

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

SID MURDESHWAR, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

Case No.: 1:11-cv-20549-KMW

SEARCHMEDIA HOLDINGS LTD., *et al.*,

Defendants.

**NOTICE OF PENDENCY OF CLASS ACTION AND PROPOSED PARTIAL SETTLEMENT AND MOTION FOR FAIRNESS HEARING, ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

**IF YOU: (i) PURCHASED OR OTHERWISE ACQUIRED IDEATION ACQUISITION CORP. OR SEARCHMEDIA HOLDINGS LIMITED SECURITIES BETWEEN APRIL 1, 2009 AND AUGUST 20, 2010; OR (ii) HELD IDEATION ACQUISITION CORP. COMMON STOCK AS OF OCTOBER 2, 2009 AND WERE ELIGIBLE TO VOTE AT IDEATION'S OCTOBER 27, 2009 SPECIAL MEETING, YOU COULD GET A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

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

- If approved by the United States District Court for the Southern District of Florida (the "Court"), the Settlement will provide \$2,750,000 (the "Cash Settlement Amount") to pay claims to investors who held Ideation common stock on October 2, 2009 and were therefore eligible to vote at Ideation's October 27, 2009 special meeting.
- This partial Settlement arises from a class action lawsuit entitled *Sid Murdeshwar v. SearchMedia Holdings Ltd., et al.*, Case Number 11-cv-20549, involving Ideation Acquisition Corp., which merged and later changed its name to SearchMedia Holdings Limited (referred to in this Notice as either "Ideation" or "SearchMedia"). This partial Settlement resolves claims against the Settling Defendants (identified below), who were alleged to have issued false or misleading statements regarding the financial condition of, and the extent of the due diligence efforts in relation to Ideation's acquisition of, SearchMedia International Limited ("SMIL"). The Class is represented in the Action by Court-appointed Lead Counsel, Saxena White P.A. and Glancy Binkow & Goldberg LLP ("Lead Counsel").
- Your legal rights are affected whether you act or do not act. Read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>Submit a Claim Form by June 22, 2012:</b>	The only way to get a payment.
<b>Exclude Yourself by April 2, 2012:</b>	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against the Released Parties about the Settled Claims.
<b>Object by April 2, 2012:</b>	Write to the Court about why you do not like the Settlement.
<b>Go to a Hearing on April 23, 2012:</b>	Ask to speak in Court about the Settlement.
<b>Do Nothing</b>	Get no payment. Give up rights.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

**SUMMARY NOTICE**

Statement of Class Recovery

Pursuant to the Settlement described here and in the Stipulation and Agreement of Partial Settlement, a Cash Settlement Amount in the amount of \$2,750,000 has been established, and will be deposited into the Settlement Fund. Lead Counsel estimate that there were approximately 9,184,445 shares of Ideation common stock which were eligible to vote on the merger and which therefore allegedly may have been damaged. Lead Counsel estimates that the average recovery under the Settlement is \$0.30 per allegedly damaged Ideation share, before the deduction of Court-approved costs, expenses and attorneys' fees. A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that Class Member's Recognized Claim as compared to the total Recognized Claims of all Class Members who submit valid Proofs of Claim.

Statement of Potential Outcome of Case

Lead Counsel and Settling Defendants' Counsel disagree on both liability and damages, and do not agree on the amount of damages that would be recoverable if the Class were to have prevailed on each claim alleged. The Settling Defendants deny that they are liable to the Class and deny that the Class has suffered any loss. While Lead Counsel believe that the Class has meritorious claims, they recognize that there are significant obstacles to be overcome before there could be any recovery against the Settling Defendants.

