## IN RE VIVENDI UNIVERSAL, S.A. SECURITIES LITIGATION

Civil Action No. 02 Civ. 5571 (SAS/HBP)

# NOTICE TO CLASS MEMBER CLAIMANTS OF MOTION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

To eligible Class Member claimants in the above-captioned action ("Action") who have submitted claims for damages pursuant to the January 29, 2010 jury verdict in favor of the Class, as subsequently modified by the Court, finding Vivendi liable for damages to eligible persons and entities that purchased or otherwise acquired Vivendi American depository shares (ADSs) between October 30, 2000 and August 14, 2002. The notice concerning the filing of claims was disseminated to Class members in December 2012. That notice and other documents and information concerning the Action may be viewed at www.vivendiclassaction.com.

#### **Background**

This Notice has been ordered by the Court to provide important information concerning the motion by Plaintiffs' Lead Counsel for an award of attorneys' fees and reimbursement of reasonable expenses incurred to date in the prosecution of the Action ("Motion").

You are receiving this notice ("Notice") only if you are a Class Member who submitted a claim or claims for yourself or for beneficial owners for whom you acted, and one or more of those claims was initially approved by the Claims Administrator ("Eligible Claimant"). Subsequently, those initially approved claims were either approved by the Court pursuant to a judgment entered on December 22, 2014, rejected pursuant to a decision of the Court dated August 11, 2015, or may be approved or rejected by the Court for other reasons. If you are a custodian or representative who filed a claim on behalf of the person or entity that owned the Vivendi ADSs, please transmit this Notice expeditiously to that person or entity.

The final approval or denial of each Class Members' claim(s) remains subject to appeal by Plaintiffs and Defendant Vivendi, and the final status of any such claim will not be established until all appeals have been decided and judgments approving or rejecting claims are final.

### The Motion and Eligible Claimants' Right to Be Heard

Plaintiffs' Lead Counsel will file papers in support of the Motion on or before April 15, 2016. The Court intends to decide the Motion based on the written submissions of the parties and any written submissions by Eligible Claimants under the procedure described below. You should read this notice carefully, as it describes the terms of Plaintiffs' request for payment of fees and expenses that will reduce the amount of damages you may receive in the event your claim is finally approved and paid, and it describes your right to object to the request made in the Motion and the required procedure for such objection.

The Motion will request approval by the Court of (a) reimbursement of litigation expenses paid or incurred to date in the prosecution of the action, in the amount of approximately \$23.5 million and (b) attorneys' fees in an amount equal to one-third (33 1/3 percent) of the total value of damages paid to all Eligible Claimants, after payment of reimbursed expenses awarded by the Court. The Motion will be filed with the Court by April 15, 2016. You can view the Motion at www.vivendiclassaction.com or by visiting the office of the Clerk of Court. All fees and expenses awarded by the Court will be charged pro-rata to each Eligible Claimant's damage payment, prior to distribution. The payment of any fees or reimbursement of expenses to Counsel is conditioned upon the judgement(s) of this Court becoming final.

If you are an Eligible Claimant who receives this Notice, you need do nothing further to support your claim(s) unless you receive a separate specific request from the Claims Administrator.

If you wish to be heard regarding the Motion, you must submit any objections or comments concerning Plaintiffs' Lead Counsel's request for fees and reimbursement of expenses by April 22, 2016. Your submission may be sent either by mail, email or telecopier but must be *received* by the Claims Administrator by the April 22nd deadline. The submission should be sent to:

Vivendi Securities Class Action c/o Garden City Group

Address: P.O Box 9250, Dublin, Ohio 43017-4650, or

Email address: questions@vivendiclassaction.com, or

Fax number: (855) 409-7015.

#### **Further Information**

Please DO NOT CONTACT THE COURT. All further questions or information about this Notice should be addressed to the Claims Administrator at the toll free Vivendi Class Action number- (800) 767-2840.