

EXHIBIT A-2

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF IDAHO**

HONGBO SHAO, et al.,

Plaintiffs,

v.

SEROFIM MUROFF, et al.,

Defendants.

Case No. 1:18-cv-00295-BLW

**SUMMARY NOTICE OF PENDENCY
AND PROPOSED PARTIAL SETTLEMENT
OF CLASS ACTION**

TO: ALL PERSONS WHO PURCHASED OR OTHERWISE ACQUIRED MEMBER INTERESTS IN BLACKHAWK GOLD, LLC BETWEEN JANUARY 1, 2010 THROUGH DECEMBER 31, 2021

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of Idaho, that a hearing will be held on January 10, 2023, at 3:30 p.m. (Mountain Time) before the Honorable B. Lynn Winmill, United States District Judge of the District of Idaho, via Zoom (the “Settlement Hearing”) for the purpose of determining: (1) whether the Partial Settlement is fair, reasonable, and adequate and whether to approve the Partial Settlement; and (2) whether the Civil Action should be dismissed with prejudice as to the Settling Defendants.

If you purchased or otherwise acquired Member Interests in Blackhawk Gold, LLC (“Blackhawk Gold”) between January 1, 2010 through December 31, 2021 (“Class Period”), your rights may be affected by the Partial Settlement of this action. If you have not received a detailed Notice of Pendency and Proposed Settlement of Class Action (“Notice”), you may obtain copies by writing to Counsel for Plaintiffs (see below), or going to the website blackhawkgoldllc.com. Unless you submit a written exclusion request, you will be bound by any judgment rendered in the Civil Action whether or not you make a claim. If you desire to be

excluded from the Class, you must submit a request for exclusion received no later than October 10, 2022, in the manner and form explained in the detailed Notice.

Any objection to the Partial Settlement must be in the manner and form explained in the detailed Notice and received no later than October 10, 2022, to each of the following:

Clerk of the Court

United States District Court
District of Idaho
550 W. Fort St., Suite 400
Boise, ID 83724

Counsel for Plaintiffs:

Walter H. Bithell
BITHELL LAW
199 N Capitol Blvd, Suite 500
Boise, ID 83702
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Email: walter@bithelllaw.com

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Kylie L. Madsen
JOHNSON MAY
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Boise, Idaho 83702
Telephone: (208) 384-8588
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kylie@johnsonmay.com

Counsel for Settling Defendant Blackhawk Manager LLC:

Sean T. Prosser
MINTZ LEVIN COHN FERRIS GLOVSKY & POPEO, P.C.
3580 Carmel Mountain Road, Suite 300
San Diego, CA 92130
Telephone: 858.314.2152
Email: STProsser@mintz.com

Counsel for Settling Defendants Serofim Muroff and Equity Recap Account, LLC:

Eric Swartz
JONES & SWARTZ LLC
623 West Hays Street
Boise, ID 83702
Telephone: 208.489.8989
Email: eric@jonesandswartzlaw.com

If you have any questions about the Partial Settlement, you may call or write to Class Counsel.

**PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE
REGARDING THIS NOTICE.**