

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 16-cv-62506 (FAM)(LFL)

JULIE SIEGMUND and SETH LIPNER, as
Co-Successor Trustees of **THE FREDERICK
SIEGMUND LINKWELL CORP. CLAIMS
LIVING TRUST DATED JULY 31, 2018**,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

**XUELIAN BIAN, WEI GUAN,
SIDLEY AUSTIN LLP, SHANGHAI
YINLING ASSET MANAGEMENT CO.,
LTD., LEADING FIRST CAPITAL
LIMITED and LEADING WORLD
CORPORATION**,

Defendants.

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

**TO: ALL PERSONS AND ENTITIES WHO OWNED ONE OR MORE SHARES OF
LINKWELL CORPORATION COMMON STOCK AS OF THE CLOSE OF
BUSINESS ON SEPTEMBER 19, 2014, WHO DID NOT VOTE TO APPROVE THE
MERGER BETWEEN LINKWELL CORPORATION AND LEADING WORLD
CORPORATION, WHOSE SHARES WERE CANCELED AS A RESULT OF THE
MERGER, AND WERE DAMAGED THEREBY.**

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS
MAY BE AFFECTED BY PROCEEDINGS IN THIS LITIGATION. PLEASE NOTE THAT IF
YOU ARE A CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS
OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THIS
FUND, YOU MUST SUBMIT A VALID PROOF OF CLAIM AND REQUESTED
DOCUMENTATION AND RELEASE FORM ("PROOF OF CLAIM") **POSTMARKED OR
SUBMITTED ONLINE ON OR BEFORE FEBRUARY 4, 2020.**

- Plaintiffs, Julie Siegmund and Seth Lipner as Co-Successor Trustees of The Frederick Siegmund Linkwell Corp. Claims Living Trust dated July 31, 2018 ("Proposed Class Representatives"), have reached a proposed settlement in the amount of \$6,000,000 in cash (the "Settlement") on behalf of the proposed

Questions? Please call 1-833-285-1327 or visit www.linkwellcorpshareholderlitigationsettlement.com

Settlement Class.¹ The Settlement will resolve all claims against the Released Parties (as defined below) in this proposed class action (the “Action”).

- The Settlement, if approved by the Court, will: resolve all known and unknown claims of Class Members as against Defendants Xuelian Bian, Wei Guan, and Sidley Austin LLP (collectively, “Defendants”)² relating to the sale and cancellation of their Linkwell Corporation (“Linkwell”) common stock, the subject matter of the Action, and any and all claims that were or could have been asserted therein; avoid the costs and risks of continuing the Action; provide a cash payment to Class Members who timely submit valid claims; and release Bian, Guan, and Sidley from liability.
- The Court in charge of the Action still has to decide whether to approve the Settlement. Cash payments will be made if the Court approves the Settlement and after any appeals are resolved.

SUMMARY OF THIS NOTICE

I. DESCRIPTION OF THE ACTION AND THE CLASS

This Notice relates to a proposed Settlement of claims in a pending securities class action lawsuit brought by an investor alleging, among other things, that Bian and Guan violated the federal securities law and Florida law by engaging in a fraudulent scheme to cause the forced sale of Linkwell common stock through an undisclosed go-private merger transaction between Linkwell and Leading World (the “Merger”) resulting in the cancellation of Linkwell minority shareholders’ common stock without due notice and for less than fair value; and that Sidley allegedly violated Florida law by aiding and abetting Bian and Guan in connection with a breach of their fiduciary duties. If approved by the Court, the Settlement will settle claims of all persons and entities who owned one or more shares of Linkwell common stock as of the close of business on September 19, 2014, who did not vote to approve the Merger, and whose shares were canceled as a result of the Merger (the “Class”).

II. STATEMENT OF RECOVERY BY THE CLASS

Subject to Court approval, and as described more fully on pages 7-10 below, Proposed Class Representatives, on behalf of the proposed Class, have agreed to settle all claims in the Action in exchange for a cash payment of \$6,000,000 (the “Settlement Amount”). The claims that will be resolved by the Settlement include any and all claims (including Unknown Claims as set forth below) that could have been asserted based on, arising from or relating to: the allegations, facts, matters, events, transactions, acts, occurrences, statements, representations, misrepresentations, or

¹ All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Settlement Agreement dated as of May 1, 2019 (the “Stipulation”).

² The defendants named in the Action are: Xuelian Bian (“Bian”), Wei Guan (“Guan”), Sidley Austin LLP (“Sidley”), Shanghai Yinling Asset Management Co., Ltd. (“Yinling”), Leading First Capital Limited (“Leading First”), and Leading World Corporation (“Leading World”). Bian, Guan, Sidley, and Leading World were served with pleadings in the Action. Leading World failed to appear in the Action and a default was entered against it. Service of the pleadings abroad upon Yinling and Leading First was not completed.

omissions or failures to act that were alleged or could have been alleged in the Action; and any disclosures, non-disclosures and/or public statements made in connection with any of the foregoing. The Settlement Amount will be deposited into an interest-bearing escrow account (the “Settlement Fund”). *Based on Proposed Class Counsel’s estimate of the number of shares affected, the estimated average recovery, before deducting Court awarded attorneys’ fees and expenses and Notice Administration Expenses, is \$29.93 per share (assuming all eligible Class Members file valid claims valued at the full amount of the claim). Class Members should note, however, that the foregoing is only an estimate. A Class Member’s actual recovery will depend on several things, including: (1) the number of claims filed; (2) the country of residence of Class Members; (3) the amount of Notice Administration Expenses; and (4) the amount of attorneys’ fees and costs awarded by the Court to proposed Class counsel.* The Net Settlement Fund (the Settlement Fund less court-awarded attorneys’ fees and expenses, Notice and Administration Expenses, any required Taxes or Tax Estimates payments, and any other fees or expenses approved by the Court) will be distributed in accordance with a proposed plan of allocation (the “Plan of Allocation”) that will be approved by the Court and will determine how the Net Settlement Fund shall be allocated to Class Members. The Plan of Allocation is described in this Notice (see page 16 below).

III. STATEMENT OF POTENTIAL OUTCOME OF THE CASE

Proposed Class Representatives and Defendants (the “Settling Parties”) do not agree on whether Proposed Class Representatives would have prevailed on the claims against Defendants. Nor do they agree on the average amount of damages per security that might be recoverable if Proposed Class Representatives were to prevail on Class Members’ claims. Proposed Class Representatives’ expert valued the claims against Defendants at a range between \$17 million to \$62 million. Sidley’s expert valued the claims at \$0.00.

Defendants deny that they have engaged in any wrongdoing as alleged by Proposed Class Representatives, deny any liability whatsoever for any of the claims that were alleged in the First Amended Class Action Complaint, and deny that Class Members’ shares of Linkwell common stock were canceled in connection with the Merger without due notice and for less than fair value. The issues on which Settling Parties disagree include: (i) whether Bian and Guan engaged in any scheme to defraud or deceive Class Members in connection with the Merger and the sale of their shares of Linkwell stock; (ii) whether Bian and Guan breached their fiduciary duty to Class Members by not providing them with notice of the Merger and any opportunity to assess the fairness of the Merger consideration of \$0.88 per share of Linkwell common stock; (iii) whether Sidley aided and abetted breaches of fiduciary duty owed by Bian and Guan to Linkwell shareholders; (iv) whether Defendants conspired with one another to consummate the Merger without notice to Class Members and for less than fair value; (v) whether or not Defendants’ conduct caused any harm to Class Members for which any damages could be recovered if Proposed Class Representatives were to have prevailed on each claim alleged; (vi) the fair value of Linkwell common stock as of the close of business on September 19, 2014 – the date when Bian, Guan, and certain other shareholders approved the Merger at the Special Meeting of Linkwell Shareholders; and (iv) whether Defendants had other meritorious defenses to the alleged claims.

IV. STATEMENT OF ATTORNEYS’ FEES AND LITIGATION EXPENSES SOUGHT

Proposed Class Counsel (as defined in Question 16 below) will apply to the Court for an award of attorneys’ fees from the Settlement Fund in an amount not to exceed 35% of the Settlement

Amount and an award of litigation expenses incurred in connection with the prosecution and resolution of the Action, in an amount not to exceed \$450,000, plus interest on both amounts from the date of funding at the same rate as earned by the Settlement Fund. If the Court approves the attorneys' fees and expense application in full, the average amount of fees and expenses will be approximately \$12.72 per share. In addition, Proposed Class Counsel will apply for the reimbursement to The Frederick Siegmund Linkwell Corp. Claims Living Trust dated July 31, 2018 ("The Siegmund Trust") for its reasonable costs and expenses (including lost wages) directly relating to its representation of the proposed Class, in an amount not to exceed \$15,000, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA").

V. IDENTIFICATION OF ATTORNEYS' REPRESENTATIVES

Proposed Class Representatives are being represented by: Wolf Haldenstein Adler Freeman & Herz LLP, 270 Madison Avenue, New York, New York 10016.

