

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

In re Lihua International, Inc. Securities Litigation	No. 14-CV-5037-RA-RLE CLASS ACTION
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**NOTICE OF PENDENCY AND
SETTLEMENT OF CLASS ACTION**

If you purchased or otherwise acquired the common stock of Lihua International, Inc. (“Lihua” or the “Company”) during the period from August 9, 2012 through and including April 30, 2014, you could get a payment from a class action settlement (the “Settlement”).

Under law, a federal court has authorized this Notice.

- If approved by the Court, the Settlement will provide \$2,865,000, plus any interest earned thereon (the “Settlement Amount”), to pay claims of investors who purchased Lihua common stock during the period from August 9, 2012 through and including April 30, 2014 (the “Class Period”).
- The Settlement represents an average recovery of \$0.317 per share for the 9,027,890 million estimated shares that Lead Plaintiff alleges were damaged and declined in value as a result of Defendants’ alleged misconduct during the Class Period. This is not an estimate of the actual recovery per share you should expect. Your actual recovery will depend on the aggregate losses of all Class Members, the date(s) you purchased and sold Lihua common stock and the total number and amount of claims filed.
- Attorneys for the Lead Plaintiff (“Class Counsel”) intend to ask the Court to award them fees of \$555,810 (19.4% of the Settlement Amount), reimbursement of litigation expenses of no more than \$100,000 and an award to the Lead Plaintiff not to exceed \$25,000. Collectively, the attorneys’ fees are estimated to average \$0.075 per Lihua share. If approved by the Court, these amounts will be paid from the Settlement Fund.
- The approximate recovery, after deduction of attorneys’ fees and expenses approved by the Court, is an average of \$0.242 per Lihua share. This estimate is based on the assumptions set forth in the preceding paragraph. Your actual recovery, if any, will vary depending on your purchase price and sales price, and the number and amount of claims filed.
- The Settlement resolves the lawsuit concerning whether Lihua and its officers and directors made false and misleading statements, in violation of federal securities laws, based upon the allegations set forth in the Second Amended Complaint, including that: (1) Lihua failed to disclose certain debts and loans; and (2) Lihua failed to disclose cash flow problems. Defendants Lihua, Robert C. Bruce, Daphne Yan Huang, Siu Ki “Kelvin” Lau, and Jonathan P. Serbin (the “Defendants”) deny all allegations of misconduct.
- Your legal rights will be affected whether you act or do not act. If you do not act, you may permanently forfeit your right to recover on this claim. Therefore, you should read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A PROOF OF CLAIM FORM NO LATER THAN OCTOBER 4, 2017	The only way to get a payment.
EXCLUDE YOURSELF NO LATER THAN OCTOBER 23, 2017	Get no payment. This is the only option that allows you to be part of any other lawsuit against the Defendants about the legal claims in this case.
OBJECT NO LATER THAN NOVEMBER 7, 2017	Write to the Court about why you do not like the settlement.
GO TO A HEARING ON NOVEMBER 21, 2017	Speak in Court about the fairness of the settlement.
DO NOTHING	Get no payment. Give up rights.

INQUIRIES

Please do not contact the Court regarding this notice. All inquiries concerning this Notice, the Proof of Claim and Release form, or any other questions by Class members should be directed to:

Lihua International, Inc. Litigation c/o Strategic Claims Services 600 N. Jackson St., Ste. 3 Media, PA 19063 Tel.: 866-274-4004 Fax: 610-565-7985 info@strategicclaims.net	Or	THE ROSEN LAW FIRM, P.A. 275 Madison Avenue, 34 th Floor New York, NY 10016 Tel.: 212-686-1060 Fax: 212-202-3827 info@rosenlegal.com
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COMMON QUESTIONS AND ANSWERS CONCERNING THE SETTLEMENT

1. Why did I get this Notice?

You or someone in your family may have acquired Lihua common stock during the Class Period.

2. What is this lawsuit about?

The case is known as *In re Lihua International, Inc. Securities Litigation*, 14-cv-5037-RA-RLE (the “Class Action”), and the Court in charge of the case is the United States District Court for the Southern District of New York.