Statement of Attorneys' Fees and Costs Sought

Class Counsel are moving the Court to award them attorneys' fees not to exceed 33 1/3 percent of the Settlement Fund, and for expenses actually incurred in connection with the prosecution of the case. The requested attorneys' fees would amount to an average of \$0.10 per allegedly damaged Ideation share. Lead Counsel has expended considerable time and effort in the prosecution of this Action on a contingent fee basis, and have advanced all the expenses of the litigation in the expectation that if they were successful in obtaining a recovery for the Class they would be paid from such recovery. All Counsel Fees and Expenses must be approved by the Court. The fee requested is within the range of fees awarded to counsel under similar circumstances in litigation of this type.

Reasons for the Settlement

Lead Counsel believe that the proposed partial Settlement is an excellent recovery and is in the best interests of the Class. Because of the risks associated with continuing to litigate the claims against the Settling Defendants and proceeding to trial against the Settling Defendants, there was a danger that the Class would not have prevailed on any of its claims against the Settling Defendants, in which case the Class would have received nothing from the Settling Defendants. The amount of damages recoverable by the Class from the Settling Defendants was and is challenged by the Settling Defendants. Recoverable damages in this case are limited to losses caused by conduct actionable under applicable law and, had the case gone to trial, the Settling Defendants would have asserted that all or most of the Class Members' losses were caused by others or by non-actionable market, industry or general economic factors.

For the Settling Defendants, who deny all allegations of wrongdoing or liability asserted against them, the principal reason for the Settlement is to eliminate the expense, risks, and uncertain outcome of the litigation.

Further Information

Further information regarding this case and Settlement may be obtained by contacting Lead Counsel: Joseph E. White, III, Saxena White P.A., 2424 N. Federal Highway, Suite 257, Boca Raton, Florida, 33431, telephone 1-800-361-4128 or Lionel Z. Glancy, Glancy Binkow & Goldberg LLP, 1801 Avenue of the Stars, Suite 311, Los Angeles, California, 90067, telephone 310-201-9150. **Please do not contact the Court, the Settling Defendants, or Settling Defendants' Counsel with questions about the Settlement.**

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**BASIC INFORMATION**

1. Why did I get this Notice package?
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You or someone in your family may have purchased Ideation or SearchMedia securities during the Class Period or held Ideation common stock on October 2, 2009 and were therefore eligible to vote at Ideation’s October 27, 2009 special meeting.

The Court directed that this Notice be sent to possible Class Members because they have a right to know about the proposed partial Settlement of this class action lawsuit, and about all of their options, before the Court decides whether to approve the Settlement.

This package explains the lawsuit, the Settlement, Class Members’ legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of this case is the United States District Court for the Southern District of Florida, Judge Kathleen M. Williams presiding, Case No. 11-cv-20549.

2. What is this lawsuit about?
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Ideation was a special purpose acquisition company (“SPAC”) that was formed for the sole purpose of merging with another company. The Amended Complaint (“Complaint”) alleges that the Settling Defendants targeted SMIL, an operator of outdoor billboard and in-elevator advertising networks headquartered in China, as a target for acquisition. The Settling Defendants allegedly were negligent in their due diligence on SMIL and missed several “red flags” concerning SMIL’s accounting irregularities. As a result, the proxy documents issued by the Settling Defendants in anticipation of the merger allegedly contained materially false information regarding SMIL’s financial results and condition. The Complaint further alleges that persons who acquired Ideation and SearchMedia securities during the Class Period or who held Ideation common stock as of October 2, 2009 and who were entitled to vote on the merger at Ideation’s October 27, 2009 special meeting were damaged when they relied on allegedly-false statements in SearchMedia’s press releases, public filings, and the proxy documents and were denied the opportunity to make an informed decision on the Ideation-SMIL merger.

The Complaint was filed after an investigation by Lead Counsel that included, among other things, review and analysis of documents filed by SearchMedia with the United States Securities and Exchange Commission (“SEC”), press releases, newspaper articles, and other public statements issued by or concerning SearchMedia and current or former officers of SearchMedia; and other publicly available information and data concerning SearchMedia and the merger with SMIL.

The lawsuit seeks money damages against the Settling Defendants and others for alleged violations of Sections 10(b), 14(a), and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j, 78n, 78(o). The Settling Defendants deny all allegations of misconduct by them, and deny having engaged in any wrongdoing whatsoever.

Only the Settling Defendants have agreed to a settlement of this case. The Settling Defendants are SearchMedia Holdings Limited, Robert Fried, Phillip Frost, Rao Uppaluri, Steven Rubin, Glenn Halpryn, Thomas Beier, David Moskowitz, and Shawn Gold. Claims for violations of the federal securities laws are still pending against the Non-Settling Defendants, who are SMIL, Garbo Lee, Qinying Liu, Earl Yen, Jennifer Huang, and Paul Conway. The Non-Settling Defendants are not parties to this Settlement and have not agreed to settle the case against them.

3. Why is this a class action?
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In a class action, one or more people called class representatives sue on behalf of people who have similar claims. All of these people are a Class or Class Members. Bringing a case, such as this one, as a class action allows adjudication of many similar claims of persons and entities that might be economically too small to bring in individual cases. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a settlement?

The Court did not decide in favor of the Class or of the Settling Defendants. Instead, both sides agreed to a Settlement. That way, they avoid the risks and costs of trial and appeals, and the people affected will get compensation.

**WHO IS IN THE SETTLEMENT**

To see if you will get money in the future from this Settlement, you first have to decide if you are a Class Member.

5. How do I know if I am part of the Settlement?

The Court ordered that everyone who fits this description is a Class Member: all persons or entities who: (i) purchased or otherwise acquired SearchMedia or Ideation securities between April 1, 2009 and August 20, 2010, inclusive; or (ii) held common stock of Ideation on October 2, 2009, and were eligible to vote at Ideation's October 27, 2009, special meeting.

6. Are there exceptions to being included?

Yes. Excluded from the Class are: all Defendants, the officers and directors of Ideation, SearchMedia and SMIL, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which Defendants have or had a controlling interest, China Seed Ventures, L.P., Deutsche Bank AG, Le Yang, Sun Hing Associates LTD., and Vervain Equity Investments Limited. Also excluded from the Class are all persons and entities who submit a valid request for exclusion, as described in more detail below.

If one of your mutual funds owned SearchMedia or Ideation common stock, that alone does not make you a Class Member. You are a Class Member only if you individually (i) purchased or otherwise acquired SearchMedia or Ideation securities during the Class Period; or (ii) held Ideation common stock on October 2, 2009 and were eligible to vote at Ideation's October 27, 2009 special meeting. Check your investment records or contact your broker to see if you purchased these securities or held this stock.

7. What if I am still not sure I am included?

If you are still not sure whether you are included, you can ask for free help. You can call toll-free 1-800-231-1815, or visit [www.searchmediasettlement.com](http://www.searchmediasettlement.com) for more information. Or you can fill out and return the Proof of Claim described in Question 10 to see if you qualify.

**THE SETTLEMENT BENEFITS: WHAT YOU GET**

8. What does the Settlement Provide?

In exchange for the settlement and dismissal of the case and the release of all Settled Claims (defined below) against the Released Parties (defined below), the Settling Defendants have agreed to create a \$2,750,000 fund to be divided, after the withdrawal of fees and expenses that are approved by the Court, among all Class Members who send in a valid Proof of Claim.

9. How much will my payment be?

If you are an eligible Class Member, your share of the fund will depend on a number of variables, including how many (i) SearchMedia or Ideation securities you purchased or otherwise acquired during the Class Period and when you sold them; or (ii) shares of Ideation common stock you held on October 2, 2009, and when you sold those shares (or if you held them). You can calculate your claim in accordance with the formula shown below in the Plan of Allocation. It is unlikely that you will get a payment that covers all of your losses. After all Class Members have sent in their Proofs of Claim, the payment you get will be part of the Net Settlement Fund equal to your claim, divided by the total of everyone's claim. See the Plan of Allocation for more information on your claim.

For Ideation common stock held on October 2, 2009, and eligible to vote at Ideation's October 27, 2009, special meeting:

- A. For shares held at the end of trading on November 17, 2010, the Recognized Loss shall be that number of shares multiplied by the lesser of:
  - (1) \$1.75 per share; or
  - (2) the difference between the purchase price per share and \$2.40.<sup>1</sup>
- B. For shares sold between October 3, 2009 and August 19, 2010, the Recognized Loss shall be that number of shares multiplied by the lesser of:

<sup>1</sup> Pursuant to Section 21(D)(e)(1) of the Private Securities Litigation Reform Act of 1995, "in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated." \$2.40 was the mean closing price of SearchMedia common stock during the 90-day period beginning on August 20, 2010 and ending on November 17, 2010.

- (1) \$1.75 per share less the applicable sales date artificial inflation per share figure, as found in Table A; or
- (2) the difference between the purchase price per share and the sales price.

C. For shares sold between August 20, 2010 and November 17, 2010, the Recognized Loss shall be the lesser of:

- (1) \$1.75 per share; or
- (2) the difference between the purchase price per share and the average closing price of SearchMedia common stock between August 20, 2010 and the date of sale.<sup>2</sup>

**Table A**

Sales Date Range	Artificial Inflation Per Share
10/23/2009 – 12/22/2009	\$1.75
12/23/2009 – 03/31/2010	\$1.18
04/01/2010 – 08/19/2010	\$0.77

Because the Court dismissed all claims against the Settling Defendants brought on behalf of all persons or entities who purchased or otherwise acquired SearchMedia securities between April 1, 2009 and August 20, 2010, inclusive, those persons and entities will not receive a payment from the Settlement Fund.

**HOW YOU GET A PAYMENT: SUBMITTING A PROOF OF CLAIM FORM**

10. How can I get a payment?

To qualify for payment, you must send in a Proof of Claim. A Proof of Claim is attached to this Notice. You may also get a Proof of Claim at [www.searchmediasettlement.com](http://www.searchmediasettlement.com), or by calling toll-free 1-800-231-1815. Read the instructions carefully, fill out the form, include all documents the form asks for, sign it, and mail it postmarked no later than June 22, 2012.

11. When would I get my payment?

The Court will hold a hearing on April 23, 2012 at 1:00 pm, to decide whether to approve the Settlement. If the Court approves the Settlement, there may be subsequent appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. It also takes time for all Proofs of Claim to be processed. Please be patient.

12. What am I giving up by staying in the Class and seeking a payment?

Unless you exclude yourself, you are staying in the Class, and that means that once the Settlement becomes effective you will release all Settled Claims (as defined below) against the Released Parties (as defined below). You will not in the future be able to bring a case asserting any Settled Claims against any of the Released Parties. If you remain a member of the Class, all of the Court's orders will apply to you and legally bind you.

"Settled Claims" means any and all claims, debts, demands, rights, causes of action or liabilities, of every nature and description whatsoever, whether fixed or contingent, accrued or unaccrued, liquidated or unliquidated, based in law or equity, or based on any foreign, federal, state, local, statutory or common law, or any other law, rule or regulation (including any claims for violations of Fed. R. Civ. P. 11), including both known claims and Unknown Claims that have been or could have been asserted in any forum by any Class Member, or the successors or assigns of any of them, whether directly, indirectly, derivatively, representatively or in any other capacity against any of the Released Parties, which arise out of, relate to, or are based upon, in any way, directly or indirectly, (a) the allegations, transactions, facts, events, matters, occurrences, acts, representations or omissions involved, set forth, or referred to, or that could have been asserted in the Action, or (b) the purchase, acquisition, sale, disposition or transfer of Ideation or SearchMedia securities by any Class Member, including without limitation all claims arising out of or relating to any disclosures, public filings, registration statements or other statement by any or all of the Released Parties. Settled Claims does not mean or include claims, if any, against the Released Parties arising under the Employee Retirement Income Security Act of 1974, 29 U.S.C. § 1001, *et seq.*, which are not common to all Class Members. Settled Claims does not include claims relating to the enforcement of the Settlement or the terms of this Stipulation. Settled Claims also does not include any claim against the Non-Settling Defendants.

"Settling Defendants" means SearchMedia, Robert Fried, Phillip Frost, Rao Uppaluri, Steven Rubin, Glenn Halpryn, Thomas Beier, David Moskowitz, and Shawn Gold.

"Non-Settling Defendants" means SMIL, Garbo Lee, Qinying Liu, Earl Yen, Jennifer Huang, and Paul Conway.

"Released Parties" and "Released Party" means the Settling Defendants and includes the Settling Defendants' and Ideation's

<sup>2</sup> Pursuant to Section 21(D)(e)(2) of the Private Securities Litigation Reform Act of 1995, "in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, if the plaintiff sells or repurchases the subject security prior to the expiration of the 90-day period described in paragraph (1), the plaintiff's damages shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the security and the mean trading price of the security during the period beginning immediately after dissemination of information correcting the misstatement or omission and ending on the date on which the plaintiff sells or repurchases the security."

directors, officers, employees, agents, consultants, attorneys, accountants, auditors, underwriters, partners, insurers, reinsurers, personal representatives, spouses, issues, heirs, executors, administrators, predecessors, successors, assigns, parent corporations, subsidiaries, divisions, and affiliates, or any other individual or entity in which the Settling Defendants or Ideation had or have a controlling interest. Released Parties does not include the Non-Settling Defendants.

“Unknown Claims” means any and all Settled Claims that any Class Member does not know or suspect to exist in his, her or its favor at the time of the release of the Released Parties, and any of Settled Defendants’ Claims that Settling Defendants do not know or suspect to exist in its favor, which if known by him, her, or it might have affected his, her or its decision(s) with respect to the Settlement. With respect to any and all Settled Claims and Settled Defendants’ Claims, the Released Parties and each Class Member, acting through Lead Counsel, shall each, for themselves and all persons claiming by, through, or on behalf of them, be deemed to have waived, and by operation of the Order and Final Judgment shall have expressly waived, any and all provisions, rights and benefits conferred by any law of any state or territory of the United States, or principle of common law, that is similar, comparable, or equivalent to Cal. Civ. Code § 1542 and Section 20-7-11 of the South Dakota Codified Laws, each of which provides that a general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release, which if known by him must have materially affected his settlement with the debtor.

### EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, but you want to keep any right you may have to sue or continue to sue the Released Parties, on your own, about the Settled Claims, then you must take steps to get out. This is called excluding yourself from the Settlement, or is sometimes referred to as “opting out” of the Settlement. The Settling Defendants may withdraw from and terminate the Settlement if more than a certain number of claimants exclude themselves from the Settlement.

13. How do I get out of the proposed Settlement?

You cannot exclude yourself by telephone or by email. To exclude yourself from the Settlement, you must send a signed letter by mail stating that you “request exclusion from the Settlement in the Murdeshwar v. SearchMedia Holdings Litigation, Case No. 11-cv-20549.” Your letter should state the dates, prices, and amount of all purchases and sales of Ideation common stock and SearchMedia securities. Please be sure to include your name, address, telephone number and your signature. If the exclusion request is made by someone other than the Class Member directly, the person or entity submitting the exclusion request must provide documentation evidencing authority to submit the exclusion request on behalf of the Class Member. You must mail your exclusion request postmarked no later than April 2, 2012 to:

SearchMedia Holdings, Ltd. Settlement  
Exclusions  
c/o GCG  
P.O. Box 9349  
Dublin, OH 43017-4249

If you ask to be excluded, you will not get any Settlement payment, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) the Released Parties in the future.

14. If I do not exclude myself, can I sue the Released Parties for the same thing later?

No. Unless you exclude yourself, you give up any right to sue any of the Released Parties for any and all Settled Claims. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from *this* Class to continue your own lawsuit. Remember, the exclusion deadline is April 2, 2012.

15. If I exclude myself, can I get money from the proposed Settlement?

No. If you exclude yourself, you will not be able to send in a Proof of Claim to ask for any money. But you may sue, continue to sue, or be part of a different lawsuit against the Released Parties.

### THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

The Court appointed the law firms Saxena White P.A. and Glancy Binkow & Goldberg LLP to represent all Class Members. These law firms and their lawyers are called Lead Counsel. You will not be separately charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Lead Counsel has not received any payment for their services in pursuing the claims against the Settling Defendants on behalf of the Class, nor have they been reimbursed for their litigation expenses. Lead Counsel will ask the Court to award

attorneys' fees from the Settlement Fund in an amount not to exceed 33⅓ percent of the Settlement Fund, and for reimbursement of their expenses incurred in prosecuting the case not to exceed \$175,000. Lead Counsel's motion for attorneys' fees and reimbursement of litigation expenses will be posted on the website for this case, [www.searchmediasettlement.com](http://www.searchmediasettlement.com), promptly after being filed. The fee requested by Lead Counsel would compensate them for their efforts in achieving the Settlement for the benefit of the Class and for the risk in undertaking the Action on a contingency basis. A request of 33⅓ percent may be determined by the Court to be reasonable given: (a) the result achieved; (b) the novelty and difficulty of the claims; (c) the risk that the Class would not prevail; (d) the quality of counsels' representation; and (e) the fees awarded in similar cases. The Court will determine the amount of the reward.

Lead Counsel, without further notice to the Class, may subsequently apply to the Court for fees and expenses incurred in connection with administering and distributing the Settlement proceeds to the members of the Class and any proceedings subsequent to the Fairness Hearing.

### **OBJECTING TO THE SETTLEMENT**

You can tell the Court that you do not agree with the Settlement or some part of it.

18. How do I tell the Court that I do not like the proposed Settlement?

If you are a Class Member, you can object to the Settlement or any of its terms, the Plan of Allocation and/or the application by Lead Counsel for an award of fees and expenses. You may give your reasons why you think the Court should not approve any or all of the Settlement terms. The Court will consider your views if you serve a proper objection within the deadline identified, and according to the following procedures.

To object, you must send a signed letter by mail stating that you object to the Settlement in the *Murdeswar v. SearchMedia Holdings* Litigation, Case No. 11-cv-20549. You cannot object by telephone or email. Be sure to include your name, address, telephone number, your signature, and the reasons why you object to the Settlement. Also be sure to include the dates, prices, and amount of all purchases and sales of Ideation common stock and SearchMedia securities. Your objection must be sent to the Court, and served on all the following counsel, on or before April 2, 2012:

#### **Court**

Clerk of Court  
U.S. District Court  
400 North Miami Ave.  
Miami, FL 33128  
*Murdeswar v. SearchMedia Holdings*  
Litigation,  
Case No. 11-cv-20549

#### **Lead Counsel**

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Los Angeles, CA 90067

#### **Settling Defendants' Counsel**

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HOLLAND & KNIGHT LLP  
701 Brickell Avenue  
Suite 3000  
Miami, FL 33131

You do not need to go to the Fairness Hearing to have your written objection considered by the Court.

Unless otherwise ordered by the Court, any Class Member who does not object in the manner described in this Notice will be deemed to have waived any objection and will not be able to make any objection to the Settlement in the future.

19. What is the difference between objecting and excluding yourself?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be a part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

### **THE COURT'S SETTLEMENT 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 do not have to.

20. When and where will the Court decide whether to approve the proposed Settlement?

The Court will hold a Fairness Hearing at 1:00 pm, on April 23, 2012, at the United States District Court, 400 North Miami Ave., Miami, Florida 33128. At the Fairness Hearing, the Court will decide whether the Settlement is fair, reasonable and adequate. The Court will also consider the Plan of Allocation and the application for attorneys' fees and reimbursement of expenses. If there are any 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. We do not know how long these decisions will take.

You should be aware that the Court may change the date and time of the hearing. Thus, if you want to come to the hearing, you should check with the Court before coming to be sure that the date and/or time has not changed.

21. Do I have to come to the hearing?

No. Lead Counsel will answer any questions that the Court may have. But you are welcome to come at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but your lawyer's attendance is not necessary. Class Members do not need to appear at the hearing to indicate their approval of the Settlement.

22. May I speak at the hearing?

If you object to the Settlement, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include with your objection (see question 18 above) a statement saying that you intend to appear. You cannot speak at the hearing if you excluded yourself from the Class, or if you have not provided written notice of your intention to speak by the deadline identified, and in accordance with the procedures described in Questions 18 and 20.

#### IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will get no money from this Settlement and you will be precluded from filing or continuing a lawsuit against any of the Released Parties about any of the Settled Claims, as described in Question 12. To receive a payment, you must submit a Proof of Claim in accordance with the procedures in Question 10.

#### GETTING MORE INFORMATION

24. Are there more details about the proposed Settlement?

The easiest way to get more details is by visiting [www.searchmediasettlement.com](http://www.searchmediasettlement.com), where you can view the Stipulation and Agreement of Partial Settlement filed with the Court and other relevant documents. You can also get a copy of the Stipulation and Agreement of Partial Settlement by contacting the Claims Administrator at SearchMedia Holdings, Ltd. Settlement, c/o GCG, P.O. Box 9349, Dublin, OH 43017-4249.

25. How do I get more information?

For even more detailed information concerning the matters involved in this case, reference is made to the pleadings, the Stipulation and Agreement of Partial Settlement, the Orders entered by the Court and the other papers filed in the case, which may be inspected during regular business hours at the Office of the Clerk of the Court, U.S. District Court, 400 North Miami Ave., Miami, Florida 33128. PLEASE DO NOT CONTACT THE COURT, THE SETTLING PARTIES OR SETTLING DEFENDANTS' COUNSEL REGARDING THIS NOTICE OR FOR MORE INFORMATION.

You can also call the Claims Administrator toll-free at 1-800-231-1815; write to SearchMedia Holdings, Ltd. Settlement, c/o GCG, P.O. Box 9349, Dublin, OH 43017-4249; or visit [www.searchmediasettlement.com](http://www.searchmediasettlement.com).

#### SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

If you purchased or acquired SearchMedia securities during the Class Period or held Ideation common stock on October 2, 2009, for the beneficial interest of a person or organization other than yourself, the Court has directed that, WITHIN 7 DAYS OF YOUR RECEIPT OF THIS NOTICE, you either (a) provide to the Claims Administrator the name and last known address of each person or organization for whom or which you transacted in such securities during such time period or (b) request additional copies of the Notice, which will be provided to you free of charge, and within 7 days mail the Notice directly to the beneficial owners of the securities referred to herein. If you choose to follow alternative procedure (b), the Court has directed that, upon such mailing, you send a statement to the Claims Administrator confirming that the mailing was made as directed. You will be entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Those expenses will be paid upon request and submission of appropriate supporting documentation at the appropriate time. All communications concerning the foregoing should be addressed to the Claims Administrator:

SearchMedia Holdings, Ltd. Settlement  
c/o GCG  
P.O. Box 9349  
Dublin, OH 43017-4249

Dated: Miami, Florida  
January 9, 2011

By Order of the Court  
CLERK OF THE COURT