

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ELLIOTT M. FOX,	)	Case No. BC344364
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
-and-	)	Assigned to: Hon. John Shepard Wiley, Jr.
	)	
NECA-IBEW PENSION FUND (THE DECATUR PLAN),	)	
On Behalf of Itself and All Others Similarly Situated,	)	
	)	
Plaintiff-Intervener,	)	
	)	
vs.	)	
	)	
JAMDAT MOBILE, INC., et al.,	)	
	)	
Defendants.	)	

NOTICE OF SETTLEMENT OF CLASS ACTION

IF YOU HELD JAMDAT MOBILE, INC. ("JAMDAT") COMMON STOCK AS OF DECEMBER 8, 2005 AND HELD YOUR SHARES THROUGH FEBRUARY 15, 2006, THE DATE OF THE CONSUMMATION OF THE ACQUISITION OF JAMDAT BY ELECTRONIC ARTS INC. ("EA") AT THE PRICE OF \$27.00 PER SHARE YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF A CLASS ACTION.

The Superior Court of the State of California for the County of Los Angeles (the "Court") authorized this Notice. This is not a solicitation from a lawyer.

- The settlement resolves a lawsuit alleging that the members of JAMDAT's board of directors (Defendants J. William Gurley, Mitch Lasky, Michael M. Lynton, Henk B. Rogers, and Paul A. Vais) breached their fiduciary duties to the shareholders of JAMDAT in connection with the February 15, 2006 acquisition of JAMDAT by EA at the price of \$27.00 per share (the "Acquisition"). The suit includes claims that the disclosures concerning the Acquisition were deficient, that the directors (except for Mr. Lynton) were interested in the transaction, and that the Acquisition price was inadequate. Defendants have denied, and continue to deny, those claims and allegations.
- The settlement, which has been agreed to by both sides to avoid the cost and risk of continued litigation, provides for the payment of \$4,750,000 by Defendants' insurers for the benefit of all Persons who held JAMDAT common stock as of December 8, 2005 and who held such shares through February 15, 2006, the date of the consummation of the Acquisition of JAMDAT by EA for \$27.00 per share, excluding Defendants and any Person, firm, trust, corporation or other entity related to or affiliated with any Defendant. Your recovery will depend on the number of eligible shares of common stock held by other Class Members that participate in the settlement by filing valid Proof of Claim and Release forms ("Proof of Claim").
- Class Plaintiff believes that the settlement provides a substantial recovery now and avoids the costs and risks associated with continued litigation, including the danger of no recovery for the Class.
- Plaintiffs' Counsel have not received any payment for conducting this lawsuit and negotiating the settlement on behalf of the Class. Plaintiffs' Counsel will ask the Court for attorneys' fees of 27% of the Settlement Fund and payment of expenses not to exceed \$200,000 to be paid from the Settlement Fund.
- Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

DO NOTHING	Get no payment. Give up your rights.
SUBMIT A CLAIM FORM	The only way to get a payment.
OBJECT	You may write to the Court if you do not like the settlement, the Plan of Allocation or counsel's request for an award of attorneys' fees and expenses or service award.
GO TO THE HEARING	You may ask to speak in Court about the fairness of the settlement.

- These rights and options — **and the deadlines to exercise them** — are explained in this Notice.
- The Court in charge of this case must decide whether to approve the settlement. Payments will be made if the Court approves the settlement and after any appeals are resolved. Please be patient.

BASIC INFORMATION

1. Why Did I Get This Notice?

You or someone in your family may have held shares of JAMDAT common stock as of December 8, 2005 and held those shares through February 15, 2006, the date of the consummation of the Acquisition.

The Court directed that this Notice be sent to you because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement.

This Notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Los Angeles Superior Court (the "Court"), and the case is entitled *Fox v. JAMDAT Mobile, Inc., et al.*, Case No. BC344364 (the "Litigation"). The case is assigned to the Honorable John Shepard Wiley, Jr.

2. What Is This Lawsuit About?

This Litigation arises from the acquisition of JAMDAT by EA at the price of \$27.00 per share. The Acquisition was completed on February 15, 2006. The Litigation seeks relief based on the allegations that actions taken by Defendants in connection with the Acquisition constituted a breach of the fiduciary duties owed to the Class by the Defendants, including the claims that Defendants failed to maximize shareholder value and that the issuance of statements in connection with the Acquisition were materially false and misleading. Defendants have denied and continue to deny all charges of wrongdoing and liability, and further deny that Class Members have suffered damage or were harmed by the conduct alleged in the lawsuit.

3. Why Is This a Class Action?

In a class action, one or more people or entities called class representatives or plaintiffs (in this case the Court appointed NECA-IBEW Pension Fund (The Decatur Plan) to represent the Class who is sometimes referred to as "Class Plaintiff") sue on behalf of people and entities who have similar claims. Here, all these people and entities are called a Class or Class Members. One court resolves the issues for all Class Members. The people sued are called Defendants.

4. Why Is There a Settlement?

The Court did not decide in favor of Class Plaintiff or Defendants. Instead, both sides agreed to a settlement, thereby avoiding the cost and risk of continued litigation, including a trial and possible appeals. Class Plaintiff and its attorneys believe the settlement is in the best interest of the Class.

5. How Do I Know if I Am Part of the Settlement?

The Class includes all Persons (other than those Persons who timely and validly requested exclusion from the Class) who were holders of JAMDAT common stock as of December 8, 2005 and who held their shares through the date of the consummation of the Acquisition on February 15, 2006 by EA at a price of \$27.00 per share. Excluded from the Class are Defendants and any Person, firm, trust, corporation or other entity related to or affiliated with any Defendant.

6. What if I Am Still Not Sure if I Am Included?

If you are still not sure if you are included, you can ask for free help. You can call Rick Nelson at 1-800-449-4900 for more information or you can fill out and return the claim form described in Question 9 to see if you qualify.

THE SETTLEMENT BENEFITS

7. What Does the Settlement Provide?

The parties have agreed that \$4,750,000 in cash will be paid by Defendants' insurers to be divided among Class Members who send in valid claim forms, after payment of Court-approved attorneys' fees and expenses and service award, the costs of settlement administration, including the costs of printing and mailing this Notice, processing claims, and the costs of publishing newspaper notice, and any taxes (the "Net Settlement Fund").

THE PLAN OF ALLOCATION

8. How Much Will My Payment Be?

Your share of the fund will depend on the total number of shares represented by valid Proofs of Claim that Class Members send in and how many shares of JAMDAT common stock you held as of December 8, 2005 through February 15, 2006, the date of the consummation of the Acquisition of JAMDAT by EA at the price of \$27.00 per share. For each share of JAMDAT common stock you held as of December 8, 2005 and continued to hold through February 15, 2006, you will receive a *pro rata* share of the Net Settlement Fund based on the total number of shares represented by Class Members who submit valid claim forms.

HOW YOU CAN GET A PAYMENT – SUBMITTING A CLAIM FORM

9. How Can I Get a Payment?

To qualify for a payment, you must send in a Proof of Claim. A Proof of Claim is enclosed with this Notice. You may also get a Proof of Claim on the Internet at www.gilardi.com. Read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and mail it in the enclosed envelope postmarked no later than February 6, 2012, to the address listed on the claim form.

10. When Would I Get My Payment?

The Court will hold a hearing on January 10, 2012, to decide whether to approve the settlement. If the Court approves the settlement, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. It also takes time for all the Proofs of Claim to be processed. Please be patient.

THE LAWYERS REPRESENTING YOU

11. Do I Have a Lawyer in This Case?

The law firms of Robbins Geller Rudman & Dowd LLP and Cavanagh & O'Hara are representing Class Plaintiff and the Class. These lawyers are called Plaintiffs' Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. How Will the Lawyers Be Paid?

Plaintiffs' Counsel will ask the Court for an award of attorneys' fees of 27% of the Settlement Fund and expenses of up to \$200,000 incurred in connection with prosecuting the Litigation, plus interest on such fees and expenses at the same rate as earned by the Settlement Fund. Any such award of attorneys' fees and expenses will be paid out of the Settlement Fund. Class Members are not personally liable for any such fees or expenses. To date, Plaintiffs' Counsel have not been paid for their services for conducting this Litigation on behalf of the Class Plaintiff and the Class nor for their substantial expenses. The fee requested will compensate Plaintiffs' Counsel for their work in achieving the Settlement Fund. The Court may award less than this amount.

