement Class, and for their risk in undertaking this representation on a contingency basis. The fee requested is within the range of fees awarded to plaintiffs' counsel under similar circumstances in litigation of this type.

XIII. CONDITIONS FOR SETTLEMENT

The settlement is conditioned upon the occurrence of certain events described in the Stipulation. Those events include, among other things: (1) entry of the Judgment by the Court, as provided for in the Stipulation; and (2) expiration of the time to appeal from or alter or amend the Judgment. If, for any reason, any one of the conditions described in the Stipulation is not met, the Stipulation might be terminated and, if terminated, will become null and void, and the parties to the Stipulation will be restored to their respective positions as of May 3, 2000.

XIV. THE RIGHT TO BE HEARD AT THE HEARING

Any Class Member who has not validly and timely requested to be excluded from the Class, and who objects to any aspect of the settlement, the Plan of Allocation, the adequacy of representation by Plaintiffs' Counsel, the application for a class representative award of \$2,500, or the application for attorneys' fees, costs and expenses, may appear and be heard at the Settlement Hearing. Any such Person must submit and serve a written notice of objection, to be received on or before October 6, 2000, by each of the following:

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION
1100 Commerce Street, Room 14A20
Dallas, TX 75242

MILBERG WEISS BERSHAD
HYNES & LERACH LLP
KEITH F. PARK
JEFFREY D. LIGHT
600 West Broadway, Suite 1800
San Diego, CA 92101

BROBECK, PHLEGER &
HARRISON LLP
PAUL R. BESSETTE
301 Congress Avenue
Suite 1200
Austin, TX 78701

AKIN, GUMP, STRAUSS,
HAUER & FELD, L.L.P.
EDWARD S. KOPPMAN
1700 Pacific Avenue
Suite 4100
Dallas, TX 75201-4618

Plaintiffs' Settlement Counsel

Counsel for STB Defendants

Counsel for the Underwriters

The notice of objection must demonstrate the objecting Person's membership in the Class, including the number of STB shares purchased and sold during the Class Period, and contain a statement of the reasons for objection. Only members of the Settlement Class who have submitted written notices of objection in this manner will be entitled to be heard at the Settlement Hearing, unless the Court orders otherwise.

XV. SPECIAL NOTICE TO NOMINEES

If you hold or held any STB common stock purchased during the Class Period as nominee for a beneficial owner, then, within ten (10) days after you receive this Notice, you must either: (1) send a copy of this Notice and the Proof of Claim by first class mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Claims Administrator:

STB Securities Litigation
c/o Claims Administrator
Gilardi & Co. LLC
P.O. Box 5100
Larkspur, CA 94977-5100

If you choose to mail the Notice and Proof of Claim yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing.

Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for or advancement of reasonable administrative costs actually incurred or expected to be incurred in connection with forwarding the Notice and Proof of Claim and which would not have been incurred but for the obligation to forward the Notice and Proof of Claim, upon submission of appropriate documentation to the Claims Administrator.

XVI. EXAMINATION OF PAPERS

This Notice is a summary and does not describe all of the details of the Stipulation. For full details of the matters discussed in this Notice, you may review the Stipulation filed with the Court, which may be inspected during business hours, at the office of the Clerk of the Court, Northern District of Texas, Dallas Division, 1100 Commerce Street, Room 14A20, Dallas, TX 75242.

If you have any questions about the settlement of the Litigation, you may contact Plaintiffs' Settlement Counsel by writing:

MILBERG WEISS BERSHAD
HYNES & LERACH LLP
KEITH F. PARK
JEFFREY D. LIGHT
600 West Broadway, Suite 1800
San Diego, CA 92101

DO NOT TELEPHONE THE COURT REGARDING THIS NOTICE.

DATED: August 1, 2000

BY ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION