

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAYMOND BALESTRA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

ATBCOIN LLC, EDWARD NG, and
HERBERT W. HOOVER,

Defendants.

C.A. No. 1:17cv10001

Hon. Vernon S. Broderick

CLASS ACTION

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

[EXHIBIT A-2]

TO: ALL PERSONS OR ENTITIES THAT PURCHASED OR OTHERWISE ACQUIRED ATB TOKENS BETWEEN JUNE 12, 2017 AND SEPTEMBER 15, 2017, INCLUSIVE, WHILE LOCATED WITHIN THE UNITED STATES, AND WERE DAMAGED THEREBY (THE "CLASS").

THIS NOTICE WAS AUTHORIZED BY THE COURT. PLEASE READ IT CAREFULLY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on August 30, 2022 at 3:00 p.m. via telephone before the Hon. Vernon S. Broderick of the United States District Court for the Southern District of New York, using the dial-in 888-363-4749 and the access code 2682448, to determine whether, among other things: (1) the proposed settlement (the "Settlement") with ATBCOIN LLC, Edward Ng, and Herbert W. Hoover (the "Defendants") for \$250,000 in cash plus any earnings on any such monies should be approved by the Court as fair, reasonable, and adequate; (2) the proposed Final Judgment, dismissing and releasing various claims against the Settling Defendants, as provided for by the settling parties' Stipulation and Agreement of Settlement ("Stipulation"), should be entered; (3) the Proposed Plan

of Allocation should be approved; and (4) an award of attorneys' fees and expenses from the Settlement proceeds should be made.

This litigation is a securities class action brought on behalf of those who purchased or otherwise acquired ATB Tokens during the Class Period while located within the United States and were allegedly damaged thereby (the "Class Members") against the Defendants for allegedly issuing unregistered securities in violation of the federal securities laws. Lead Plaintiff alleges that these caused damages to Class Members. The Settling Defendants deny all of Lead Plaintiff's allegations.

IF YOU ARE A MEMBER OF THE CLASS DESCRIBED ABOVE, YOUR RIGHTS MAY BE AFFECTED BY THE PROPOSED SETTLEMENT, AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT FUND.

To be eligible to share in the distribution of the proposed Settlement Fund, you must establish your rights to do so by submitting a Proof of Claim form to the Claims Administrator so that it is received no later than August 23, 2022. Your failure to do so will preclude you from receiving any portion of the Settlement. Any objections to the proposed Settlement, Plan of Allocation, or application for an award of attorneys' fees and expenses must be filed and delivered to Lead Counsel for the Class and Defendants' Counsel at the addresses below as well as the Court: Clerk of the Court, United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007 received no later than August 9, 2022, in the manner and form explained in the full printed "Notice of Pendency and Proposed Settlement of Class Action" (the "Notice").

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A WRITTEN REQUEST FOR EXCLUSION BY AUGUST 9, 2022, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. IF YOU ARE A CLASS MEMBER AND DO NOT REQUEST EXCLUSION THEREFROM, YOU WILL BE BOUND BY THE SETTLEMENT AND BY ANY FINAL

JUDGMENT ENTERED IN THIS MATTER WHETHER OR NOT YOU
SUBMIT A PROOF OF CLAIM.

You may obtain the Notice as well as a copy of the Stipulation (which, among other things,
contains definitions for the defined terms used in this Summary Notice) and the proposed Final
Judgment, online at www.strategicclaims.net/ATB or by writing to the Claims Administrator:

Balestra v. ATBCOIN LLC
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
P.O. Box 230
Media, PA 19063
info@strategicclaims.net

**PLEASE *DO NOT* CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING
THIS NOTICE.** Inquiries, other than requests for the Notice or for a Proof of Claim form, may
be made to Lead Counsel or Settling Defendants' Counsel:

***Lead Counsel for Lead
Plaintiff***

Donald J. Enright
LEVI & KORSINSKY LLP
1101 30th Street, N.W., Suite 115
Washington, DC 20007

Defendants' Counsel:

Brian D. Caplan
Reitler Kailas & Rosenblatt, LLC
885 Third Avenue, 20th Floor
New York, NY 10022

Dated: March 29, 2022

HON. VERNON S. BRODERICK
U.S. DISTRICT COURT JUDGE