OBJECTING TO THE SETTLEMENT

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

13. How Do I Tell the Court that I Do Not Like the Settlement?

If you are a Class Member, you can object to the settlement if you do not like any part of it, including the proposed distribution of the Net Settlement Fund to Class Members (see Question 8), and/or you can also object to Plaintiffs' Counsel's request for an award of attorneys' fees and expenses. You can give reasons why you think the Court should not approve the settlement or counsel's request for attorneys' fees and expenses or the service award to Class Plaintiff. The Court will consider your views. To object, you must send a letter saying that you object and the reasons why you object. Be sure to include your name, address, telephone number, your signature, and the number of shares of JAMDAT common stock that you held on December 8, 2005 and continued to hold through February 15, 2006, the date of the closing of the Acquisition. Mail the objection to the following places such that it is received no later than December 23, 2011, by each of the following:

Court:

Clerk of the Court
LOS ANGELES SUPERIOR COURT
CENTRAL CIVIL WEST COURTHOUSE
600 South Commonwealth Avenue, Room 314
Los Angeles, CA 90005

Attorneys for Class Plaintiff:

Jeffrey D. Light
ROBBINS GELLER RUDMAN & DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Attorneys for Defendants:

Kevin P. Muck
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you don't have to.

14. When and Where Will the Court Decide Whether to Approve the Settlement?

The Court will hold a settlement hearing at 11:00 a.m., on January 10, 2012, before the Honorable John Shepard Wiley, Jr. at the Los Angeles County Superior Court, Central Civil West Courthouse, 600 South Commonwealth Avenue, Los Angeles, CA 90005. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court will also consider how much to pay Plaintiffs' Counsel. We do not know how long

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

15. Do I Have to Come to the Hearing?

No. Plaintiffs' Counsel will answer questions the Court may have. But, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

16. May I Speak at the Hearing?

You may ask the Court for permission to speak at the settlement hearing. To do so, you must send a letter saying that it is your intention to appear in *Fox v. JAMDAT Mobile, Inc., et al.*, Case No. BC344364. Be sure to include your name, address, telephone number, and your signature. Your notice of intention to appear must be received no later than December 23, 2011, by the Clerk of the Court, Plaintiffs' Counsel, and Defendants' counsel, at the addresses listed in the answer to Question 13.

GETTING MORE INFORMATION

17. Are There More Details About the Settlement?

This Notice summarizes the proposed settlement. More details are in the Stipulation of Settlement dated as of October 14, 2011 ("Stipulation"). You can get a copy of the Stipulation during business hours at the Clerk of the Court, Los Angeles County Superior Court, Central Civil West Courthouse, 600 South Commonwealth Avenue, Room 314, Los Angeles, CA 90005, or by calling or writing to Rick Nelson, c/o Shareholder Relations, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, telephone 1-800-449-4900. The Stipulation, this Notice, and the Proof of Claim may also be viewed and/or downloaded at www.gilardi.com.

18. How Do I Get More Information?

You can call 1-800-449-4900 or write to Rick Nelson, c/o Shareholder Relations, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101.

SPECIAL NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES

If you held any JAMDAT common stock as of December 8, 2005, and held such shares through February 15, 2006 for a beneficial owner, then, within ten (10) calendar days after you receive this Notice, you must either: (1) send a copy of this Notice by first class mail to all such persons or entities; or (2) provide a list of the names and addresses of such persons or entities to the Claims Administrator:

JAMDAT Shareholder Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

If you choose to mail the Notice 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 or advancement of reasonable administrative costs actually incurred or expected to be incurred in connection with forwarding the Notice and which would not have been incurred but for the obligation to forward the Notice, upon submission of appropriate documentation to the Claims Administrator.

PLEASE DO NOT TELEPHONE THE COURT REGARDING THIS NOTICE

DATED: October 25, 2011

BY ORDER OF THE SUPERIOR COURT
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES