

**IN THE SUPERIOR COURT OF FULTON COUNTY
BUSINESS CASE DIVISION
STATE OF GEORGIA**

IN RE ENDOCHOICE HOLDINGS, INC.
SECURITIES LITIGATION

CIVIL ACTION NO. 2016 CV 277772

**(Consolidated with Civil Action
No. 2016 CV 281193)**

NOTICE OF FILING HUGHES AFFIDAVIT

Please take notice that Plaintiffs Jesse L. Bauer and Kenneth T. Raczewski hereby submit the following materials in support of the proposed Class Action Settlement:

AFFIDAVIT OF JUSTIN R HUGHES REGARDING

- (A) MAILING OF THE NOTICE AND PROOF OF CLAIM FORM;
- (B) PUBLICATION OF THE SUMMARY NOTICE;
- (C) ESTABLISHMENT OF THE TELEPHONE HOTLINE;
- (D) ESTABLISHMENT OF THE SETTLEMENT WEBSITE;
- (E) KCC REQUEST FOR FEES AND EXPENSES; AND
- (F) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE

Respectfully submitted this 11th day of May, 2020.

/s/ David A. Bain

David A. Bain (Georgia Bar No. 032449)
LAW OFFICES OF DAVID A. BAIN, LLC
1230 Peachtree Street, NE
Suite 1050
Atlanta, GA 30309
Telephone: (404) 724-9990
Facsimile: (404) 724-9986
E-mail: dbain@bain-law.com

Liaison Counsel for the Plaintiff Class

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

William C. Fredericks (admitted *pro hac vice*)

Anjali Bhat (admitted *pro hac vice*)

230 Park Avenue, 17th Floor

New York, NY 10169

Telephone: (212) 223-6444

Facsimile: (212) 223-6334

Email: wfredericks@scott-scott.com

abhat@scott-scott.com

-and-

LEVI & KORSINSKY, LLP

Shannon L. Hopkins (admitted *pro hac vice*)

Sebastiano Tornatore

733 Summer Street

Stamford, CT 06901

Telephone: (203) 992-4523

Email: shopkins@zlk.com

stornatore@zlk.com

Co-Lead Counsel for the Plaintiff Class

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing NOTICE OF FILING HUGHES AFFIDAVIT be filed with the Clerk of Court through the Odyssey eFileGA system and served a true and correct copy of the same by electronic mail upon the following:

Michael R. Smith
Ben Lee
KING & SPALDING LLP
1180 Peachtree Street, NE
Atlanta, GA 30309
mrsmith@kslaw.com
blee@kslaw.com

John R. Bielema
Michael P. Carey
Bryan Cave, LLP
1201 West Peachtree Street N.W.
One Atlantic Center, Fourteenth Floor
Atlanta, GA 30309
john.bielema@bclplaw.com
michael.carey@bclplaw.com

This 11th day of May, 2020.

/s/ David A. Bain
David A. Bain

Counsel for the Plaintiff Class

**IN THE SUPERIOR COURT OF FULTON COUNTY
BUSINESS CASE DIVISION
STATE OF GEORGIA**

IN RE ENDOCHOICE HOLDINGS, INC.
SECURITIES LITIGATION

Civil Action File No. 2016 CV 277772

(Consolidated with Civil Action No.
2016 CV 281193)

CLASS ACTION

**AFFIDAVIT OF JUSTIN R HUGHES REGARDING
(A) MAILING OF THE NOTICE AND PROOF OF CLAIM FORM;
(B) PUBLICATION OF THE SUMMARY NOTICE;
(C) ESTABLISHMENT OF THE TELEPHONE HOTLINE;
(D) ESTABLISHMENT OF THE SETTLEMENT WEBSITE;
(E) KCC REQUEST FOR FEES AND EXPENSES; AND
(F) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, Justin R. Hughes, declare and state as follows:

1. I am a Vice President of Class Actions at Kurtzman Carson Consultants LLC (“KCC”). Pursuant to the Court’s February 11, 2020 Order Preliminarily Approving Class Action Settlement and Providing for Issuance of Notice (the “Preliminary Approval Order”), KCC was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned Action.¹ I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

MAILING OF THE NOTICE PACKET

2. Pursuant to the Preliminary Approval Order, KCC is responsible for disseminating the Notice of Proposed Class Action Settlement (the “Notice”) and the Proof of Claim and Release (the “Claim Form” and, collectively with the Notice, the “Notice Packet”) to potential Class Members. A copy of the Notice Packet is attached hereto as Exhibit A.

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement, dated January 30, 2020 (the “Stipulation”) and/or the Preliminary Approval Order.

3. In accordance with the Stipulation and Preliminary Approval Order, KCC received from Counsel for EndoChoice Defendants a list containing the names and addresses of 121 persons or entities who purchased EndoChoice Holdings, Inc. (“EndoChoice”) common stock during the period from June 4, 2015 through and including August 3, 2016 (the “Relevant Period”). In addition, KCC received from Counsel for Underwriter Defendants lists containing the names and addresses of 2,994 persons or entities who purchased Initial Public Offering (“IPO”) shares directly from the Underwriter Defendants. On March 2, 2020, KCC disseminated Notice Packets by first-class mail to the 3,115 potential Class Members contained on the provided lists.

4. As in most class actions of this nature, a large majority of potential Class Members are beneficial purchasers whose securities were held in “street name” – i.e., the securities were purchased by brokerage firms, banks, institutions and other third-party nominees in the name of the nominee, on behalf of the beneficial purchasers. KCC maintains a proprietary database with the names and addresses of the largest and most common U.S. banks, brokerage firms, and nominees, including national and regional offices of certain nominees (the “Nominee Database”). KCC’s Nominee Database is updated from time to time as new nominees are identified, and others merge or cease to exist. At the time of the initial mailing, the Nominee Database contained 956 mailing records. On March 2, 2020, KCC caused Notice Packets to be mailed to the 956 mailing records contained in KCC’s Nominee Database.

5. The Notice directed those who purchased or otherwise acquired shares of EndoChoice during the Relevant Period, for the beneficial interest of persons or organizations other than themselves, to provide KCC with the name and last known address of each person or entity for whom the Nominee executed such transactions. KCC then caused the Notice Packet to be mailed promptly to said beneficial owners. Alternatively, Nominees were also advised that they

could request additional copies of the Notice Packet from KCC, in which case they were directed to promptly mail the Notice Packet directly to the persons for whom the transactions were made.

6. Following the initial mailing, through May 7, 2020, KCC has received an additional 1,698 unique names and addresses of potential Class Members from individuals or nominees requesting that a Notice Packet be mailed to such persons or entities. Additionally, KCC has received requests from nominees for an additional 3,775 unaddressed Notice Packets to be forwarded by the nominees to their customers. All such requests have been honored in a timely manner, and KCC will continue to disseminate Notice Packets upon receipt of any additional requests and/or upon receipt of updated addresses.

7. As a result of the efforts described above, as of May 7, 2020, KCC has mailed a total of 9,600 Notice Packets to potential Class Members and nominees.²

PUBLICATION OF THE SUMMARY NOTICE

8. Pursuant to the Preliminary Approval Order, on March 9, 2020, KCC caused the Summary Notice to be published in Investor's Business Daily and to be transmitted over PR Newswire. Attached hereto as Exhibit B are confirmations of publication and transmittal.

TELEPHONE HOTLINE

9. KCC established and continues to maintain a toll-free telephone number (1-866-610-7723) for potential Class Members to call and obtain information about the Settlement, request a Notice Packet, and/or seek assistance from a live operator during regular business hours. The telephone hotline became operational on March 2, 2020.

SETTLEMENT WEBSITE

10. To further assist potential Class Members, KCC, in coordination with Class

² This figure includes 56 Notice Packets that were initially returned as undeliverable by the United States Postal Service, but re-mailed based on updated addresses provided by the United States Postal Service or obtained through a third-party vendor.

Counsel, designed, implemented and currently maintains a website, www.EndoChoiceSecuritiesLitigation.com, dedicated to the Settlement (the “Settlement Website”). The address for the Settlement Website is set forth in the Notice, Claim Form and Summary Notice. The Settlement Website became operational on March 2, 2020. The Settlement Website lists the exclusion, objection, and claim submission deadlines, as well as the date and time of the Court’s Settlement Fairness Hearing. In addition, the Settlement Website contains links to copies of the Stipulation, the Preliminary Approval Order, and the Notice Packet, all of which can be downloaded by potential Class Members. The Settlement Website also contains detailed instructions for entities who wish to submit claims electronically. KCC will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of the administration.

KCC’S REQUESTED FEES AND EXPENSES

11. KCC agreed to be the Claims Administrator in exchange for payment of its fees and expenses. Attached hereto as Exhibit C is a copy of KCC’s invoice for services already performed in the amount of \$21,189.69. Pursuant to ¶14 of the Stipulation, “Prior to the Effective Date, and without further order of the Court, up to \$250,000 of the Settlement Fund may be used by Class Counsel to pay, from the Escrow Account, reasonable Notice and Administration Expenses actually incurred.” KCC respectfully submits that the fees and expenses are accurately reflected on the invoice, and are substantially *less* than the pre-approved Notice costs provided for in the Stipulation – and that the requested interim payment of \$21,189.69 to KCC should therefore be approved.

REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE

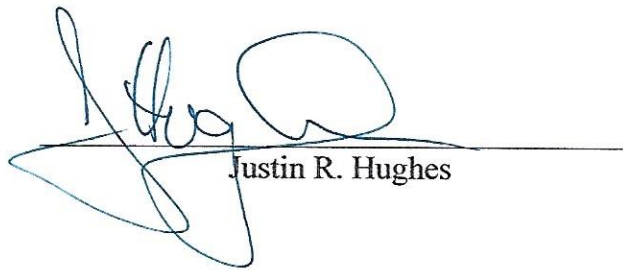
12. The Notice also informs potential Class Members that requests for exclusion (or “opt-out requests”) from the Class must be addressed to EndoChoice Securities Litigation,

EXCLUSIONS, c/o KCC Class Action Services, 3301 Kerner Boulevard, San Rafael, CA 94901, such that they are received no later than May 25, 2020. The Notice also sets forth the information that must be included in each request for exclusion. As of May 7, 2020, KCC can confirm that it has not received any exclusion requests to date. KCC will submit a supplemental affidavit after the May 25, 2020 deadline that will report on all exclusion requests received.

13. Although the Notice advised that Class Members were to send any objections (as opposed to opt-out requests) to counsel and to the Clerk of the Court, sometimes Class Members will also mistakenly send objections to the claims administrator in a case. Here, I can also confirm that KCC has not received any objections from any Class Member as of May 7, 2020.

I declare under penalty of perjury under the laws of the United States of America, California and Georgia that the foregoing is true and correct.

Executed in San Francisco, CA on May 8, 2020.



Justin R. Hughes

STATE OF CALIFORNIA)
)
COUNTY OF San Francisco)

ss:

On the 8th day of May, 2020, before me, the undersigned, a Notary Public in and for said State, appeared **JUSTIN R. HUGHES**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual executed the instrument

See attached acknowledgment
Notary Public

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Francisco)

On May 8, 2020 before me, F. Gomez, notary public
(insert name and title of the officer)

personally appeared Justin Robert Hughes
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature [Signature] (Seal)

Exhibit A

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT¹

If you purchased common stock of EndoChoice Holdings, Inc. (“EndoChoice” or the “Company”) between the 4:00 pm EDT close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive, and were damaged thereby, you could receive a payment from a class action settlement.

The Superior Court of the State of Georgia for Fulton County (the “Court”) authorized this notice.

This is not a solicitation from a lawyer.

- The proposed Settlement, if approved by the Court, will provide \$8,500,000 in cash to pay claims of eligible Class Members who purchased EndoChoice common stock on or before August 3, 2016 pursuant or traceable to the Offering Materials issued in connection with EndoChoice’s June 5, 2015 Initial Public Offering (the “IPO”).
- “Offering Materials” means the May 5, 2015 registration statement filed by EndoChoice with the SEC on Form S-1 (including the amendments thereto filed on Form S-1/A through June 3, 2015) which was declared effective after the 4:00 p.m. EDT close of U.S. trading markets on June 4, 2015, together with the final prospectus dated June 5, 2015 (the “Prospectus”) and certain other materials deemed to be incorporated therein as a matter of law.
- The Settlement resolves the consolidated class action lawsuit captioned *In re EndoChoice Holdings, Inc. Securities Litig.*, C.A. No 2016 CV 277772 (the “Action”), which alleged that EndoChoice and the other named Defendants (defined below) made material misrepresentations, and failed to disclose material facts that they were required to disclose, in the Offering Materials.
- “Defendants” refers to, collectively, (i) EndoChoice; (ii) current or former EndoChoice officers and/or directors Mark G. Gilreath, David N. Gill, R. Scott Huennekens, James R. Balkcom, Jr., J. Scott Carter, D. Scott Davis, David L. Kaufman, and Rurik G. Vandevenne (the “Individual Defendants” and, collectively with EndoChoice, the “EndoChoice Defendants”); and (iii) J.P. Morgan Securities LLC, Merrill Lynch, Fenner & Smith Incorporated, William Blair & Company, L.L.C. and Stifel, Nicolaus & Company, Incorporated (collectively, the “Underwriter Defendants”).
- The Lead Plaintiffs and Defendants disagree on whether plaintiffs, on behalf of themselves and the certified Class (as defined below) would have won at trial, and if so, the amount of damages that they could have recovered. Defendants have expressly denied and continue to deny all charges of wrongdoing or liability against them.
- 7,302,500 (7.3025 million) shares of EndoChoice common stock were issued pursuant or traceable to the Offering Materials. If valid claims are submitted for all of these 7.3025 million damaged shares, plus the roughly 1,890,000 (1.89 million) additional damaged shares representing investor short interest, the estimated distribution per damaged share will be approximately \$0.925 before deduction of Court-approved administrative costs and any attorneys’ fees and expenses awarded to Plaintiffs’ Counsel for their work on behalf of the Class.
- Plaintiffs’ Counsel, who have litigated the Action on a fully contingent basis and advanced all costs of litigation on behalf of the Class since it was filed in 2016, will submit a Fee and Expense Application asking the Court for an award of attorneys’ fees of up to one-third of the Settlement amount (or \$0.31 per damaged share), and reimbursement of their expenses of up to \$190,000 (or \$0.02 per damaged share), for their work in litigating and ultimately settling the Action, and the two Lead Plaintiffs may also apply for an award for their service to the Class not to exceed \$15,000 each. If approved, these awards will be payable and deducted from the \$8,500,000 Settlement Fund.
- The Court has not yet approved the Settlement. Payments will be made only if the Court approves the Settlement, and after any appeals are resolved. Please be patient.
- **Your legal rights are affected whether you act or don’t act. Read this Notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A PROOF OF CLAIM AND RELEASE FORM (“CLAIM FORM”) BY NO LATER THAN JUNE 30, 2020	The only way to get a payment if you have a Recognized Loss. Unless otherwise extended by the Court, properly completed Claim Forms must be postmarked on or before June 30, 2020. See Response to Question 11 below.
EXCLUDE YOURSELF FROM THE CLASS BY NO LATER THAN MAY 25, 2020	Get no payment. This is the only option that might allow you to ever be part of any other lawsuit against the Defendants and their Related Parties concerning the Released Claims at issue. See Response to Question 14 below.

¹ All capitalized terms used but not otherwise defined in the Notice have the same meaning as in the Stipulation of Settlement dated January 30, 2020 (the “Stipulation”), which can be reviewed at www.EndoChoiceSecuritiesLitigation.com.

OBJECT BY NO LATER THAN MAY 25, 2020	Write to the Court about why you do not like the Settlement, proposed Plan of Allocation, Fee and Expense Application, or any requested service award. You may, but are not required to, appear at the Settlement Hearing. See Response to Question 19 below.
GO TO A COURT HEARING ON WHETHER TO APPROVE THE SETTLEMENT AND RELATED APPLICATIONS (THE “SETTLEMENT HEARING”) ON JUNE 15, 2020 AT 10:00 A.M. EDT	You may ask to speak in Court about the fairness of the Settlement and any related applications. See Response to Questions 21-23 below.
DO NOTHING	Get no payment. Give up rights.

The Court presiding over this Action must decide whether to approve the Settlement and related applications. Payments to Class Members will be made only if the Court approves the Settlement and any appeals are resolved, and only after the Claims Administrator has finished reviewing and processing all Claim Forms. Please be patient.

Please Do Not Call the Court or Defendants with Questions About the Settlement.

For more information, you may contact Class Counsel or the Claims Administrator at:

William C. Fredericks, Esq.
SCOTT+SCOTT Attys at Law LLP
230 Park Avenue, 17th Floor
New York, NY 10169-1820
Tel: (212) 223-6444
Fax: (212) 223-6334
wfedericks@scott-scott.com

Shannon L. Hopkins, Esq.
LEVI & KORSINSKY, LLP
1111 Summer St, Suite 403
Stamford, CT 06905
Tel: (203) 992-4523
Fax: (212) 363-7171
shopkins@zlk.com

EndoChoice Securities Litigation
c/o KCC Class Action Services
PO Box 43034
Providence, RI 02940-3034
Tel: (866) 610-7723
info@EndoChoiceSecuritiesLitigation.com

WHAT THIS NOTICE CONTAINS

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BASIC INFORMATION

1. Why did I get this notice package?

You or someone in your family may have purchased EndoChoice common stock between the close of business on June 4, 2015 and August 3, 2016, pursuant or traceable to the Offering Materials issued in connection with EndoChoice's IPO. The Court directed that this Notice be sent to potential Class Members because they have a right to know about a proposed settlement of this class action lawsuit, and about their options, before the Court decides whether to approve the Settlement. If the Court approves the Settlement and any appeals are favorably resolved, the court-appointed Claims Administrator (KCC Class Action Services, LLC "KCC") will make payments to eligible Class Members that have timely submitted valid Claim Forms, in accordance with the Plan of Allocation.

The Court in charge of the case is the Superior Court of the State of Georgia, Fulton County (Business Division), and the case is *In re EndoChoice Holdings, Inc. Securities Litig.*, C.A. No. 2016 CV 277772 (the "Action").

2. What is this lawsuit about?

At all relevant times, EndoChoice designed, manufactured and marketed products used by doctors and other gastrointestinal ("GI") caregivers. Until 2013, EndoChoice's business consisted of: (1) the sale of single-use therapeutic and infection control products; and (2) GI pathology services. Beginning in January 2013, the Company began to develop and manufacture endoscopes and related imaging equipment that were marketed as parts of an endoscopy system known as "FUSE." FUSE endoscopes purportedly enabled a GI specialist to view more than twice the anatomy of a colon at any one time (as compared to competing colonoscopes) by offering a 330° view of the colon during a colonoscopy (as compared to the 140° to 170° view offered by competitors), and purportedly had the ability to detect more pre-cancerous polyps. EndoChoice began selling the first generation (Gen1) FUSE system in December 2013 and launched its second generation (Gen2) product in early 2015.

On or about June 5, 2015, pursuant to the Offering Materials, EndoChoice conducted its IPO at an IPO offering price of \$15.00 per share. EndoChoice's common stock thereafter traded on the New York Stock Exchange under the ticker symbol "GI."

The Consolidated Complaint ("Complaint"), filed December 2, 2016, alleges that the Offering Materials contained material misstatements and/or omitted material information concerning then-existing (1) defects with EndoChoice's FUSE endoscopy system; (2) deficiencies in the quality and capabilities of the Company's salesforce as of the IPO; (3) a shortage of "demo units" of the Gen2 FUSE, which were allegedly critical to the salesforce's ability to successfully market the FUSE system to prospective buyers; and (4) the inability of EndoChoice to increase the growth rate of its business, revenues and earnings. Lead Plaintiffs further allege that, as of the time of the IPO and thereafter, EndoChoice's stock price was artificially inflated, and that EndoChoice investors suffered losses as the truth about the Company's problems was eventually disclosed.