VI. REASONS FOR THE SETTLEMENT

For Proposed Class Representatives, the principal reason for the Settlement is the immediate benefit of a substantial cash recovery for the Class. This benefit must be compared to the risk that no recovery or a smaller recovery might be achieved after the Court decides any class certification or summary judgment motions and after a contested trial and likely appeals are resolved, possibly years into the future. For Defendants, who deny all allegations of liability and deny that any Class Members were damaged, the principal reason for the Settlement is to eliminate the burden, expense, uncertainty and risk of further litigation.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT:

ACTIONS YOU MAY PURSUE	EFFECT OF TAKING THIS ACTION
<p>SUBMIT A PROOF OF CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN FEBRUARY 4, 2020</p>	<p>This is the only way to get a cash payment from the Settlement.</p>
<p>EXCLUDE YOURSELF FROM THE CLASS BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION RECEIVED BY NO LATER THAN OCTOBER 21, 2019</p>	<p>Get no payment. This is the <i>only</i> option that allows you to pursue a lawsuit against Defendants concerning the claims that were, or could have been, asserted in this case. It is also the only way for Class Members to remove themselves from the Class. If you are considering excluding yourself from the Class, please note that there is a risk that any new claims asserted against Defendants may no longer be timely and would be time-barred. You should talk to a lawyer before you request exclusion from the Class for the purpose of bringing a separate lawsuit. See page 12 below.</p>
<p>OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION RECEIVED BY NO LATER THAN OCTOBER 29, 2019</p>	<p>Write to the Court and explain why you do not like the Settlement, the proposed Plan of Allocation, and/or the request for attorneys' fees and expenses. In order to object, you must remain a Class Member, may not exclude yourself, and you will be bound by the Court's determinations.</p>
<p>GO TO THE HEARING ON NOVEMBER 19, 2019 AT 2 P.M., AND FILE A NOTICE OF INTENTION TO APPEAR SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 29, 2019</p>	<p>Ask to speak in Court about the fairness of the Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and expenses.</p>
<p>DO NOTHING</p>	<p>You will not be eligible to receive a payment from the Settlement, you will give up your rights, your pro rata share of the Net Settlement Fund will be allocated among Authorized Claimants, and you will still be bound by the Settlement.</p>

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BASIC INFORMATION

1. Why did I get this notice package?

You or someone in your family may have owned Linkwell common stock as of the close of business on September 19, 2014, the day that the Merger was approved.

The Court directed that this Notice be sent to Class Members because they have a right to know about the proposed partial Settlement in this Action, and about all of their options, before the Court decides whether to approve the Settlement. If approved, the Settlement will end all of the Class's claims against Defendants. The Court will consider whether to approve the Settlement at a Settlement Hearing on November 19, 2019 at 2 p.m. If the Court approves the Settlement, and after any appeals are resolved and the Settlement administration is completed, the Claims Administrator appointed by the Court will make the payments that the Settlement allows.

The Court in charge of the case is the United States District Court for the Southern District of Florida, and the case is known as *Julie Siegmund and Seth Lipner as Co-Successor Trustees of The Frederick Siegmund Linkwell Corp. Claims Living Trust dated July 31, 2018 v. Xuelian Bian, et al.*, Civil Action No. 0:16-cv-62506-FAM (S.D. Fla.). This case was assigned to United States District Judge Federico A. Moreno. The parties that are suing are called "Proposed Class Representatives" and the companies and the persons being sued are called "Defendants."

2. What is this lawsuit about and what has happened so far?

Proposed Class Representatives' claims in the Action are stated in the First Amended Class Action Complaint dated October 19, 2017 (the "Complaint"). Proposed Class Representatives alleged claims against some or all of the Defendants for violations of Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), and Florida law for breaches of fiduciary duty, aiding and abetting breaches of fiduciary duty, and civil conspiracy. The Complaint alleged that Defendants violated the federal securities law and/or Florida law by allegedly undertaking the Merger to (a) extinguish the valuable claims asserted in a previously filed derivative action on behalf of Linkwell; and (b) take Linkwell private and acquire the assets and operations of Linkwell's subsidiary businesses without due notice and for less than fair consideration.

The Action was commenced on October 24, 2016. Sidley moved to dismiss the Action on December 15, 2017. On September 29, 2017, the Court entered an Order granting the motion to dismiss, however, with leave to file an amended complaint. As set forth above, the amended pleading was filed on October 19, 2017.

On December 18, 2017 and January 30, 2018, Defendants filed motions to dismiss the Complaint for failure to state a claim upon which relief could be granted, lack of personal jurisdiction, and insufficient service of process. On January 17 and February 23, 2018, the motions were opposed. On April 2, 2018, the Court entered an Order granting the dismissal of the Section 10(b) claims against Sidley, however, sustained the Florida law claims in the Complaint for aiding and abetting breach of fiduciary duty and civil conspiracy. In another Order entered on the same date, the Court sustained the Section 10(b) claims and Florida law claims for breach of fiduciary duty and civil conspiracy against Bian and Guan. On May 14, 2018, the Court entered an Order denying Sidley's motion for reconsideration of that part of the Order that sustained the Florida law claims. Fact and expert discovery was thereafter conducted by the parties.

On June 5 and September 28, 2018, the parties participated in mediations of the Action before a well-respected mediator, Jed Melnick. Proposed Class Representatives and Defendants subsequently agreed to resolve the Action for \$6,000,000 in cash subject to the negotiation of the terms of the Settlement Agreement and approval by the Court.

The Settling Parties entered into the Stipulation on May 1, 2019. On July 12, 2019, the Court preliminarily approved the Settlement, authorized this Notice to be sent to potential Class Members, and scheduled the Fairness Hearing to consider whether to grant final approval to the Settlement.

3. Why is this a class action?

In a class action, one or more people called class representatives (in this case Proposed Class Representatives) sue on behalf of people or entities, known as “Class Members” who have similar claims. A class action allows one court to resolve in a single case many similar claims that, if brought separately by individuals, might be so small that they would not be economical to litigate and thus would never be brought. One court resolves the issues for all class members, except for those who exclude themselves, or “opt out,” from the Class (*see* Question 13 below).

4. Why is there a settlement?

The Court has not decided the Action in favor of Proposed Class Representatives or Defendants. The Settlement will end all the claims against Defendants in the Action and avoid the uncertainties and costs of further litigation and any future trial. Assuming the Settlement is approved, affected investors will be eligible to receive cash compensation once the claims made against the Net Settlement Fund are validated and calculated.

Proposed Class Representatives, through Proposed Class Counsel, conducted an extensive investigation of the claims and transactions relating to the Action, vigorously pursued discovery from Defendants and third-parties related to the claims, underlying events, and transactions, and retained two outside separate experts to assist and evaluate the claims. Further, Proposed Class Counsel participated in hard-fought arm’s-length negotiations and two mediation sessions before an experienced mediator prior to entering into the Settlement.

Defendants also vigorously pursued discovery and retained outside experts. Defendants denied and continue to deny all allegations of liability contained in the Complaint and deny that they are liable to the Class. The Settlement should not be seen as an admission or concession on the part of Defendants regarding the truth or validity of the allegations, claims, and/or defenses in the Action, or their fault or liability for alleged damages allegedly suffered by any Class Member.

WHO CAN PARTICIPATE IN THE SETTLEMENT

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

The Court has issued an Order, for the purposes of the Settlement only, that everyone who fits the following description, and is not excluded by definition from the Class (*see* Question 6 below), is a Member of the Class, or a “Class Member,” unless they take steps to exclude themselves:

All persons and entities who owned, either as a record or beneficial owner, one or more shares of Linkwell common stock as of the close of business on September 19, 2014, who did not vote to approve the Merger between Linkwell and Leading

World Corporation, whose shares were canceled as a result of the Merger between Linkwell and Leading World Corporation, and were allegedly damaged thereby.

Receipt of this Notice does not mean that you are a Class Member. Please check your records or contact your broker to see if you owned Linkwell securities as of the close of business on September 19, 2014, and that your shares were canceled as a result of the Merger.

6. Are there exceptions to being included in the Class?

There are some people who are excluded from the Class by definition. Excluded from the Class are Bian, Guan, Sidley and its employees and agents, Yinling, Leading First, Leading World Corporation, and their subsidiaries and affiliates, all Linkwell shareholders who voted to approve the Merger, and all persons who make a timely request to opt out of the Settlement Class.

You are a Class Member only if you (or your broker on your behalf) owned shares of Linkwell common stock as of the close of business on September 19, 2014 and your shares were canceled as a result of the Merger.

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

If you are not sure whether you are included, you can ask for free help by writing to or calling the Claims Administrator: *Linkwell Corp. Securities Litigation*, Claims Administrator, c/o JND Legal Administration, P.O. Box 91211, Seattle, WA 98111-9311, 1-833-285-1327, or www.linkwellcorpshareholderlitigationsettlement.com. Or you can fill out and return the Proof of Claim and Release form (“Proof of Claim”) described in Question 10, to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU MAY RECEIVE

8. What does the Settlement provide?

In the Settlement, Defendants have agreed to pay or cause to be paid \$6,000,000 in cash, which will be deposited in an interest-bearing escrow account for the benefit of the Class (the “Settlement Fund”). The Settlement Fund will be divided, after deduction of Court-awarded attorneys’ fees and expenses, settlement administration costs and any applicable taxes and tax estimates, among all Class Members, as set forth in the Plan of Allocation, who timely submit valid Proofs of Claim that are accepted for payment by the Court (“Authorized Claimants”).

9. How much will my payments be?

The Plan of Allocation, discussed on page 16 below, explains how the Net Settlement Fund will be allocated among owners of Linkwell common stock. Your share of the Net Settlement Fund will depend on several things, including: (i) the number of claims filed by eligible Class Members; and (ii) the country of residence of those Class Members.

After all Class Members wishing to receive a share of the Net Settlement Fund have sent in their Proofs of Claim, the payment any Authorized Claimant will get will be their *pro rata* share of the Net Settlement Fund based on the Plan of Allocation approved by the Court. In general, an Authorized Claimant’s share will be his, her or its number of shares of Linkwell common stock divided by the total number of shares of Linkwell common stock owned by all Authorized Claimants and then multiplied by the total amount in the Net Settlement Fund. **Authorized**

Claimants residing in the United States and its territories shall have their claims valued at the full amount of the claim. Authorized Claimants who do not reside in the United States and its territories, and all Linkwell record shareholders who did not vote to approve the Merger, shall have their claims valued at 40% of the full amount of the claim. See the Plan of Allocation on page 16 below for more information.

HOW YOU GET A PAYMENT – SUBMITTING A PROOF OF CLAIM

10. How can I get a payment?

To qualify for a payment, you must timely mail, or submit online, a valid Proof of Claim and Release (“Proof of Claim”) with supporting documents (DO NOT SEND ORIGINALS of your supporting documents). A Proof of Claim is enclosed with this Notice. You may also get copies of the Proof of Claim on the Internet at the following website: www.linkwellcorpshareholderlitigationsettlement.com. Please read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and mail it to the Claims Administrator by First-Class Mail, **postmarked or submitted online on or before February 4, 2020**. *The Claims Administrator needs all of the information and documents requested in the Proof of Claim in order to determine if you are eligible to receive a distribution from the Net Settlement Fund.*

Any Class Member who fails to timely submit a Proof of Claim shall be barred from receiving any distribution from the Net Settlement Fund or payment pursuant to the Settlement unless, by order of the Court or the discretion of Proposed Class Counsel, late-filed Proofs of Claim are accepted, but shall in all other respects be bound by all the terms of the Settlement, including the terms of the Judgment and all releases provided for herein and therein, and will be permanently barred and enjoined from bringing any action, claim or other proceeding of any kind against any Released Person concerning the Settled Claims.

11. When would I get my payment?

The Court will hold a hearing on **November 19, 2019 at 2 p.m.**, to decide whether to, among other things, approve the Settlement and the proposed Plan of Allocation. All Proofs of Claim must be **postmarked or submitted online** to the Claims Administrator, **on or before February 4, 2020**. If the Court approves the Settlement, there may still be appeals which would delay payment, perhaps for more than several years. It also takes time for all the Proofs of Claim to be processed. Please be patient.

12. What am I giving up by staying in the Class?

Unless you exclude yourself, you will stay in the Class, which means that as of the date that the Settlement becomes effective under the terms of the Stipulation (the “Effective Date”), you will forever give up and release all “Settled Claims” (as defined below) against the “Released Parties” (as defined below). You will not in the future be able to bring a case asserting any Settled Claim against any Released Parties.

(a) “Settled Claims” means any and all claims, debts, demands, rights, losses, damages, causes of action or liabilities, of every nature and description whatsoever arising from the beginning of time through the Effective Date, whether fixed or contingent, accrued or unaccrued, liquidated or

unliquidated, based in law or equity, or based on any foreign, federal, state, local, statutory or common law, or any other law, rule or regulation (including any claims for violations of Fed. R. Civ. P. 11), including both known claims and Unknown Claims that have been or could have been asserted in any forum by any Class Member, on behalf of themselves and any other legal or natural persons and entities who or which may claim by, through or under them, including their executors, administrators, heirs, assigns, privies, predecessors and successors, whether directly, indirectly, derivatively, representatively or in any other capacity against any of the Released Parties, which arise out of, relate to, or are based upon, in any way, directly or indirectly (a) the claims, allegations, transactions, facts, events, matters, occurrences, acts, representations or omissions involved, set forth, or referred to, or that could have been asserted in the Action, or (b) the purchase, sale, or cancellation of Linkwell securities by any Class Member. For the avoidance of doubt, the Settled Claims do not include claims to enforce the Settlement, if approved by the Court.

(b) “Released Parties” means the Settling Defendants and includes their directors, officers, employees, agents, consultants, attorneys, partners, associates, insurers, reinsurers, personal representatives, spouses, issues, heirs, executors, administrators, predecessors, successors, assigns, and affiliates. The Released Parties are express third-party beneficiaries of the Stipulation.

(c) “Unknown Claims” means any and all Settled Claims that any Class Member does not know or suspect to exist in his, her or its favor at the time of the release of the Released Parties, which if known by him, her, or it might have affected his, her or its decision(s) with respect to the Settlement. With respect to any and all Settled Claims, each Class Member acting through Proposed Class Counsel, shall each, for themselves and all persons claiming by, through, or on behalf of them, be deemed to have waived, and by operation of the Final Judgment and Order shall have expressly waived, any and all provisions, rights and benefits conferred by any law of any state or territory of the United States, or principle of common law, that is similar, comparable, or equivalent to Cal. Civ. Code § 1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Proposed Class Representatives, other Class Members or Defendants may hereafter discover facts in addition to or different from those which he, she, or it now know or believes to be true with respect to the subject matter of the Settled Claims, but hereby stipulates and agrees that Proposed Class Representatives, and each releasing person, shall be deemed to settle and release, and upon the Effective Date and by operation of the Order and Final Judgment shall have settled and released, fully, finally, and forever, and all Settled Claims against Released Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or which heretofore existed upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct that is negligent or intentional and with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep any right you may have to sue the Released Parties on your own about the Settled Claims, then you must take steps to exclude yourself from the Class. Excluding yourself is known as “opting out” of the Class. Defendants may withdraw from and terminate the Settlement if potential Class Members who owned shares of Linkwell common stock as of the close of business on September 19, 2014 and whose shares were canceled as a result of the Merger opt out from the Class in an amount in excess of 5% of the Class.

If you timely and properly request exclusion from the Class, you will retain any rights you have to sue Defendants yourself with respect to the Settled Claims to the extent those claims are viable under the applicable statute of limitations. You should note that if you exclude yourself from the Class, you may forfeit any claims you may have against Defendants relating to your ownership of Linkwell securities as of the close of business on September 19, 2014 if you fail to act in a proper and timely manner under the applicable statutes of limitation and repose. Before you decide to request exclusion from the Class, you are urged to consult with an attorney, at your own expense, to fully evaluate your rights and the consequences of excluding yourself from the Class.

13. How do I “opt out” (exclude myself) from the Settlement?

To “opt out” (exclude yourself) from the Class, you must deliver or mail a signed letter by First-Class Mail stating that you “request exclusion from the Class in *Julie Siegmund and Seth Lipner as Co-Successor Trustees of The Frederick Siegmund Linkwell Corp. Claims Living Trust dated July 31, 2018 v. Xuelian Bian, et al.*, Civil Action No. 0:16-cv-62506-FAM (S.D. Fla.)” Your letter **must** state the number of shares of Linkwell common stock you owned as of the close of business on September 19, 2014 and that your shares were cancelled as a result of the Merger. This information is needed to determine whether you are a Class Member. In addition, you must include your name, address, telephone number, and your signature. You must submit your request for exclusion addressed to *Linkwell Corp. Securities Litigation, EXCLUSIONS*, c/o JND Legal Administration, P.O. Box 91211, Seattle, WA 98111-9311. The request for exclusion must be **received on or before October 21, 2019. You cannot exclude yourself or opt out by telephone or by email.** Your request for exclusion must comply with these requirements in order to be valid. If you are excluded, you will not be eligible to get any payment from the Settlement proceeds and you cannot object to the Settlement, the proposed Plan of Allocation or the application for attorneys’ fees and expenses.

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

No. Unless you exclude yourself, you give up any rights you may have to sue Defendants for all Settled Claims. If you have a pending lawsuit against any of the Defendants, speak to your lawyer in that case **immediately**. You must exclude yourself from this Class to continue your own lawsuit. Remember, the exclusion deadline is **October 21, 2019**.

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

No. If you exclude yourself, do not send in a Proof of Claim to ask for any money, as any such Proof of Claim will be rejected.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

The law firm of Wolf Haldenstein Adler Freeman & Herz LLP (“Proposed Class Counsel”) will move to be appointed as Class Counsel to represent all Class Members. You will not be separately charged for the services of these lawyers. The Court will determine the amount of attorney’s fees and expenses, if any, to be paid to Proposed Class Counsel. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Proposed Class Counsel have not received any payment for their services in pursuing the claims against the Defendants on behalf of the Class since the Action was commenced in 2016, nor have they been paid to this point for any of their litigation expenses. At the Settlement Hearing described below, or at such other time as the Court may order, Proposed Class Counsel will ask the Court to award them, from the Settlement Fund, attorneys’ fees of no more than 35% of the Settlement Amount and litigation expenses that they have incurred in pursuing the Action in an amount not to exceed \$450,000, plus interest on both amounts from the date of funding at the same rate earned by the Settlement Fund. Proposed Class Counsel will also request an award to The Siegmund Trust for the reimbursement of its reasonable costs and expenses (including lost wages) directly related to its representation of the Class, in an amount not to exceed \$15,000, pursuant to the PSLRA.

OBJECTING TO THE SETTLEMENT

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

If you are a Class Member and do not exclude yourself (opt out) in accordance with Question 13 above, you can object to any part of the Settlement, the proposed Plan of Allocation, and/or the application by Proposed Class Counsel for attorneys’ fees and expenses and request for an award to the Siegmund Trust. You must write to the Court setting out your objection, giving reasons why you think the Court should not approve any part or all of the Settlement, the proposed Plan of Allocation, or the attorneys’ fee and expense request.

To object, you must send a signed letter stating that you object to the Settlement in the case known as: *Julie Siegmund and Seth Lipner as Co-Successor Trustees of The Frederick Siegmund Linkwell Corp. Clams Living Trust dated July 31, 2018 v. Xuelian Bian, et al.*, Civil Action No. 0:16-cv-62506-FAM (S.D. Fla.). You must include your name, address, telephone number and your signature; include documents sufficient to prove your membership in the Class, such as the number of Linkwell securities owned as of the close of business on September 19, 2014 and the cancellation of those securities as a result of the Merger. Your letter must also state the specific reasons why you object to the Settlement, the proposed Plan of Allocation, the attorneys’ fee and expense request, or award request, including any legal or evidentiary support for your objection.

Unless otherwise ordered by the Court, any Class Member who does not object in the manner described in this Notice will be deemed to have waived any objection and will not be able to appear separately at the Fairness Hearing or to make any objection to the Settlement, the proposed Plan of Allocation, the application for attorneys’ fees and expenses, and/or award request. If you elect

to “opt out,” you will not be entitled to share in the Settlement proceeds and will not have a right to make an objection to the Settlement, proposed Plan of Allocation, the application for attorneys’ fees and expenses, or award request.

Your objection must be filed with the United States District Court for the Southern District of Florida by hand or by mail such that it is **received on or before October 29, 2019**, at the address set forth below. You must also serve the papers on Proposed Class Counsel and Defendants’ Counsel at the addresses set forth below so that the papers are **received on or before October 29, 2019**.

COURT:	PROPOSED CLASS COUNSEL:
Clerk of the Court United States District Court Southern District of Florida United States Courthouse Wilkie D. Ferguson, Jr. Building 400 North Miami Avenue Miami, FL 33128	Charles J. Hecht, Esq. Wolf Haldenstein Adler Freeman & Herz LLP 270 Madison Avenue New York, NY 10016
DESIGNATED COUNSEL FOR XUELIAN BIAN AND WEI GUAN:	DESIGNATED COUNSEL FOR SIDLEY:
Alice K. Sum, Esq. Fowler White Burnett, P.A. Brickell Arch 1395 Brickell Avenue, 14th Floor Miami, FL 33131	Stephen Warren, Esq. Holland & Knight LLP 701 Brickell Avenue Suite 3300 Miami, FL 33131

19. What is the difference between objecting and requesting exclusion?

Objecting is simply telling the Court that you do not like something about the Settlement. You can still recover from the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no right to object because the Action no longer affects you and you are no longer a Member of the Class.

THE COURT’S SETTLEMENT HEARING

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

The Court will hold a Fairness Hearing **at 2 p.m. on November 19, 2019**, in the United States District Court for the Southern District of Florida, United States Courthouse, Wilkie D. Ferguson, Jr. Building, 400 North Miami Avenue, Miami, FL 33128. At this hearing, the Court will consider whether the Settlement is fair, reasonable and adequate. The Court also will consider the proposed Plan of Allocation for the proceeds of the Settlement and Proposed Class Counsel’s application for attorneys’ fees and expenses. The Court will take into consideration any written objections

filed in accordance with the instructions set out above in the answer to Question 18. We do not know how long it will take the Court to make these decisions.

You should also be aware that the Court may change the date and time of the Fairness Hearing without another notice being sent to Class Members. If you want to come to the hearing, you should check with Proposed Class Counsel before coming to be sure that the date and/or time has not changed.

21. Do I have to come to the hearing?

No. Proposed Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you validly submit an objection, as set forth in Question 18, it will be considered by the Court. You do not have to come to Court to talk about it.

22. May I speak at the hearing and submit additional evidence?

If you file an objection, you may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include with your objection (*see* Question 18 above) a statement that it is your “notice of intention to appear in *Julie Siegmund and Seth Lipner as Co-Successor Trustees of The Frederick Siegmund Linkwell Corp. Clams Living Trust dated July 31, 2018 v. Xuelian Bian, et al.*, Civil Action No. 0:16-cv-62506-FAM (S.D. Fla.)” Persons who object and want to present evidence at the Fairness Hearing must also include in their written objection the identity of any witness they may call to testify and exhibits they intend to introduce at the Fairness Hearing. You cannot speak at the hearing if you exclude yourself from the Class or if you have not provided written notice of your intention to speak at the Fairness Hearing according to the procedures described above and in the answer to Question 18.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will get no money from this Settlement and you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants about the Settled Claims in this case. To be eligible to share in the Net Settlement Fund you must submit a Proof of Claim (*see* Question 10). To start, continue or be a part of any other lawsuit against Defendants about the Settled Claims in this case you must exclude yourself from the Class (*see* Question 13).

GETTING MORE INFORMATION

24. Are there more details about the Settlement and the Action?

This Notice summarizes the proposed Settlement. More details are in the Stipulation. You may review the Stipulation filed with the Court and all documents filed in the Action during business hours at the Office of the Clerk of the United States District Court for the Southern District of Florida, United States Courthouse, Wilkie D. Ferguson, Jr. Building, 400 North Miami Avenue, Miami, FL 33128.

You also can call the Claims Administrator at: 1-833-285-1327; call Proposed Class Counsel Wolf Haldenstein Adler Freeman & Herz LLP: 1-212-545-4600; write to *Linkwell Corp. Securities Litigation*, Claims Administrator, c/o JND Legal Administration, P.O. Box 91211, Seattle, WA 98111-9311; or visit the website www.linkwellcorpshareholderlitigationsettlement.com, where you can download copies of this Notice and the Proof of Claim. Please do not call the Court, the Defendants or their counsel with questions about the Settlement.

PLAN OF ALLOCATION OF NET SETTLEMENT FUND

The Net Settlement Fund will be distributed to Class Members who, in accordance with the terms of the Stipulation, are entitled to a distribution from the Net Settlement Fund pursuant to any Plan of Allocation or any order of the Court and who submit a valid and timely Proof of Claim under the Plan of Allocation described below.

For each share of Linkwell common stock canceled as a result of the Merger, each Authorized Claimant will receive his, her, or its pro rata share of the Net Settlement Fund.

The pro rata share shall be calculated from the total number of shares of Linkwell common stock an Authorized Claimant owned as of the close of business on September 19, 2014 and canceled as a result of the Merger, divided by the total number of shares of Linkwell common stock owned by all Authorized Claimants, and then multiplied by the total amount in the Net Settlement Fund.

Authorized Claimants residing in the United States and its territories, except for Linkwell record shareholders who did not vote to approve the Merger, shall have their claims valued at the full amount of the claim.

Authorized Claimants that do not reside in the United States and its territories, and all Linkwell record shareholders who did not vote to approve the Merger, shall have their claims valued at 40% of the full amount of the claim.

The Net Settlement Fund shall be distributed pro rata to all Authorized Claimants entitled to receive payment.

Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, shall be conclusive against all Authorized Claimants. No person shall have any claim against Proposed Class Representatives, Proposed Class Counsel, Defendants, Defendants' counsel or any of the other Released Parties, or the Claims Administrator or other agent designated by Proposed Lead Counsel arising from distribution made substantially in accordance with the Settlement Agreement, the Plan of Allocation approved by the Court, or further Orders of the Court. Proposed Class Representatives, Defendants and their respective counsel, and all other Released Parties, shall have no responsibility or liability whatsoever for the investment or distribution of the Settlement Fund or the Net Settlement Fund; the Plan of Allocation; the determination, administration, calculation or payment of any Claim Form or non-performance of the Claims Administrator; the payment or withholding of taxes; or any losses incurred in connection therewith.

The Plan of Allocation set forth herein is the plan that is being proposed to the Court for its approval by Proposed Class Counsel after consultation with their damages expert. The Court may approve the Plan of Allocation as proposed or may modify it without further notice to the Class. Any Orders regarding any modification of the Plan of Allocation will be posted on the settlement website.

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

25. What if I held Linkwell stock on someone else's behalf?

If you held Linkwell securities as of the close of business on September 19, 2014 for the beneficial interest of a person or organization other than yourself and those securities were canceled as a result of the Merger, the Court has directed that you either: (a) within ten (10) business days of your receipt of this notice, request additional copies of this Notice and the Proof of Claim form, which will be provided to you free of charge, and within ten (10) business days of receipt of such copies send them by First-Class Mail, postage prepaid, directly to the beneficial owners of those shares of Linkwell common stock; or (b) within ten (10) calendar days of your receipt of this notice, provide to the Claims Administrator the name and last known address of each person or organization for whom or which you purchased or otherwise acquired Linkwell common stock during the Class Period (preferably in an MS Excel, .CSV, or .TXT format), setting forth (i) title/registration, (ii) street address, and (iii) city/state/zip.

If you choose to follow alternative procedure (a), the Court has directed that, upon such mailing, you shall send a statement to the Claims Administrator confirming that the mailing was made as directed. You are entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expenses and the cost of ascertaining the names and addresses of beneficial owners. Those expenses will be paid after request and submission of appropriate supporting documentation. All communications concerning the foregoing should be addressed to the Claims Administrator:

Linkwell Corp. Securities Litigation
c/o JND Legal Administration
P.O. Box 91211
Seattle, WA 98111-9311
1-833-285-1327

www.linkwellcorpshareholderlitigationsettlement.com
info@linkwellcorpshareholderlitigationsettlement.com

PLEASE DO NOT CONTACT THE COURT FOR INFORMATION OR QUESTIONS ABOUT THE TERMS OF THE SETTLEMENT. INSTEAD, PLEASE DIRECT ALL QUESTIONS TO PROPOSED CLASS COUNSEL AND/OR THE CLAIMS ADMINISTRATOR, AS DIRECTED IN QUESTION 24 ABOVE.