The Class Action involves whether the Defendants violated the federal securities laws because the Company allegedly made false and misleading statements to the investing public as set out in the Second Amended Complaint, including that: (1) Defendants failed to disclose Lihua’s debts and loans; and (2) Defendants failed to disclose Lihua’s cash flow problems. Defendants deny they did anything wrong. The Settlement resolves all of the claims in the Class Action against the Defendants.

3. Why is this a class action?

In a class action, one or more persons and/or entities, called Lead Plaintiffs, sue on behalf of all persons and/or entities who have similar claims. All of these persons and/or entities are referred to collectively as a Class, and these individual persons and/or entities are known as Class Members. One court resolves all of the issues for all Class Members, except for those Class Members who exclude themselves from the Class.

4. Why is there a Settlement?

Lead Plaintiff and Defendants do not agree about the merits of Lead Plaintiff's allegations with respect to liability or the average amount of damages per share that would be recoverable if Lead Plaintiff were to prevail at trial on each claim. The issues on which the Lead Plaintiff and Defendants disagree include: (1) whether Defendants made false and misleading statements or omitted to disclose material facts; (2) whether Defendants made these statements or omissions with the intent to defraud the investing public; (3) whether the statements or omissions were the cause of the Class Members' alleged damages; and (4) the amount of damages, if any, suffered by the Class Members.

This matter has not gone to trial, and the Court has not decided in favor of either Lead Plaintiff or Defendants. Instead, Lead Plaintiff and Defendants have agreed to settle the Class Action. The Lead Plaintiff and Class Counsel believe the settlement is best for all Class Members because of the risks associated with continued litigation and the nature of the defenses raised by the Defendants. Even if Plaintiffs were to win at trial and also withstand Defendants' inevitable challenge on appeal, Plaintiffs might not be able to collect some, or all, of the judgment.

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

To be a Class Member, you must have purchased or otherwise acquired Lihua common stock during the period from August 9, 2012 through and including April 30, 2014.

6. Are there exceptions to being included?

Yes. Excluded from the Class are Defendants, and all officers, directors, and control persons of Lihua, and the members of such excluded persons' immediate families, legal representatives, heirs, predecessors, successors, and assigns, and any entity in which any excluded person has or had a controlling interest. Also, if you exclude yourself from the Class, as described below, you are not a part of the Class. You are also excluded from the Class if you have a net profit in purchases and sales of Lihua common stock or otherwise suffered no compensable damages during the Class Period.

7. What does the Settlement provide?

a. What is the Settlement Fund?

The proposed Settlement calls for Defendants to create a Settlement Fund (the "Settlement Fund") in the amount of \$2,865,000. A derivative case against Lihua captioned *In re Lihua International, Inc. Shareholder Derivative Action*, 14-cv-03543-RA-RLE ("Derivative Case") has also been settled. \$1.2 million of the Settlement Fund results from a payment from the recovery earned in the Derivative Case. The Settlement is subject to Court approval and settlement of our case is contingent upon approval of settlement of the Derivative Case. Also, subject to the Court's approval, a portion of the Settlement Fund will be used to pay Lead Plaintiff's attorneys' fees and reasonable litigation expenses and any award to Lead Plaintiff. A portion of the Settlement Fund also will be used to pay taxes due on interest earned by the Settlement Fund, if necessary, and any notice and claims administration expenses permitted by the Court. After the foregoing deductions from the Settlement Fund have been made, the amount remaining (the "Net Settlement Fund") will be distributed to Class Members who submit valid claims ("Authorized Claimants").

b. What can you expect to receive under the proposed Settlement?

Your share of the Net Settlement Fund will or may depend on: (i) the number of claims filed; (ii) the dates you purchased and sold Lihua common stock; (iii) the prices of your purchases and sales; (iv) the amount of administrative costs, including the costs of notice; and (v) the amount awarded by the Court to Lead Plaintiff and Class Counsel for attorneys' fees, costs, and expenses.

The compensable loss per share ("Recognized Loss") of each Authorized Claimant shall be calculated according to the following formula:

PROPOSED PLAN OF ALLOCATION OF THE NET SETTLEMENT FUND

The Plan of Allocation is a matter separate and apart from the proposed Settlement, and any decision by the Court concerning the Plan of Allocation shall not affect the validity or finality of the proposed Settlement. The Court may approve the Plan of Allocation with or without modifications agreed to among the parties, or another plan of allocation, without further notice to Class Members. Any orders regarding a modification of the Plan of Allocation will be posted to the Claims Administrator's website, www.strategicclaims.net.

The Claims Administrator shall determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant's Recognized Loss. **Please Note:** The Recognized Loss formula, set forth below, is not intended to be an estimate of the amount of what a Class Member might have been able to recover after a trial, nor is it an estimate of the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Loss formula is the basis upon which the Net Settlement Fund will be proportionately allocated to the Authorized Claimants. To the extent there are sufficient funds remaining in the Net Settlement Fund, each Authorized Claimant will receive an amount equal to the Authorized Claimant's Recognized Loss. If, however, Net Settlement Fund is not sufficient to permit payment of the total Recognized Loss of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant's Recognized Loss bears to the total Recognized Losses of all Authorized Claimants (*i.e.*, "*pro rata* share"). Payment in this manner shall be deemed conclusive against all Authorized Claimants. No distribution will be made on a claim where the potential distribution amount is less than ten dollars (\$10.00) in cash.

If any of the Net Settlement Fund remains by reason of uncashed checks, or otherwise, after the Claims Administrator has made reasonable and diligent efforts to have Authorized Claimants who are entitled to participate in the distribution of the Net Settlement 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 Notice and Administrative Expenses 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 after the Claims Administrator has made reasonable and diligent efforts to have Authorized Claimants who are entitled to participate in this Settlement cash their checks, any funds remaining in the Net Settlement Fund shall be donated to a non-profit 501(c)(3) organization(s) selected by Class Counsel.

THE BASIS FOR CALCULATING YOUR RECOGNIZED LOSS:

Each Authorized Claimant shall be allocated a *pro rata* share of the Net Settlement Fund based on his, her or its Recognized Loss as compared to the total Recognized Losses of all Authorized Claimants.

1. For shares of common stock purchased between August 9, 2012 and April 29, 2014, inclusive:

- A. For shares retained at the end of trading on September 23, 2014¹, the Recognized Loss shall be the lesser of:
 - (1) \$4.10 per share; or
 - (2) the difference between the purchase price per share and \$0.13 per share.²
- B. For shares sold between August 9, 2012 and April 29, 2014, inclusive, the Recognized Loss shall be zero.
- C. For shares sold on April 30, 2014, the Recognized Loss shall be the lesser of:
 - (1) \$2.27 per share; or
 - (2) the difference between the purchase price per share and the sales price per share.
- D. For shares sold between June 26, 2014³ and September 23, 2014, inclusive, the Recognized Loss shall be the lesser of:
 - (1) \$4.10 per share; or
 - (2) the difference between the purchase price per share and the average closing stock price as of date of sale provided in table A below.

2. For shares of common stock purchased on April 30, 2014:

- A. For shares retained at the end of trading on September 23, 2014, the Recognized Loss shall be the lesser of:
 - (1) \$4.10 per share; or
 - (2) the difference between the purchase price per share and \$.13 per share.
- B. For shares sold on April 30, 2014, the Recognized Loss shall be the lesser of:
 - (1) \$2.27 per share; or
 - (2) the difference between the purchase price per share and the sales price per share.
- C. For shares sold between June 26, 2014 and September 23, 2014, inclusive, the Recognized Loss shall be the lesser of:
 - (1) \$4.10 per share; or
 - (2) the difference between the purchase price per share and the average closing stock price as of date of sale provided in table A below.

For purposes of calculating your Recognized Loss, the date of purchase, acquisition or sale is the “contract” or “trade” date and not the “settlement” or “payment” date. The receipt or grant by gifts, transfers, inheritance or operation of law of Lihua common shares shall not be deemed a purchase, acquisition or sale of Lihua and common shares for the calculation of an Authorized Claimant’s Recognized Loss.

¹ This is the last day of the 90-day Look-Back Period.

² Pursuant to Section 21(D)(e)(1) of the Private Securities Litigation Reform Act of 1995, “in any private action arising under this chapter 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.” \$0.13 per share was the mean (average) daily closing trading price of Lihua’s common stock during the 90-day period beginning on June 26, 2014 and ending on September 23, 2014 (“90-day Look-Back Period”). The common shares were suspended from trading from April 30, 2014 to June 25, 2014.