In particular, the Complaint identifies various partial corrective disclosure dates on which EndoChoice's share price fell following disclosure of adverse news about the Company. For example, on November 5, 2015, EndoChoice disclosed that sales of FUSE systems had declined in the 3rd quarter of 2015 (the first full quarter after the IPO) on a sequential basis

from the previous quarter, and that its FUSE sales force was only then (5 months after the IPO) “coming together.” Promptly after these disclosures, EndoChoice stock fell roughly 22%, from \$10.28 to \$8.01 per share. Similarly, on January 8, 2016, the Company again announced disappointing FUSE revenue and sales results, and its stock fell another 14%, from \$8.17 to \$7.03 per share. After markets closed on May 4, 2016, EndoChoice again announced disappointing FUSE sales for the 1st quarter of 2016 and plans to launch a more “reliable” third generation (“Gen3”); following these disclosures and related negative analyst commentary, EndoChoice’s common stock fell another 11% from \$5.46 to \$4.83 per share on May 5, 2016. After trading markets closed on August 3, 2016, the Company again reported disappointing FUSE results, announcing reduced earnings guidance and a \$12.6 million writedown in its valuation of certain FUSE-related assets. The next day, August 4, 2016, EndoChoice’s share price fell another 21%, closing at \$4.13 per share.

Each Lead Plaintiff filed a separate lawsuit in 2016 seeking money damages against the Defendants for their alleged violations of the Securities Act of 1933. Defendants deny all of Lead Plaintiffs’ allegations, deny that they made any false or misleading statements or otherwise did anything wrong, and deny that anything they did caused damages to Lead Plaintiffs or the Class.

3. What has happened so far in the Action?

On January 17, 2017, the EndoChoice Defendants and the Underwriter Defendants filed separate motions to dismiss the Complaint. Lead Plaintiffs filed papers opposing these motions. Following oral argument, on May 2, 2017, the Court entered an order which denied Defendants’ motions to dismiss, but also held that certain statements alleged in the Complaint to have been misleading were not actionable as a matter of law.

On May 26, 2017, Lead Plaintiffs filed their Motion for Class Certification. After four months of discovery relating to class certification (during which Defendants deposed both Lead Plaintiffs), and following full briefing and oral argument, on February 14, 2018 the Court issued an Order (the “February 2018 Order”) that (a) certified the Class (except that it narrowed the Class to include only those who purchased EndoChoice common stock pursuant or traceable to EndoChoice’s Offering Materials on or before August 3, 2016); (b) appointed the Lead Plaintiffs to serve as class representatives of the certified Class; and (c) appointed the Scott+Scott and Levi & Korsinsky firms to serve as Class Counsel. Defendants then appealed the February 2018 Order to the Georgia Court of Appeals. After further briefing and oral argument by the Parties, on June 28, 2019 the Court of Appeals issued an opinion (*see EndoChoice Holdings, Inc. v. Raczewski*, 830 S.E.2d 597 (Ga. Ct. App. 2019)) that affirmed the earlier February 2018 Order granting class certification.

In late July 2019, the Action was transferred back to the Court (from the appellate court), and the automatic stay of non-class certification related discovery that had previously been in effect was lifted. In August, Lead Plaintiffs served Defendants with their first sets of Requests for Production of Documents and Interrogatories. In September 2019, the Court entered a Case Management Order (CMO), which established deadlines for the completion of fact and expert discovery.

In August 2019, counsel for the Parties discussed whether it might be productive to engage an independent mediator to explore the possibility of negotiating a settlement. The Parties thereafter agreed in October 2019 to retain a highly experienced mediator of complex litigation and securities class actions, Robert M. Meyer, Esq., of JAMS (the “Mediator”), subject to the understanding that, unless and until any mediation process resulted in an actual agreement to settle, merits discovery under the terms of the CMO would continue and the CMO’s litigation deadlines would remain in place.

On November 27, 2019, the EndoChoice Defendants filed a motion to decertify the Class, arguing that individualized questions as to Class Members’ knowledge of the alleged misrepresentations and omissions at issue would predominate over questions common to all Class Members.

While continuing to vigorously litigate the case and various discovery matters (which included the submission of certain discovery disputes to the Court), in November and early December 2019 the Parties also prepared and exchanged detailed mediation briefs (and accompanying exhibits) that addressed both merits and damages issues. All Parties, by their counsel, then participated in a full day, arms’-length and face-to-face mediation session at JAMS’s offices in New York under the auspices of the Mediator. Although the Parties were unable to reach an agreement at the December 6, 2019 mediation session, at the end of the mediation the Mediator made a “mediator’s proposal” to settle the claims at issue for \$8.5 million in cash. Several days later, both Parties agreed (subject to approval by the Court) to resolve the Action consistent with the Mediator’s proposal. *See also* Response to Question 5 below (“Why is there a settlement?”).

4. Why is this a class action?

In a class action, one or more people called “Class Representatives” (here, Lead Plaintiffs Jesse L. Bauer and Kenneth T. Raczewski), sue on behalf of people who have similar claims. All persons with similar claims are called a “Class” or “Class Members.” Bringing a case, such as this one, as a class action allows the collective adjudication of many similar claims that might be economically too small to bring in individual actions. One court resolves the issues for all class members, except for those who exclude themselves from the class. Here, Judge Elizabeth E. Long of the Superior Court of Georgia, County of Fulton, is overseeing this Action.

5. Why is there a settlement?

The Court has not decided the claims at issue in favor of Lead Plaintiffs or Defendants. Instead, the Parties, with the assistance of the neutral third-party Mediator, have reached a negotiated settlement – based on the Mediator’s proposal after the Parties themselves had been unable to reach agreement – that both sides have agreed to. The Settlement allows both sides to avoid the risks and cost of lengthy, complex and uncertain litigation, trial, and appeals, and also permits Class Members to be compensated more quickly.

As described above, the proposed Settlement was only reached after (a) the Parties engaged in an arms’-length mediation process conducted under the auspices of the neutral and highly experienced Mediator, (b) the Parties had been unable to reach an agreement after a full-day, face-to-face mediation session, and (c) after the Mediator made a mediator’s proposal to settle the “Released Claims” (as defined in the accompanying Claim Form) against the Defendants and their Related Parties for \$8.5 million in cash. The proposed \$8.5 million Settlement reflects all Parties’ willingness to ultimately accept the independent Mediator’s settlement proposal.

After taking into account the uncertainties, risks and likely costs and expenses of further litigation in this complex securities action, Lead Plaintiffs and Class Counsel believe that the Settlement set forth herein is fair, reasonable, and in the best interests of the Class Members.

Defendants have denied and continue to deny all of the claims alleged by Lead Plaintiffs in the Action, including all charges of wrongdoing or liability arising out of any of the conduct, statements, acts or omissions alleged in the Action, but acknowledge that further litigation of the Action could prove lengthy and expensive, and, after taking into account the potential expense, burdens, and inherent uncertainties and risks of further litigation, have therefore also agreed to settle and finally resolve the Action on the terms set forth in the Stipulation.

WHO IS PART OF THE SETTLEMENT?

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

The Court previously certified the following Class: “All Persons who purchased shares of EndoChoice common stock pursuant or traceable to EndoChoice’s [IPO] Offering Materials on or before August 3, 2016, and who were damaged thereby.”

7. Are there exceptions to being included?

Yes. Excluded from the Class are Defendants; the past and current officers and directors of EndoChoice and the Underwriter Defendants; the legal representatives, parents, subsidiaries, heirs, immediate family members, successors and assigns of any excluded Person; and any entity in which any of the above excluded Persons has or had a controlling equity interest. Also excluded will be any Person that validly requests exclusion from the Class in accordance with the Court-approved procedures set forth in the Response to Question 14 below.

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

If you are still not sure whether you are included, you can ask for free help. You can contact the Claims Administrator by writing to the address provided on page 2 above for more information.

WHAT ARE THE SETTLEMENT BENEFITS?

9. What does the Settlement provide?

EndoChoice has agreed to pay or cause to be paid \$8.5 million in cash (the “Settlement Fund”) on behalf of all Defendants. The Settlement Fund, plus interest earned from the date it is established, less costs, fees, and expenses (the “Net Settlement Fund”), will be divided among all “Authorized Claimants” (namely, those eligible Class Members who timely submit valid Proof of Claim and Release forms (“Claim Forms”). See *also* Response to Question 11 below. Costs, fees, and expenses include Court-approved attorneys’ fees and expenses; any service awards, certain Notice and Administration Costs (including the costs of printing and mailing this Notice and the costs of claims administration); and Taxes on any interest earned by the Settlement Fund.

In return, if the Settlement is approved and becomes effective, Lead Plaintiffs will dismiss the Action, and all Class Members who have not excluded themselves from the Class will be deemed to have released, relinquished and discharged all Released Claims against the Defendants and their Related Parties (collectively, the “Released Defendants’ Parties”), whether or not these Class Members execute and submit Claim Forms. See *also* Response to Question 13 below.

10. How much will my payment be?

If you are entitled to a payment, your share of the Net Settlement Fund will depend on the number of Authorized Claimants. Payments will be calculated on a *pro rata* basis, meaning that the Net Settlement Fund will be divided among the Authorized Claimants and distributed accordingly. You will not receive a payment, however, if your proportionate share of the Net Settlement Fund is less than \$10.00. Distributions will not be made until after (a) the deadline for submission of Claim Forms

has passed, and (b) the Claims Administrator has finished the process of processing, reviewing and verifying the validity of all Claim Forms received.

If there is any balance remaining in the Net Settlement Fund after six months from the date of the initial distribution of the Net Settlement Fund, Class Counsel shall, if reasonably feasible, after paying any outstanding administrative fees or expenses, reallocate such balance among Authorized Claimants in an equitable and economic fashion. Thereafter, any remaining balance shall be donated to a §501(c)(3) non-profit organization approved by the Court.

You can calculate your Recognized Claim in accordance with the formula shown below in the Plan of Allocation. The payment you receive will reflect your Recognized Claim in relation to the Recognized Claims of all persons submitting valid Claim Forms. Because the total of all Recognized Claims is expected to exceed the amount of the Net Settlement Fund, your Recognized Claim is *not* the amount of the payment that you can expect, but will (together with all other Class Members' Recognized Claim amounts) be used to calculate your (and each other eligible Authorized Claimant's) *pro rata* share of the Net Settlement Fund.

11. How can I get a payment?

To qualify for a payment, you must be an eligible Class Member and send in a valid and timely Proof of Claim and Release form ("Claim Form"). You may download a Claim Form from the Settlement website, www.EndoChoiceSecuritiesLitigation.com or request one from the Claims Administrator by calling (866) 610-7723. Read the instructions carefully, fill out the Claim Form, include *copies* of all requested documents, sign the form, and then mail it so it is postmarked no later than June 30, 2020 to: EndoChoice Securities Litigation, P.O. Box 43034, Providence, RI 02940-3034. Any Class Member who fails to submit a Proof of Claim and Release form by the June 30, 2020 deadline shall be forever barred from receiving any distribution from the Net Settlement Fund (absent contrary order of the Court), but otherwise shall be bound by all of the terms of the Stipulation and the Judgment, including the releases therein, and will be permanently barred and enjoined from asserting any of the Released Claims against any of the Released Defendants' Parties.

12. When would I get my payment?

The Court will hold a hearing on June 15, 2020 at 10:00 a.m. EDT, to decide whether to approve the Settlement and rule on related applications. If the Settlement is approved, the Claims Administrator will complete the administration process and determine how much each Authorized Claimant is entitled to receive. After the Claims Administration process is complete, Class Counsel will then seek permission from the Court to distribute the Net Settlement Fund on a *pro rata* basis to Authorized Claimants in accordance with the Plan of Allocation. This is necessarily a long process. Please be patient.

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

Unless you timely and validly exclude yourself from the Class by the May 25, 2020 deadline, if you fit within the definition of the Class you will continue to be a Class Member, which means that you cannot sue, continue to sue, or be part of any other lawsuit that brings any of the Released Claims (including the claims asserted in this Action) against any of the Defendants or the other Released Defendants' Parties (as defined below). It also means that you will be bound by all of the Court's orders in the Action. If you remain a Class Member, and if the Settlement is approved, you and each of your "Related Parties" (as defined below) will give up all "Released Claims" (as defined below), including "Unknown Claims" (as defined below), that you may have against the "Released Defendants' Parties" (as defined below):

- "Released Claims" means all claims (including Unknown Claims), demands, rights and causes of action of any kind that have been or could have been asserted in the Action, or could in the future be asserted in any forum, whether arising under federal, state, common, statutory, or foreign law, or any other rule or regulation, by any Lead Plaintiff, any Class Member, or any of their Related Parties against any Released Defendants' Party, which both (a) arise out of or relate in any way to any of the allegations, acts, transactions, facts, events, matters, occurrences, statements, representations or omissions set forth, alleged or referred to in the Action, or which could have been alleged in the Action; and (b) arise out of or relate to the purchase, acquisition, holding, disposition or sale of any shares of EndoChoice common stock issued in or pursuant to the IPO. Notwithstanding the foregoing, "Released Claims" does not, however, include any claims to enforce the Settlement.
- "Released Defendants' Parties" (each a "Released Defendant Party") means each Defendant and each of their respective Related Parties.
- "Related Parties", when used in reference to a Person, refers to and includes (i) the Person; (ii) for natural persons, each of that Person's respective immediate family members and any trust of which the Person is the settlor or which is for the benefit of any such Person and/or member of his or her family, and, for non-natural persons, each of their direct or indirect parents or subsidiaries, and (iii) for any of the persons listed in sub-parts (i) or (ii) of this definition, their respective past, present, and future general partners, limited partners, principals, controlling shareholders, joint venturers, members, officers, directors, managers, managing directors, employees, contractors, consultants, auditors, accountants, financial advisors, professional advisors, investment bankers, legal representatives, insurers, trustees,

trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof, in their capacities as such, and any entity in which any such Person has a controlling interest.

- “Unknown Claims” [with respect to the Released Claims] means any and all Released Claims of every nature and description against the Released Defendants’ Parties which any Lead Plaintiff or any Class Member does not know or suspect to exist in his, her or its favor at the time of their release of the Released Claims, and including without limitation those which, if known by such Lead Plaintiff or Class Member, might have affected his, her or its decisions with respect to the Settlement or the releases. With respect to any and all Released Claims, the Parties agree that, upon the Effective Date, Lead Plaintiffs shall expressly waive, and each Class Member shall be deemed to have waived, and by operation of the Judgment shall have waived, any and all rights and benefits conferred by any law of any state or territory of the United States, or any principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542, which provides that “A general release does not extend to claims which the creditor does not know or suspect to exist in his or her favor at the time of executing the release, which if known by him or her must have materially affected his or her 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 Defendants or any Released Defendant Party on your own about the Released Claims, then you must take steps to exclude yourself—or as it is sometimes referred to, you must “opt out” of the Class.

14. How do I exclude myself (“Opt Out”) from the proposed Settlement?

To exclude yourself from the Class, you must send a letter by first class mail stating that you “request exclusion from the Class in *In re EndoChoice Holdings Securities Litigation*, C.A. No. 2016 CV 277772.” Your exclusion request must also legibly state the date(s), price(s) and number(s) of shares of all your purchases, acquisitions and sales of EndoChoice common stock between the 4:00 p.m. EDT close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive, and append *copies* of supporting documentation (*i.e.*, brokerage account statements). You must also include your name, mailing address, daytime telephone number, email address and your signature. Unless the deadline is otherwise extended by the Court, your request for exclusion must be received **no later than May 25, 2020** by:

EndoChoice Securities Litigation
EXCLUSIONS
c/o KCC Class Action Services
3301 Kerner Boulevard
San Rafael, CA 94901

You cannot exclude yourself by telephone, by fax or by email. If you ask to be excluded, you will not receive any payment or other benefit from the Settlement, and you cannot object to the Settlement.

15. If I do not exclude myself, can I sue EndoChoice, Defendants or the other Released Defendants’ Parties later for the Released Claims?

No. Unless you exclude yourself, you give up any rights to sue Defendants and the other Released Defendants’ Parties, or to enforce any existing judgments against any of the Released Defendants’ Parties, for any and all Released Claims. If you have a pending lawsuit against Defendants or the other Released Defendants’ Parties, speak to your lawyer in that case immediately to determine if you have to exclude yourself from *this* Class to continue your own lawsuit. Remember, the deadline for exclusion requests to be **received** is May 25, 2020.

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

No. If you exclude yourself, do not send in a Proof of Claim and Release form to ask for any money.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court appointed the law firms of Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP to represent all Class Members. These lawyers are called “Class 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.

18. How will the lawyers be paid?

Class Counsel will ask the Court to award attorneys’ fees from the Settlement Fund in an amount not to exceed one third (33⅓%) of the Settlement Fund, and for reimbursement of their expenses in an amount not to exceed \$190,000, plus interest on such fees and expenses at the same rate as may be earned by the Settlement Fund.

The attorneys’ fees and expenses requested will be the only payment that Class Counsel will receive for their efforts in achieving the Settlement and for the substantial risk they assumed in undertaking to represent the Class in this matter on a

wholly contingent basis. To date, Class Counsel has not been paid anything for their services in litigating this Action since 2016 on behalf of Lead Plaintiffs and the Class, nor have they received any reimbursement for the substantial out-of-pocket expenses that they have advanced. The fees and expenses requested will compensate Class Counsel for their work in obtaining the Settlement Fund for the Class. In addition, each of the two Lead Plaintiffs may apply for a service award not to exceed \$15,000 for their service in representing the Class. The Court may, however, award less than these requested amounts, in which case the difference will remain in the Settlement Fund.

OBJECTING TO THE SETTLEMENT

19. 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 proposed Plan of Allocation, the application by Class Counsel for an award of fees and reimbursement of expenses, or the application for a service award to Lead Plaintiffs. Copies of the motions in support of the Settlement and Plaintiffs' Fee and Expense Application will be filed no later than May 11, 2020 and will thereafter be available for review on the Settlement website at www.EndoChoiceSecuritiesLitigation.com. You may give reasons why you think the Court should not approve any or all of the settlement terms or related applications, and you may submit any documentation and authorities that you believe are appropriate. However, the Court will only consider your views if you file and mail a proper objection within the deadline identified and according to the following procedures.

To object, you must file a written objection (together with any papers or briefs in support of the objection) with the Clerk of the Superior Court of the State of Georgia for Fulton County, Business Case Division at the address listed below **on or before May 25, 2020**. Your objection must state that you object to the proposed Settlement (or a related application) in *In re EndoChoice Holdings Securities Litigation*, C.A. No. 2016 CV 277772. You must include your name, mailing address, daytime phone number, email address and signature. In addition, your objection must be accompanied by *copies* of documents showing the date(s), price(s) and number(s) of shares of all purchases and sales of EndoChoice common stock between the close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive. Your objection must also state any reasons for your objection(s), and attach copies of any evidence that you wish the Court to consider. In addition to filing your objection with the Court, your objection must be mailed or delivered such that it is **received** by Class Counsel and counsel for the EndoChoice Defendants, at the addresses listed below, **on or before May 25, 2020**:

<u>The Court</u>	<u>Class Counsel</u>
Clerk of Superior Court of Fulton Co., Business Division Attn: <i>In re EndoChoice Litig.</i> C.A. No. 2016 CV 277772 136 Pryor Street, S.W. Atlanta, Georgia 30303 Tel: (404) 612-4570	William C. Fredericks, Esq. SCOTT+SCOTT ATTYS AT LAW LLP 230 Park Avenue, 17th Floor New York, NY 10169-1820 Tel: (212) 223-6444 wfredericks@scott-scott.com
<u>EndoChoice Defendants' Counsel</u>	
Michael R. Smith, Esq. Benjamin Lee, Esq. King & Spalding LLP 1180 Peachtree Street, NE Suite 1600 Atlanta, GA 30309-3521	

If you wish to speak in support of your objection at the Settlement Hearing (see Response to Question 23 below), you must also state in your written objection that you intend to do so.

20. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you do not like something about the proposed Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you cannot object to the Settlement.

THE COURT'S SETTLEMENT HEARING

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

The Court will hold a Settlement Hearing at 10:00 a.m. EDT on June 15, 2020, before the Hon. Elizabeth E. Long in Courtroom 9J, of the Georgia Superior Court, Fulton County, Business Division, at 136 Pryor Street, S.W., 9th Floor, Atlanta, Georgia. At this hearing, the Court will consider whether the Settlement and the proposed Plan of Allocation are fair, reasonable and adequate. At this hearing, the Court will also consider Plaintiffs' Counsel's Fee and Expense Application and Lead Plaintiffs' application for a service award. The Court will take into consideration any written objections and will listen to Class Members who have submitted written requests to speak at the hearing. The Court may change the date and

time of the Settlement Hearing without notice. Please check the Settlement website and also call or email Class Counsel before coming to be sure that the date and/or time of the Settlement Hearing has not changed.

22. Do I have to come to the Settlement Hearing?

No. Class Counsel will answer questions the Court may have, but you are welcome to come at your own expense. If you send a written objection, you do not have to come to Court to talk about it. As long as you submitted it on time, the Court will consider it. You may also pay your own lawyer to attend, but attendance is not mandatory. Class Members do not need to appear at the Settlement Hearing or take any other action to indicate their approval.

23. May I speak at the Settlement Hearing?

If you object to the Settlement, you may ask the Court for permission to speak at the Settlement Hearing by including in your written objection a statement that you “Intend to appear in *In re EndoChoice Holdings, Inc. Securities Litigation*, C.A. No. 2016 CV 277772.” Class Members who object to the Settlement, the Plan of Allocation, Plaintiffs’ Counsel’s Fee and Expense Application or Lead Plaintiffs’ request for a service award, and who wish to present evidence at the Settlement Hearing, must identify in their written objections any witnesses they propose to call to testify and include copies of any exhibits they intend to offer into evidence at the Settlement Hearing. You cannot speak at the Hearing if you exclude yourself from the Class or if you do not provide written notice of your intention to speak at the Hearing so that it is received by the May 25, 2020 deadline.

IF YOU DO NOTHING

24. What happens if I do nothing at all?

If you do nothing, you will get no money from the Settlement and you will not be able to start a lawsuit, continue with a lawsuit or be part of another lawsuit against Defendants or the Released Defendants’ Parties that asserts any of the claims being released in the Settlement. Class Members who do not submit valid and timely Claim Forms shall be barred from receiving any payments from the Settlement, but will in all other respects be subject to and bound by the terms of the Stipulation and any Judgment entered, including the releases set forth therein.

GETTING MORE INFORMATION

25. Are there more details about the proposed Settlement?

This Notice summarizes the proposed Settlement. More details are in the Stipulation. You may review and download a copy of the Stipulation (and other documents relating to the Action) at the settlement website, www.EndoChoiceSecuritiesLitigation.com. You may also request a copy of the Stipulation and additional Claim Forms from the Claims Administrator by phone, email or mail using the contact information provided on page 2, above. A complete set of the pleadings and other court filings in the Action are also available for inspection during regular business hours at the Office of the Clerk for the Metro Atlanta Business Case Division, Fulton County Courthouse, 136 Pryor Street, S.W., Suite C-956, Atlanta, Georgia 30303. You may also contact Class Counsel, listed above on page 2, with any questions.

***PLEASE DO NOT TELEPHONE THE COURT, DEFENDANTS,
OR DEFENDANTS’ COUNSEL REGARDING THIS NOTICE.***

PROPOSED PLAN OF ALLOCATION OF NET SETTLEMENT FUND AMONG CLASS MEMBERS

The Net Settlement Fund, subject to approval by the Court, shall be distributed to Class Members who timely submit valid Claim Forms (“Authorized Claimants”) pursuant to the proposed Plan of Allocation set forth below.

Class Members who purchased publicly tradable shares of EndoChoice’s common stock (ticker symbol: “GI”) that were issued pursuant to EndoChoice’s IPO Offering Materials between (a) 4:00 p.m. E.D.T. on **June 4, 2015** (when the registration statement for the IPO was declared “effective”) and **August 3, 2016**, inclusive (collectively, the “Eligible Shares”) are potentially eligible for damages under the 1933 Securities Act based on their Recognized Losses and resulting total value of their Recognized Claim (as a percentage of the total of all Recognized Claims of all Authorized Claimants), as set forth below. The total number of damaged Eligible Shares is estimated to be no more than 9.2 million. No Recognized Losses shall be recognized on any sales of Eligible Shares that took place on or before September 17, 2015 due to loss limitation rules under the 1933 Act, because such shares would have been sold prior to the date when they first traded for less than the \$15 per share IPO price.

A. Calculation of Recognized Losses on Eligible Shares Purchased On or Before December 2, 2015

For each Eligible Share purchased on or before December 2, 2015, the Recognized Loss for each such share shall be (i) the Inflation per Share on the Class Member’s date of purchase (“Date of Purchase”), minus (ii) the Inflation per Share on the date the Class Member sold such share (the “Date of Sale”), as set forth in Table A below (unless a lower Recognized Loss amount would result by applying the loss limitation rules (caps) set forth at ¶¶A.1-3 below, in which case the lower amount will apply).

Table A: Inflation per Share on Eligible Shares Purchased On or Before December 2, 2015²

Period	Begin Date	End Date	Inflation per Share
1	June 4, 2015	September 17, 2015	\$6.35
2	September 18, 2015	September 27, 2015	\$5.99
3	September 28, 2015	September 29, 2015	\$5.53
4	September 30, 2015	October 19, 2015	\$5.26
5	October 20, 2015	November 4, 2015	\$4.99
6	November 5, 2015	November 5, 2015	\$2.71
7	November 6, 2015	January 7, 2016	\$3.29
8	January 8, 2016	May 3, 2016	\$2.29
9	May 4, 2016	May 4, 2016	\$2.04
10	May 5, 2016	May 11, 2016	\$1.73
11	May 12, 2016	July 13, 2016	\$1.46
12	July 14, 2016	July 17, 2016	\$1.29
13	July 18, 2016	August 3, 2016	\$1.14
14	August 4, 2016	Current	\$0.00

1. If sold prior to July 18, 2016, the Recognized Loss for each such Eligible Share will be limited (capped) by the difference between (a) the lesser of (i) the share's purchase price or (ii) \$15.00 (the IPO price) and (b) the share's sale price.
2. If sold on or after July 18, 2016 and prior to September 28, 2016, the Recognized Loss for each such Eligible Share will be limited (capped) by the difference between (a) the share's purchase price and (b) the greater of (i) the share's sales price or (ii) \$4.95 (EndoChoice's closing price on July 18, 2016, when first complaint in the Action was filed).
3. If not sold prior to September 28, 2016, then the Recognized Loss for each such Eligible Share will be limited (capped) by the difference between (a) the share's purchase price and (b) \$8.00 (the tender offer price announced by Boston Scientific on September 28, 2016).

B. Calculation of Recognized Losses on Eligible Shares Purchased After December 2, 2015 and before August 4, 2016

For each Eligible Share purchased after December 2, 2015 and before August 4, 2016, the Recognized Loss on each such share shall be (a) the Inflation per Share on the Date of Purchase, minus (b) the Inflation per Share on the Date of Sale, as set forth in Table B below (unless a lower Recognized Loss amount would result by applying the loss limitation rules (caps) set forth at ¶¶B.1-3 below, in which case the lower amount will apply).

² The Inflation per Share values are based on an event study performed by Plaintiffs' expert, which sought to estimate the extent to which the value of Eligible Shares of EndoChoice was inflated during relevant periods due to Defendants' alleged failure to adequately disclose information as alleged in the Complaint. The price declines observed on September 18, 28 and 30, 2015, and on October 20, 2015, were deemed to be due largely to leakage of adverse information (and resulting reduction in price inflation) which anticipated that EndoChoice would report disappointing financial results for the third quarter of 2015 (which in fact occurred when EndoChoice eventually reported those results after 4 p.m. on November 4, 2015). The Plan of Allocation discounts the net price declines observed on these four dates by 50% to reflect the risk that the price declines on these dates could ultimately be attributed to factors unrelated to any omissions of material information from the Offering Materials as alleged in the Complaint.

Table B: Inflation per Share on Eligible Shares Purchased On or Between December 3, 2015 and August 3, 2016³

Period	Begin Date	End Date	Inflation per Share
7	December 3, 2015	January 7, 2016	\$0.16
8	January 8, 2016	May 3, 2016	\$0.11
9	May 4, 2016	May 4, 2016	\$0.10
10	May 5, 2016	May 11, 2016	\$0.09
11	May 12, 2016	July 13, 2016	\$0.07
12	July 14, 2016	July 17, 2016	\$0.06
13	July 18, 2016	August 3, 2016	\$0.06
14	August 4, 2016	Current	\$0.00

1. If sold prior to July 18, 2016, the Recognized Loss for each such Eligible Share will be limited (capped) by the difference between (a) the price per share on the Date of Purchase and (b) the sales price per share.
2. If sold on or after July 18, 2016 and prior to September 28, 2016, the Recognized Loss for each such Eligible Share will be limited by the difference between (a) the share's purchase price and (b) the greater of (i) the share's sales price or (ii) \$4.95 (the closing price on July 18, 2016, when the first complaint in the Action was filed).
3. If not sold prior to September 28, 2016, then the Recognized Loss for each such Eligible Share will be limited by the difference between (a) the share's purchase price and (b) \$8.00 (the tender offer price announced by Boston Scientific on September 28, 2016).

C. Additional Provisions Relating to The Calculation of Recognized Losses

For Class Members who made multiple purchases, acquisitions, or sales during the period between (a) 4:00 p.m. on **June 4, 2015** (when the registration statement for the IPO was declared "effective") and **August 3, 2016**, inclusive (the "Relevant Period"), the First-In, First-Out ("FIFO") method will be applied to such purchases, acquisitions, and sales for purposes of calculating Recognized Claims or Losses. Under the FIFO method, any sales of EndoChoice common stock made after the IPO will be matched, in chronological order, starting with shares of common stock purchased in the IPO.

The Date of Purchase or Date of Sale is deemed to be the "contract" or "trade" date, as distinguished from the "settlement" date. All purchase, acquisition, and sale prices shall exclude any fees and commissions. The receipt or grant by gift, devise or operation of law of EndoChoice common stock shall not be deemed a purchase or sale of EndoChoice common stock for purposes of calculating any claimant's Recognized Claim or Loss, nor shall it be deemed an assignment of any claim relating to the purchase of such shares unless specifically provided in the instrument of gift or assignment.

Gains on short sales of EndoChoice shares (if any) made on or between June 5, 2015, and August 3, 2016, will be used to offset losses. The date of covering a "short sale" is deemed to be the date of purchase of the EndoChoice common stock. The date of a "short sale" is deemed to be the date of sale of the EndoChoice common stock. Under the Plan of Allocation, however, the Recognized Loss on "short sales" is zero.

Option contracts are not securities eligible to participate in the Settlement. With respect to EndoChoice common stock purchased or sold through the exercise of an option, the purchase/sale date of the EndoChoice common stock is the exercise date of the option and the purchase/sale price of the EndoChoice common stock is the exercise price of the option.

D. Allocation of Net Settlement Proceeds Based on Recognized Losses

Under the Plan of Allocation, the amount of the "Recognized Claim" for each Class Member who submits a timely and valid Proof of Claim (each a "Claimant") shall be (a) the sum of his, her or its Recognized Loss amounts for their Eligible Shares, as determined in accordance with §§ A-C above.

The Net Settlement Fund will be distributed to Class Members whose claims are found to be valid and are accepted ("Authorized Claimants") on a *pro rata* basis based on the relative size of their Recognized Claims. Specifically, a "Distribution Amount" will be calculated for each Authorized Claimant, which shall be calculated by multiplying (a) the Authorized Claimant's Recognized Claim divided by the aggregate total of all Recognized Claims of all Authorized Claimants, by (b) the total amount in the Net Settlement Fund. If any Authorized Claimant's Distribution Amount calculates to less than \$10.00, however, no distribution will be made to such Authorized Claimant.

A Class Member will be eligible to receive a distribution from the Net Settlement Fund only if a Class Member had a net overall loss, after all profits from transactions in all EndoChoice common stock described above during the Relevant Period

³ Certain *non*-IPO issued shares of Endochoice common stock (that were not issued in or "traceable" to the IPO) became eligible to trade on December 3, 2015 upon expiry of certain "lock-up" agreements that had been entered into at the time of the IPO. Because of the difficulties of establishing that shares purchased after December 2, 2015 can be traced to shares issued pursuant to the IPO Offering Materials (as required to be eligible for damages under the relevant provisions of the Securities Act), the Inflation per Share values for shares purchased on or after December 3, 2015 are discounted by approximately 95% relative to the comparable Inflation per Share values for shares purchased on or before that date.

are subtracted from all losses. To the extent a Claimant had a market gain with respect to his, her, or its overall transactions in EndoChoice common stock during the Relevant Period, the value of the Claimant's Recognized Claim shall be zero. Such Claimants shall in any event be bound by the Settlement. To the extent that a Claimant suffered an overall market loss with respect to his, her, or its overall transactions in EndoChoice common stock during the Relevant Period, but that market loss was less than the total Recognized Claim calculated above, then the Claimant's Recognized Claim shall be limited to the amount of the actual market loss.

For purposes of determining whether a Claimant had a market gain with respect to his, her, or its overall transactions in EndoChoice common stock during the Relevant Period or suffered a market loss, the Claims Administrator shall determine the difference between (i) the "Total Purchase Amount"⁴ and (ii) the sum of the "Total Sales Proceeds"⁵ (for shares sold during the Relevant Period) and (for shares not sold but still held as of the end of the Relevant Period) the "Holding Value"⁶. This difference shall be deemed a Claimant's market gain or loss with respect to his, her, or its overall transactions in EndoChoice common stock during the Relevant Period.

The Net Settlement Fund will not be distributed unless and until the Court has approved the Settlement and this or a modified Plan of Allocation, and the time for any petition for rehearing, appeal or review, whether by certiorari or otherwise, has expired. Approval of the Settlement is separate from approval of a plan of allocation. Any determination with respect to a plan of allocation will not affect the Settlement, if approved.

Each Claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to his, her or its Claim Form. Payment pursuant to the Plan of Allocation set forth above (or as may be modified by the Court) shall be conclusive against all Authorized Claimants.

You should contact the Claims Administrator or Class Counsel if you disagree with any determinations that may be made by the Claims Administrator regarding your Claim Form. If you are unsatisfied with the determinations, you may ask the Court, which retains jurisdiction over all Class Members and the claims administration process, to decide the issue by submitting a written request. Distributions will be made to Authorized Claimants after all claims have been processed and after the Court has finally approved the Settlement.

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

The Court has ordered that if you held any EndoChoice common stock purchased or acquired between the 4:00 p.m. EDT close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive, as nominee for a beneficial owner, then, within twenty (20) days after you receive this Notice, you must either: (1) send a copy of this Notice and accompanying Claim Form ("the Notice Package") by first class mail to all such beneficial owners; or (2) provide a list of the names and addresses of such beneficial owners to the Claims Administrator. If you choose to mail the Notice Package 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 reasonable administrative costs actually incurred in connection with forwarding the Notice Package that would not have been incurred but for the obligation to forward it, upon submission of appropriate documentation to the Claims Administrator and subject to approval by the Court, in an amount not to exceed \$0.75 per Notice Package unit mailed or \$0.15 per Class Member identified and provided to the Claims Administrator. All communications concerning the foregoing should be directed to the Claims Administrator by email to nominees@EndoChoiceSecuritiesLitigation.com, or by mail to:

EndoChoice Securities Litigation
c/o KCC Class Action Services
Nominees
3301 Kerner Blvd
San Rafael, CA 94901

Dated: March 2, 2020

BY ORDER OF THE COURT
SUPERIOR COURT OF GEORGIA, FULTON COUNTY

⁴ The "Total Purchase Amount" is the total amount the Claimant paid (excluding commissions and other charges) for EndoChoice common stock purchased or acquired during the Class Period.

⁵ The Claims Administrator shall match any sales of EndoChoice common stock during the Relevant Period, first against the Claimant's opening position in EndoChoice common stock (the proceeds of those sales will not be considered for purposes of calculating market gains or losses). The total amount received (excluding commissions and other charges) for the remaining sales of EndoChoice common stock sold during the relevant period shall be the "Total Sales Proceeds."

⁶ The Claims Administrator shall ascribe a value of \$8.00 per share for EndoChoice common stock purchased or acquired during the Class Period and still held as of the close of trading on September 27, 2016 (the date of the announcement of the Boston Scientific tender offer), and the resulting total value of such shares using that per share value shall be the "Holding Value".

IN THE SUPERIOR COURT OF THE STATE OF GEORGIA
COUNTY OF FULTON

IN RE ENDOCHOICE HOLDINGS, INC.) CIVIL ACTION NO. 2016 CV 277772
SECURITIES LITIGATION) (Consolidated with Civil Action No. 2016 CV 281193)

PROOF OF CLAIM AND RELEASE

I. IMPORTANT INFORMATION

1. To recover as a Member of the Class based on your claims in the above-captioned action (the “Action”) you must complete and, on page 5 hereof, *sign* this Proof of Claim and Release. If you fail to file a timely and properly addressed Proof of Claim and Release, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement of the Action.

2. Submission of this Proof of Claim and Release, however, does not assure that you will share in the proceeds of settlement in the Action.

3. YOU MUST MAIL YOUR COMPLETED AND SIGNED PROOF OF CLAIM AND RELEASE POSTMARKED ON OR BEFORE JUNE 30, 2020, ADDRESSED TO THE CLAIMS ADMINISTRATOR AT THE ADDRESS SET FORTH ON PAGE 6 BELOW.

4. If you are **NOT** a Class Member, as defined in the Notice of Proposed Settlement of Class Action (“Notice”), do **NOT** submit a Proof of Claim and Release form. In general, you will potentially qualify as a class member *only* if you purchased shares of the common stock of EndoChoice Holdings, Inc. (“EndoChoice” or the “Company”; ticker symbol “GI”) during the period from the 4:00 p.m. EDT close of trading on June 4, 2015 (when the registration statement for EndoChoice’s June 5, 2015 initial public offering (the “IPO”) was declared “effective”) through and including August 3, 2016 (the “Relevant Period”).

5. If you are a Class Member, you will be bound by the terms of any judgment entered in the Action, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM, unless you file a request for exclusion as explained in the Notice.

II. DEFINITIONS

1. “Defendants” means, collectively, (i) EndoChoice; (ii) Mark G. Gilreath, David N. Gill, R. Scott Huennekens, James R. Balkcom, Jr., J. Scott Carter, D. Scott Davis, David L. Kaufman, and Rurik G. Vandevenne (the “Individual Defendants” and, collectively with EndoChoice, the “EndoChoice Defendants”); and (iii) J.P. Morgan Securities LLC, Merrill Lynch, Fenner & Smith Incorporated, William Blair & Company, L.L.C. and Stifel, Nicolaus & Company, Incorporated (collectively, the “Underwriter Defendants”).

2. “Released Claims” means all claims (including Unknown Claims as defined below), demands, rights and causes of action of any kind that have been or could have asserted in the Action, or could in future be asserted in any forum, whether arising under federal, state, common, statutory, or foreign law, or any other rule or regulation, by any Lead Plaintiff, any Class Member, or any of their Related Parties¹ against any Released Defendants’ Party (as defined below), which both (a) arise out of or relate in any way to any of the allegations, acts, transactions, facts, events, matters, occurrences, statements, representations or omissions set forth, alleged or referred to in the Action, or which could have been alleged in the Action; and (b) arise out of or relate to the purchase, acquisition, holding, disposition or sale of any shares of EndoChoice common stock issued in or pursuant to the IPO. Notwithstanding the foregoing, “Released Claims” does not, however, include any claims to enforce the Settlement.

3. “Released Defendants’ Claims” means all claims (including “Unknown Claims” as defined below), demands, rights, and causes of action of any kind by any Released Defendants’ Party (as defined below) against Lead Plaintiffs, any Class Members, or any of their Related Parties, which arise out of or relate in any way to the institution, prosecution, assertion, settlement, or resolution of the Action (except for claims to enforce the Settlement).

4. “Released Defendants’ Parties” (each a “Released Defendant Party”) means each Defendant and each of their respective Related Parties.

5. “Unknown Claims” means any and all Released Claims of every nature and description against the Released Defendants’ Parties which any Class Member does not know or suspect to exist in his, her or its favor at the time

¹ “Related Parties”, when used in reference to any person or entity (“Person”), refers to and includes (i) the Person; (ii) for natural persons (such as individuals), each of that Person’s respective immediate family members and any trust of which the Person is the settler or which is for the benefit of any such Person and/or member of his or her family, and, for non-natural persons (such as a company or trust), each of their direct or indirect parents or subsidiaries; and (iii) for any of the persons listed in sub-parts (i) or (ii) of this definition, their respective past, present, and future general partners, limited partners, principals, controlling shareholders, joint venturers, members, officers, directors, managers, managing directors, employees, contractors, consultants, auditors, accountants, financial advisors, professional advisors, investment bankers, legal representatives, insurers, trustees, trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof, in their capacities as such, and any entity in which any such Person has a controlling interest.

of their release of the Released Claims, including without limitation those which, if known by such Class Member, might have affected his, her or its decisions with respect to the Settlement or the releases. With respect to any and all Released Claims, the Parties agree that, upon the Effective Date, each Class Member shall be deemed to have waived, and by operation of the Judgment shall have waived, any and all rights and benefits conferred by any law of any state or territory of the United States, or any principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542, which provides:

A general release does not extend to claims which the creditor does not know or suspect to exist in his or her favor at the time of executing the release, which if known by him or her must have materially affected his or her settlement with the debtor.

6. All capitalized terms not otherwise defined herein shall have the meanings set forth in the Stipulation and Agreement of Settlement dated January 30, 2020 (the "Stipulation") and the exhibits thereto.

III. INSTRUCTIONS

1. Use Part I of this form entitled "Claimant Identification" to identify each purchaser of the EndoChoice common shares that are the subject of this claim. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASERS.**

2. All joint purchasers must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of Persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The last four digits of the Social Security (or Taxpayer Identification) Number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

3. Use Part II of this form entitled "Schedule of Transactions in EndoChoice Common Stock" to supply all required details of your transaction(s) in EndoChoice common shares, including transactions relating to any short positions you may have taken with respect to EndoChoice common stock. If you need more space or additional schedules, attach separate sheets (or make additional copies of the transaction schedule at PART II below) giving all the required transaction information in substantially the same form. Print the beneficial owner's name, and the last four digits of their Social Security or Taxpayer Identification Number (see ¶2 above), on each additional sheet (if any).

4. On the schedules, provide all of the required information with respect to all of the following: (a) your net position in EndoChoice common shares as of the close of trading on June 4, 2015 (immediately *before* the IPO); (b) the number of EndoChoice common shares you purchased in EndoChoice's June 5, 2015 IPO at the initial offering price of \$15.00 per share, as well as each and every post-IPO purchase of EndoChoice common shares purchased from June 5, 2015 on the open market through and including August 3, 2016; (c) each and every sale of EndoChoice common shares sold during the period from June 5, 2015 through and including September 27, 2016; (d) a statement of the number of additional EndoChoice common shares (if any) purchased between August 4, 2016 and September 27, 2016, inclusive; and (e) your net position in EndoChoice common shares as of the close of trading on September 27, 2016.² Failure to report all required information for all of your transactions in shares of EndoChoice common stock (including short positions) may result in the rejection of your claim. List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

5. Attach *copies* of trade confirmations, relevant portions of brokerage statements or other documentation of your transactions in EndoChoice common shares (including short positions) to your completed Claim Form. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim.

6. The above requests are designed to provide the minimum amount of information necessary to process the simplest claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate the amount of claim. In some cases where the Claims Administrator cannot perform the calculation accurately or at a reasonable cost to the Class with the information provided, the Claims Administrator may condition acceptance of the claim upon the production of additional information and/or the hiring of an accounting expert at the claimant's cost.

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 Claim Form whether or not they also submit electronic copies. If you wish to file your claim electronically, you must visit the Settlement website at www.EndoChoiceSecuritiesLitigation.com 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.

² Information on your *sales* through (and holdings as of) September 27, 2016 (rather than through and as of August 3, 2016) is requested to determine whether or not you were able to benefit from the sharp increase in the price of EndoChoice common stock that occurred after the close of business on September 27, 2016 when Boston Scientific announced a tender offer to acquire all outstanding EndoChoice common shares at \$8.00 per share.

Official
Office
Use
Only

SUPERIOR COURT OF THE STATE OF
GEORGIA COUNTY OF FULTON

*In re Endochoice Holdings, Inc.
Securities Litigation*

Civ. No. 2016 cv 277772

PROOF OF CLAIM AND RELEASE

Please Type or Print in the Boxes Below
Do **NOT** use Red Ink, Pencil, or Staples

**Must Be Postmarked
No Later Than June 30, 2020**

EHL

PART I: CLAIMANT IDENTIFICATION

Last Name (Beneficial Owner)

M.I.

First Name (Beneficial Owner)

Last Name (Co-Beneficial Owner)

M.I.

First Name (Co-Beneficial Owner)

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number¹

or

Taxpayer Identification Number

Telephone Number (Primary Daytime)

Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address

City

State

Zip Code

Foreign Province

Foreign Postal Code

Foreign Country Name/Abbreviation

¹ The last four digits of the taxpayer identification number (TIN), consisting of a valid Social Security number (SSN) for individuals or employer identification number (EIN) for business entities, trusts, estates, etc., and telephone number of the beneficial owner(s) may be used in verifying this claim.

FOR CLAIMS PROCESSING ONLY	OB <input type="text"/>	CB <input type="text"/>	<input type="radio"/> ATP <input type="radio"/> KE <input type="radio"/> ICI	<input type="radio"/> BE <input type="radio"/> DR <input type="radio"/> EM	<input type="radio"/> FL <input type="radio"/> ME <input type="radio"/> ND	<input type="radio"/> OP <input type="radio"/> RE <input type="radio"/> SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
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PART II. SCHEDULE OF TRANSACTIONS IN ENDOCHOICE COMMON STOCK

1. BEGINNING NET POSITION – State the net total number of shares of EndoChoice common stock **owned** as of 4:00 pm EDT on June 4, 2015 (immediately before EndoChoice's IPO), long or short (*if a net short position, enter a negative value*):

--	--	--	--	--	--	--	--	--	--

2. PURCHASES OF ELIGIBLE SHARES (through August 3, 2016) – Separately list each purchase of EndoChoice common shares from 4:00pm EDT on June 4, 2015 (when the Registration Statement for EndoChoice's June 5, 2015 IPO was declared effective) through and including August 3, 2016 (*must be documented*):

PURCHASES									
Date of Purchase (List Chronologically)						Number of Shares Purchased		Purchase Price Per Share	Total Purchase Price (excluding taxes, commissions and fees). Please round off to the nearest whole dollar
M	M	D	D	Y	Y				
1.			/		/			\$	
2.			/		/			\$	
3.			/		/			\$	
4.			/		/			\$	

3. SUBSEQUENT PURCHASES FROM AUGUST 4, 2016 THROUGH SEPTEMBER 27, 2016 – State the total number of EndoChoice common shares (if any) purchased between August 4, 2016 and September 27, 2016, inclusive. (individual transaction details and documentation not required unless later requested by the Claims Administrator)²:

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4. SALES FROM JUNE 5, 2015 THROUGH SEPTEMBER 27, 2016 – Separately list each sale of EndoChoice common shares (including short sales, if any) during the period from June 5, 2015 through and including September 27, 2016 (*must be documented*):

SALES									
Date of Sale (List Chronologically)						Number of Shares Sold		Sale Price Per Share	Total Sale Price (excluding taxes, commissions and fees). Please round off to the nearest whole dollar
M	M	D	D	Y	Y				
1.			/		/			\$	
2.			/		/			\$	
3.			/		/			\$	
4.			/		/			\$	

5. ENDING NET POSITION – State your net position (in shares) in EndoChoice common stock **owned** as of the close of trading on September 27, 2016 (*if other than zero, must be documented; if a net short position, enter a negative value*):

--	--	--	--	--	--	--	--	--	--

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS PLEASE PHOTOCOPY THIS PAGE
(OR PRINT ADDITIONAL PAGES FROM THE SETTLEMENT WEBSITE, WWW.ENDOCHOICESECURITIESLITIGATION.COM).

If you are submitting any additional pages setting forth your additional transactions in EndoChoice shares, PLEASE FILL IN THIS CIRCLE: ☐

IF YOU DO NOT FILL IN THIS CIRCLE THESE ADDITIONAL PAGES MAY NOT BE REVIEWED.

**YOU MUST READ AND SIGN THE RELEASE ON PAGE 5. FAILURE TO SIGN THE RELEASE
MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.**

² This information is required so that the Claims Administrator can verify that your reported purchases and sales "balance" for the period from the date of the IPO through the date that Boston Scientific announced its tender offer to purchase EndoChoice, which in turn will facilitate the accurate processing of your Claim. However, please note that, consistent with the Court's class certification order, any shares purchased after August 3, 2016 are not eligible for damages under the Settlement, and accordingly no losses incurred on such purchases will be calculated or considered for purposes of calculating your Recognized Claim under the Plan of Allocation.



PART III. RELEASE OF CLAIMS, CERTIFICATION AND SIGNATURE

- A. I (we) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever waive, release, discharge, and dismiss each and every one of the Released Defendants' Parties with respect to any and all of the Released Claims; and
- B. I (we) hereby acknowledge that as of the Effective Date, I (we): (i) shall be deemed to have, and shall have, fully, finally, and forever waived, released, relinquished, and discharged all Released Claims against the Released Defendants' Parties; and (ii) shall forever be enjoined from prosecuting any Released Claims against any of the Released Defendants' Parties.

By signing and submitting this Proof of Claim, the claimant(s) or the person(s) who represent(s) the claimant(s) certifies, as follows:

1. that I (we) have read and understand the contents of the Notice, the Plan of Allocation and the Proof of Claim, including the releases provided for in items A and B immediately above;
2. that the claimant(s) is a (are) Class Member(s), as defined in the Notice, and is (are) not excluded from the Class;
3. that the claimant has not submitted a request for exclusion from the Class;
4. that I (we) purchased and own(ed) the EndoChoice common shares identified in this Proof of Claim and have not assigned my (our) claims against the Released Defendants' Parties to another, or that, in signing and submitting this Proof of Claim, I (we) have the authority to act on behalf of the owner(s) thereof;
5. that the claimant has not submitted any other claim covering the same purchases or acquisitions of EndoChoice common shares and knows of no other person having done so on his/her/its behalf;
6. that the claimant submits to the jurisdiction of the Court with respect to his/her/its claim and for purposes of enforcing the releases set forth herein;
7. that I (we) agree to furnish such additional information with respect to this Proof of Claim as the Claims Administrator or the Court may require;
8. that the claimant waives the right to trial by jury, to the extent it exists, and agrees to the Court's summary disposition of the determination of the validity or amount of the claim made by this Proof of Claim;
9. that I (we) acknowledge that the claimant will be bound by and subject to the terms of any judgment that may be entered in the Action; and
10. that the claimant is ***NOT*** subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because: (a) the claimant is exempt from backup withholding; or (b) the claimant has not been notified by the IRS that he/she/it is subject to backup withholding as a result of a failure to report all interest or dividends; or (c) the IRS has notified the claimant that he/she/it is no longer subject to backup withholding. *If the IRS has notified the claimant that it is subject to backup withholding, please strike out the language in the preceding sentence indicating that the claim is not subject to backup withholding.*

UNDER PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL INFORMATION PROVIDED BY ME (US) ON THIS FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HERewith ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)



A Proof of Claim received by the Claims Administrator shall be deemed to have been submitted when posted, if mailed by June 30, 2020, and if a postmark is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. 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 fully process all of the Proof of Claim forms. Please notify the Claims Administrator of any change of address.

Reminder Checklist:

1. Please sign the above release and certification. If this Proof of Claim is being made on behalf of joint claimants, then both must sign.
2. Remember to attach only *copies* of acceptable supporting documentation.
3. Please do not highlight any portion of the Proof of Claim or any supporting documents.
4. Do not send original securities certificates or other original documentation. These items cannot be returned to you by the Claims Administrator.
5. Keep copies of your completed Proof of Claim and the originals of your documentation for your own records.
6. The Claims Administrator will acknowledge receipt of your Proof of Claim by mail within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard. If you do not receive an acknowledgement postcard within 60 days, please call the Claims Administrator toll-free at (866) 610-7723.
7. If your address changes in the future, or if this Proof of Claim was sent to an old or incorrect address, please send the Claims Administrator written notification of your new address. If you change your name, please inform the Claims Administrator.
8. If you have any questions or concerns regarding your claim, please contact the Claims Administrator at the address below or at (866) 610-7723, or visit www.EndoChoiceSecuritiesLitigation.com.

THIS CLAIM FORM MUST BE MAILED TO THE CLAIMS ADMINISTRATOR BY FIRST-CLASS MAIL, POSTAGE PREPAID, POSTMARKED BY JUNE 30, 2020 AND ADDRESSED TO:

EndoChoice Securities Litigation
c/o KCC Class Action Services
P.O. Box 43034
Providence, RI 02940-3034



Exhibit B

Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP Announce Proposed Settlement in the EndoChoice Holdings Securities Litigation

NEWS PROVIDED BY
[Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP →](#)
Mar 09, 2020, 08:00 ET

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ATLANTA, March 9, 2020 /PRNewswire/ -- The following statement is being issued by Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP regarding the EndoChoice Holdings Securities Settlement:

IN THE SUPERIOR COURT OF THE STATE OF GEORGIA COUNTY OF FULTON	
IN RE ENDOCHOICE HOLDINGS, INC. SECURITIES LITIGATION	CIVIL ACTION NO. 2016 CV 277772 (Consolidated with Civil Action No. 2016 cv 281193)

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

To: All persons who purchased EndoChoice Holdings, Inc. common stock between the 4:00 p.m. EDT close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive.

YOU ARE HEREBY NOTIFIED, a hearing will be held at 10:00 a.m. EDT on June 15, 2020, before the Honorable Elizabeth E. Long in Courtroom 9J, of the Georgia Superior Court of Fulton County, Business Division, 136 Pryor Street, Atlanta, Georgia 30303 (the "Court"), to determine whether the Court should: (1) approve the proposed Settlement of the above-captioned consolidated action titled *In re EndoChoice Holdings, Inc. Securities Litigation*, C.A. No. 2016 CV 277772 (the "Action") for \$8,500,000 in cash as fair, reasonable, and adequate; (2) approve the proposed Plan of Allocation of Settlement proceeds as fair, reasonable, and adequate; (3) approve Plaintiffs' Counsel's request for an award of attorneys' fees and reimbursement of expenses, and grant the lead plaintiffs an award for their service to the Class; and (4) enter a Judgment dismissing the Action with prejudice (the "Judgment"). The Court may change the hearing date without further notice to the Class.

If you purchased EndoChoice common stock between the 4:00 p.m. EDT close of U.S. trading markets on June 4, 2015 and August 3, 2016, inclusive, your rights may be affected by this Settlement. If you have not received the detailed Notice of Proposed Class Action Settlement (the "Notice") and a copy of the Proof of Claim and Release form, you may obtain copies, free of charge, by downloading a copy at www.EndoChoiceSecuritiesLitigation.com, or by writing to *EndoChoice Securities Litigation*, c/o KCC Class Action Services, P.O. Box 43034, Providence, RI 02940-3034, or by calling the Claims Administrator toll-free at 1-866-610-7723.

If you are a member of the Class (as defined in the Notice) and wish to share in the Settlement proceeds, you must complete and submit a valid Proof of Claim and Release form to the Claims Administrator, postmarked no later than **June 30, 2020**. If you fail to submit a valid Proof of Claim and Release by this deadline in accordance with the instructions in the Proof of Claim and Release form, you will not recover from the Net Settlement Fund, but you will nevertheless be bound by the Settlement and releases provided for in the Settlement and in the Judgment.

If you are a Class Member and wish to object to any aspect of the Settlement, the Plan of Allocation, or Plaintiffs' Counsel's Fee and Expense Application, you must submit any objections in writing in the manner set forth in the Notice no later than **May 25, 2020**. Only Class Members who have submitted valid and timely written objections and provided notice of their intent to appear in accordance with the instructions in the Notice will be entitled to be heard at the hearing on **June 15, 2020**.

Notwithstanding any objection you may submit, if you are a member of the Class you will be bound by the Settlement and releases provided for therein and by the Judgment unless you request to be excluded from the Class. To request exclusion, you must submit a written request in the manner set forth in the Notice so that it is received no later than **May 25, 2020**. If you submit a timely and valid request to be excluded from the Class that is accepted by the Court, you will not be required to waive or release any claims against Defendants, you will not receive any payment or other benefit in the Settlement, and you will not be bound by the Settlement or any other order or Judgment that may be entered by the Court.

PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR THEIR COUNSEL REGARDING THIS NOTICE.

DATED: March 9, 2020 BY ORDER OF THE SUPERIOR COURT OF THE STATE OF GEORGIA, FULTON COUNTY

SOURCE Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP

You just read:

Scott+Scott Attorneys at Law LLP and Levi & Korsinsky, LLP Announce Proposed Settlement in the EndoChoice Holdings Securities Litigation

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Mar 09, 2020, 08:00 ET

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Date: Monday, March 9, 2020 8:00:28 AM

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* If the page link does not load immediately, please refresh and try again after a few minutes.

Exhibit C



P.O. Box 6191, Novato, CA 94948-6191
415-798-5900, 800-211-5201
Fax: 415-892-7354
www.kccllc.com
Fed Tax ID# 20-8049009

In Re Endochoice Holdings, Inc. Securities Litigation
Settlement Fund
PO Box 6191
Novato CA 94948

Contact Lance Cavallo
Telephone (415)798-5997
Job Number EHL

Account Number	EHL-ROS	Invoice Date	23 April 2020
Invoice Number	US_ASG1800957	Due Date	23 May 2020

For services rendered through the end of March 2020

<u>Expenses</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
Published Notice			\$4,337.00
Notice Packet Printing	10,000	\$0.75	\$7,500.00
First Class Postage			\$2,477.20
Email Notice & Claim Forms			\$500.00
Website Setup	1	\$1,375.00	\$1,375.00
Website Hosting	2	\$50.00	\$100.00
IVR Line Charges	73.83	\$0.18	\$13.29
IVR Programming	1	\$3,750.00	\$3,750.00
Claims Processing	13	\$7.00	\$91.00
Broker Reimbursements			\$3.75
Total Expenses			\$20,147.24

<u>Staff Hours</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
Mail/Email Correspondence			\$862.85
Total Staff Hours			\$862.85



Account Number	EHL-ROS	Invoice Date	23 April 2020
Invoice Number	US_ASG1800957	Due Date	23 May 2020

For services rendered through the end of March 2020

Invoice Subtotal	\$21,010.09
Total Sales and Use Tax	\$179.60
Total Amount Due	<u>\$21,189.69</u>

Please detach and return this portion of the statement with your check to the address listed below.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number	EHL-ROS	Remit Check Payments to: Kurtzman Carson Consultants LLC Dept CH 16639 Palatine, IL 60055-6639
Invoice Number	US_ASG1800957	
Total Amount Due	\$21,189.69	
Amount Paid	\$ <input type="text"/>	

Wire Payments to:
Kurtzman Carson Consultants LLC
HSBC Bank, NA
452 Fifth Avenue
New York, NY 10081
Account # 000183571
FED ABA # 021001088
ACH Routing # 022000020