³ Lihua’s common shares were suspended from trading on NASDAQ from April 30, 2014 to June 25, 2014 and no shares traded during that time period.

For purposes of calculating your Recognized Loss, all purchases during the Class Period are first matched up to any sales during the Class Period. Therefore, on the Proof of Claim enclosed with this Notice, you must provide all of your purchases and sales of Lihua common shares during the time period from August 9, 2012 through and including September 23, 2014.

Payment pursuant to the Plan of Allocation approved by the Court shall be conclusive against all Authorized Claimants. No person shall have any claim against Defendants, Defendants' Counsel, Lead Plaintiff, Class Counsel or the Claims Administrator or other agent designated by Class Counsel based on the distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. Each claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to the claimant's Proof of Claim and Release form. All persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the claims submitted in connection with the Settlement, or otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund, shall be 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, will be barred from making any further claim against the Net Settlement Fund beyond the amount allocated to them as provided in any distribution orders entered by the Court.

TABLE A						
<u>Date</u>	<u>Closing Price</u>	<u>Average Closing Price</u>		<u>Date</u>	<u>Closing Price</u>	<u>Average Closing Price</u>
6/26/2014	\$0.29	\$0.29		8/12/2014	\$0.14	\$0.16
6/27/2014	\$0.29	\$0.29		8/12/2014	\$0.17	\$0.16
6/30/2014	\$0.30	\$0.29		8/13/2014	\$0.17	\$0.16
7/1/2014	\$0.32	\$0.30		8/14/2014	\$0.17	\$0.16
7/2/2014	\$0.30	\$0.30		8/15/2014	\$0.15	\$0.16
7/3/2014	\$0.28	\$0.30		8/18/2014	\$0.15	\$0.16
7/7/2014	\$0.12	\$0.27		8/19/2014	\$0.13	\$0.16
7/8/2014	\$0.12	\$0.25		8/20/2014	\$0.12	\$0.16
7/9/2014	\$0.09	\$0.23		8/21/2014	\$0.13	\$0.16
7/10/2014	\$0.09	\$0.22		8/22/2014	\$0.12	\$0.15
7/11/2014	\$0.10	\$0.21		8/25/2014	\$0.12	\$0.15
7/14/2014	\$0.09	\$0.20		8/26/2014	\$0.11	\$0.15
7/15/2014	\$0.09	\$0.19		8/27/2014	\$0.12	\$0.15
7/16/2014	\$0.09	\$0.18		8/28/2014	\$0.12	\$0.15
7/17/2014	\$0.10	\$0.18		8/29/2014	\$0.12	\$0.15
7/18/2014	\$0.08	\$0.17		9/2/2014	\$0.11	\$0.15
7/21/2014	\$0.09	\$0.17		9/3/2014	\$0.08	\$0.15
7/22/2014	\$0.10	\$0.16		9/4/2014	\$0.08	\$0.15
7/23/2014	\$0.10	\$0.16		9/5/2014	\$0.07	\$0.15
7/24/2014	\$0.09	\$0.16		9/8/2014	\$0.09	\$0.14
7/25/2014	\$0.11	\$0.15		9/9/2014	\$0.07	\$0.14
7/28/2014	\$0.11	\$0.15		9/10/2014	\$0.08	\$0.14

7/29/2014	\$0.11	\$0.15		9/11/2014	\$0.07	\$0.14
7/30/2014	\$0.20	\$0.15		9/12/2014	\$0.06	\$0.14
7/31/2014	\$0.21	\$0.15		9/15/2014	\$0.06	\$0.14
8/1/2014	\$0.20	\$0.16		9/16/2014	\$0.06	\$0.14
8/4/2014	\$0.17	\$0.16		9/17/2014	\$0.07	\$0.14
8/5/2014	\$0.20	\$0.16		9/18/2014	\$0.07	\$0.13
8/6/2014	\$0.18	\$0.16		9/19/2014	\$0.07	\$0.13
8/7/2014	\$0.15	\$0.16		9/22/2014	\$0.06	\$0.13
8/8/2014	\$0.15	\$0.16		9/23/2014	\$0.06	\$0.13

To the extent a claimant had a trading gain or “broke even” from his, her or its overall transactions in Lihua shares during the Class Period, the value of the Recognized Loss will be zero and the claimant will not be entitled to a share of the Net Settlement Fund. To the extent that a claimant suffered a trading loss on his, her or its overall transactions in Lihua shares during the Class Period, but that trading loss was less than the Recognized Loss calculated above, then the Recognized Loss shall be limited to the amount of the claimant’s actual trading loss.

The covering purchase of a short sale is not an eligible purchase. The purchase and sales prices exclude any brokerage commissions, transfer taxes or other fees.

All Class Members whose claims are not approved by the Court will be barred from participating in distributions from the Net Settlement Fund, but otherwise shall be bound by all of the terms of the Settlement, including the terms of the Order and Final Judgment to be entered in the Action and will be barred from bringing any Settled Claims against Defendants or any Released Parties, including Unknown Claims (as those terms are defined in the Stipulation and Agreement of Settlement, which is available on the Internet at www.strategicclaims.net, or through the mail upon request to the Claims Administrator). The Plan of Allocation is subject to Court approval and may be modified by the Court.

8. How can I get a payment?

To qualify for a payment, you must send in a form entitled “Proof of Claim and Release” (the “Proof of Claim”). This claim form is attached to this Notice. You may also obtain a claim form on the Internet at www.strategicclaims.net. Read the instructions carefully, fill out the form, sign it in the location indicated, and mail the Proof of Claim form together with all documentation requested in the form, postmarked no later than October 4, 2017, to:

Lihua International, Inc. Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

The Claims Administrator will process your claim and determine whether you are an “Authorized Claimant.”

9. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you will remain in the Class. That means that if the Settlement is approved, you and all Class Members will release (agreeing never to sue, continue to sue, or be part of any other lawsuit) all claims against the Defendants, their past or present or future subsidiaries, parents,

affiliates, principals, successors and predecessors, assigns, officers, directors, shareholders, trustees, partners, agents, fiduciaries, contractors, employees, and attorneys (including in-house counsel and outside attorneys), auditors, and insurers; the immediate family members, representatives, and heirs of the Individual Defendants; any trust of which any Individual Defendant is the settlor or which is for the benefit of any immediate family member of any Individual Defendant; any firm, trust, corporation, or entity in which any of the Defendants has a controlling interest; and any of the legal representatives, heirs, successors in interest or assigns of the Defendants, in connection with your acquisition of Lihua common stock during the Class Period, except that you do not release the Released Parties from any claim or action to enforce the Settlement. It also means that all of the Court's orders will apply to you and legally bind you. If you sign the Proof of Claim form, you are agreeing to a "Release of Claims," which will bar you from ever filing a lawsuit against any Released Party to recover losses from the acquisition or sale of Lihua common stock during the Class Period, except to enforce the Settlement. That means you will accept a share in the Net Settlement Fund as sole compensation for any losses you have suffered in the acquisition and sale of Lihua common stock during the Class Period.

10. How do I get out of the Settlement?

If you do not want to receive a payment from this Settlement, and you want to keep any right you may have to sue or continue to sue any of the Defendants on your own based on the legal claims raised in this Class Action, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement. To exclude yourself from the Settlement, you must mail a letter stating you want to be excluded as a Class Member from *In re Lihua International, Inc. Securities Litigation*, 14-cv-5037-RA-RLE. To be valid, your request must include your name, address, telephone number, e-mail address (if any), and your signature, along with an accurate list of all of your purchases and sales of Lihua common stock during the Class Period (including the date, number of shares, and the price of the shares purchased or sold). You must mail your exclusion request so that it is received no later than October 23, 2017, to both:

Lihua International, Inc. Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
Media, PA 19063

And to

Douglas W. Greene, Esq.
LANE POWELL, PC
1420 Fifth Avenue, Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402

You cannot exclude yourself by telephone or by e-mail. If you ask to be excluded, you will not receive a settlement payment, and you cannot object to the Settlement. If you ask to be excluded, you will not be legally bound by anything that happens in this Class Action.

11. If I do not exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue any of the Defendants for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately, since you may have to exclude yourself from this Class to continue your own lawsuit.

12. Do I have a lawyer in this case?

The Court appointed The Rosen Law Firm, P.A. as Lead Counsel, also referred to as Class Counsel, to represent you and the Class Members. If you want to be represented by your own lawyer, you may hire one at your own expense. Contact information for The Rosen Law Firm, P.A. is provided below.

13. How will the lawyers be paid?

Class Counsel have expended considerable time litigating this action on a contingent fee basis, and they have paid for the expenses of the litigation themselves and have not been paid attorneys’ fees in advance of this Settlement. Class Counsel have done so with the expectation that if they are successful in recovering money for the Class, they will receive attorneys’ fees and be reimbursed for their litigation expenses from the Settlement Fund, as is customary in this type of litigation. Class Counsel will not receive attorneys’ fees or be reimbursed for their litigation expenses except from the Settlement Fund. Therefore, Class Counsel will file a motion asking the Court at the Settlement Hearing to make an award of attorneys’ fees of \$555,810 (19.4% of the Settlement Amount), reimbursement of litigation expenses of no more than \$100,000, and an award to the Lead Plaintiff not to exceed \$25,000. The Court may award less than these amounts. Any amounts awarded by the Court will come out of the Settlement Fund.

14. How do I tell the Court if I do not like the Settlement?

You can tell the Court you do not agree with the Settlement, any part of the Settlement, or Class Counsel’s motion for attorneys’ fees, litigation expenses, and an award to the Lead Plaintiff, by mailing a letter stating that you object to the Settlement in the matter of *In re Lihua International, Inc. Securities Litigation*, 14-cv-5037-RA-RLE. Be sure to include your name, address, telephone number, e-mail address (if any), your signature, a list of your purchases and sales of Lihua common stock during the Class Period, including dates, number of shares, and the prices of the shares purchased or sold, in order to show your membership in the Class, and all of the reasons you object to the Settlement. Be sure to mail the objections to the three different places listed below, to be received no later than November 7, 2017, so the Court will consider your views:

Clerk of the Court United States District Court Southern District of New York 500 Pearl Street New York, NY 10007	Laurence M. Rosen, Esq. THE ROSEN LAW FIRM, P.A. 275 Madison Avenue, 34 th Floor New York, NY 10016 Telephone: (212) 686-1060 Fax: (212) 202-3827	Douglas W. Greene, Esq. LANE POWELL, PC 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 Seattle, WA 98111-9402 Telephone: (206) 223-7000 Fax: (206) 223-7107
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15. What is the difference between objecting and requesting exclusion?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Class. Requesting exclusion is telling the Court you do not want to be part of the Class and Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer concerns you. If you stay in the Class and object, but your objection is overruled, you will not be allowed a second opportunity to exclude yourself.

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

The Court will hold a Settlement Hearing on November 21, 2017, at 10:00 a.m. in the United States District Court for the Southern District of New York, Courtroom 1506, 40 Foley Square, New York, NY 10007.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Settlement. If there are objections, the Court will consider them, and the Court

will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel for attorneys' fees and expenses.

17. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mail your written objection on time, the Court will consider it.

18. What happens if I do nothing at all?

If you do nothing, you will not receive a payment from the Settlement. However, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants about the claims made in this case ever again.

DATED: JULY 21, 2017.

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

PROOF OF CLAIM AND RELEASE

Deadline for Submission: October 4, 2017

IF YOU PURCHASED COMMON STOCK OF LIHUA INTERNATIONAL, INC. DURING THE PERIOD FROM AUGUST 9, 2012 THROUGH APRIL 30, 2014, INCLUSIVE (THE “CLASS PERIOD”), YOU ARE A “CLASS MEMBER” AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT PROCEEDS.

IF YOU ARE A CLASS MEMBER, YOU MUST COMPLETE AND SUBMIT THIS FORM IN ORDER TO BE ELIGIBLE FOR ANY SETTLEMENT BENEFITS.

YOU MUST COMPLETE AND SIGN THIS PROOF OF CLAIM AND RELEASE (“PROOF OF CLAIM”) AND MAIL IT BY FIRST CLASS MAIL, POSTMARKED NO LATER THAN OCTOBER 4, 2017 TO STRATEGIC CLAIMS SERVICES, THE CLAIMS ADMINISTRATOR, AT THE FOLLOWING ADDRESS:

Lihua International, Inc. Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

YOUR FAILURE TO SUBMIT YOUR CLAIM BY OCTOBER 4, 2017 WILL SUBJECT YOUR CLAIM TO REJECTION AND PRECLUDE YOUR RECEIVING ANY MONEY IN CONNECTION WITH THE SETTLEMENT OF THIS ACTION. DO NOT MAIL OR DELIVER YOUR CLAIM TO THE COURT OR TO ANY OF THE PARTIES OR THEIR COUNSEL, AS ANY SUCH CLAIM WILL BE DEEMED NOT TO HAVE BEEN SUBMITTED. SUBMIT YOUR CLAIM ONLY TO THE CLAIMS ADMINISTRATOR.

CLAIMANT’S STATEMENT

1. I (we) purchased Shares of Lihua International, Inc. (“Lihua”) Common Stock and was (were) damaged thereby. (Do not submit this Proof of Claim if you did not purchase Lihua common stock during the designated Class Period).
2. By submitting this Proof of Claim, I (we) state that I (we) believe in good faith that I am (we are) a Class Member as defined above and in the Notice of Pendency and Settlement of Class Action (the “Notice”), or am (are) acting for such person(s); that I am (we are) not a Defendant in the Actions or anyone excluded from the Class; that I (we) have read and understand the Notice; that I (we) believe that I am (we are) entitled to receive a share of the Net Settlement Fund, as defined in the Notice; that I (we) elect to participate in the proposed Settlement described in the Notice; and that I (we) have not filed a request for exclusion. (If you are acting in a representative capacity on behalf of a Class Member [e.g., as an executor, administrator, trustee, or other representative], you must submit evidence of your current authority to act on behalf of that Class Member. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.)
3. I (we) consent to the jurisdiction of the Court with respect to all questions concerning the validity of this Proof of Claim. I (we) understand and agree that my (our) claim may be subject to investigation and discovery under the Federal Rules of Civil Procedure, provided that such investigation and

discovery shall be limited to my (our) status as a Class Member(s) and the validity and amount of my (our) claim. No discovery shall be allowed on the merits of the Action or Settlement in connection with processing of the Proof of Claim.

4. I (we) have set forth where requested below all relevant information with respect to each purchase of Lihua common stock during the Class Period, and each sale, if any, of such securities. I (we) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so.
5. I (we) have enclosed photocopies of the stockbroker's confirmation slips, stockbroker's statements, or other documents evidencing each purchase, sale or retention of Lihua common stock listed below in support of my (our) claim. (IF ANY SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN A COPY OR EQUIVALENT DOCUMENTS FROM YOUR BROKER BECAUSE THESE DOCUMENTS ARE NECESSARY TO PROVE AND PROCESS YOUR CLAIM.)
6. I (we) understand that the information contained in this Proof of Claim is subject to such verification as the Claims Administrator may request or as the Court may direct, and I (we) agree to cooperate in any such verification. (The information requested herein is designed to provide the minimum amount of information necessary to process most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your Recognized Loss. In some cases, the Claims Administrator may condition acceptance of the claim based upon the production of additional information, including, where applicable, information concerning transactions in any derivatives securities such as options.)
7. Upon the occurrence of the Court's approval of the Settlement, as detailed in the Notice, I (we) agree and acknowledge that my (our) signature(s) hereto shall effect and constitute a full and complete release, remise and discharge by me (us) and my (our) heirs, joint tenants, tenants in common, beneficiaries, executors, administrators, predecessors, successors, attorneys, insurers and assigns (or, if I am (we are) submitting this Proof of Claim on behalf of a corporation, a partnership, estate or one or more other persons, by it, him, her or them, and by its, his, her or their heirs, executors, administrators, predecessors, successors, and assigns) of each of the "Released Parties" of all "Settled Claims," as defined in the Stipulation and Agreement of Settlement.
8. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All Claimants **MUST** submit a manually signed paper Proof of Claim form listing all their transactions whether or not they also submit electronic copies. If you wish to file your claim electronically, you must contact the Claims Administrator at 1-866-274-4004 or visit their website at www.strategicclaims.net to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

I. CLAIMANT INFORMATION

Name:		
Address:		
City:	State:	ZIP:
Foreign Provence:	Foreign Country:	
Day Phone:	Evening Phone:	
Email:		
Social Security Number (for individuals):	OR	Taxpayer Identification Number (for estates, trusts, corporations, etc.)

II. SCHEDULE OF TRANSACTIONS IN LIHUA COMMON STOCK

Beginning Holdings:

A. State the total number of shares of Lihua common stock owned at the close of trading on August 8, 2012, long or short (*must be documented*).

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Purchases:

B. Separately list each and every open market purchase of Lihua common stock during the period from August 9, 2012 through September 23, 2014, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically) (Month/Day/Year)	Number of shares Purchased	Price per share	Total Cost (Excluding Commissions, Taxes, and Fees)

Sales:

C. Separately list each and every sale of Lihua common stock during the period from August 9, 2012 through September 23, 2014, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically) (Month/Day/Year)	Number of shares Sold	Price per share	Amount Received (Excluding Commissions, Taxes, and Fees)

Ending Holdings:

D. State the total number of shares of Lihua common stock owned at the close of trading on September 23, 2014, long or short (*must be documented*).

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If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification number at the top of each sheet.

III. SUBSTITUTE FORM W-9

Request for Taxpayer Identification Number:

Enter taxpayer identification number below for the Beneficial Owner(s). For most individuals, this is your Social Security Number. The Internal Revenue Service (“I.R.S.”) requires such taxpayer identification number. If you fail to provide this information, your claim may be rejected.

Social Security Number (for individuals)	or	Taxpayer Identification Number (for estates, trusts, corporations, etc.)
_____		_____

IV. CERTIFICATION

I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code because: (a) I am (We are) exempt from backup withholding, or (b) I (We) have not been notified by the I.R.S. that I am (we are) subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the I.R.S. has notified me (us) that I am (we are) no longer subject to backup withholding.

NOTE: If you have been notified by the I.R.S. that you are subject to backup withholding, please strike out the language that you are not subject to backup withholding in the certification above.

UNDER THE PENALTIES OF PERJURY UNDER THE LAWS OF THE UNITED STATES, I (WE) CERTIFY THAT ALL OF THE INFORMATION I (WE) PROVIDED ON THIS PROOF OF CLAIM AND RELEASE FORM IS TRUE, CORRECT AND COMPLETE.

Signature of Claimant (If this claim is being made on behalf of Joint Claimants, then each must sign):

(Signature)

(Signature)

(Capacity of person(s) signing, e.g. beneficial purchaser(s), executor, administrator, trustee, etc.)

Check here if proof of authority to file is enclosed.
(See Item 2 under Claimant's Statement)

Date: _____

THIS PROOF OF CLAIM MUST BE POSTMARKED NO LATER THAN OCTOBER 4, 2017, AND MUST BE MAILED TO:

Lihua International, Inc. Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
info@strategicclaims.net

Each Proof of Claim shall be deemed to have been submitted when legibly postmarked (if properly addressed and mailed by first-class mail) provided such Proof of Claim is actually received before the filing of a motion for an Order of the Court approving distribution of the Net Settlement Fund. In all other cases, a Proof of Claim shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to process fully all of the Proofs of Claim and to administer the Settlement. This work will be completed as promptly as time permits, given the need to investigate and tabulate each Proof of Claim. Please notify the Claims Administrator of any change of address.

Lihua International, Inc. Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste. 3
Media, PA 19063

IMPORTANT LEGAL DOCUMENT – PLEASE FORWARD

REMINDER CHECKLIST

- Please be sure to sign this Proof of Claim on page 15. If this Proof of Claim is submitted on behalf of joint claimants, then both claimants must sign.
- Please remember to attach supporting documents. Do NOT send any stock certificates. Keep copies of everything you submit.
- Do NOT use highlighter on the Proof of Claim or any supporting documents.
- If you move after submitting this Proof of Claim, please notify the Claims Administrator of the change in your address.