

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA**

In re McAFEE, INC. SHAREHOLDER LITIGATION )	Lead Case No. 1:10-cv-180413
)	
Consolidated action, including: )	<u>CLASS ACTION</u>
<i>Greenberg v. McAfee, Inc.</i> , Santa Clara County )	
Superior Court, Case No. 1:10-cv-180413 <i>Colwell</i> )	Judge: Hon. James P. Kleinberg
<i>v. McAfee, Inc.</i> , Santa Clara County Superior )	Dept: 1-C
Court, Case No. 1:10-cv-180420 <i>Faulkner v.</i> )	
<i>McAfee, Inc.</i> , Santa Clara County Superior Court, )	
Case No. 1:10-cv-180597 <i>Korsinsky v. Bass</i> , Santa )	
Clara County Superior Court, Case No. 1:10-cv- )	
180928 )	
)	
_____ )	
)	
This Document Relates To: )	
)	
ALL ACTIONS. )	
)	
)	
_____ )	

**NOTICE OF PENDENCY OF CLASS ACTION (TO PLAINTIFF CLASS)**

TO: ALL HOLDERS OF McAFEE, INC. COMMON STOCK WHO EXCHANGED THEIR SHARES FOR CONSIDERATION IN THE ACQUISITION OF McAFEE, INC. BY INTEL CORPORATION AT THE PRICE OF \$48.00 PER SHARE:

1. This Notice is given pursuant to §382 of the California Code of Civil Procedure and pursuant to an Order of the Superior Court of California, County of Santa Clara (the "Court"). The purpose of this Notice is to inform you of the pendency of this lawsuit, how it may affect your rights, and what steps you may take in relation to it. This Notice is not an expression of any opinion by the Court as to the merits of any of the claims or defenses asserted by any party in this litigation.

2. A class action lawsuit is a lawsuit in which one or more persons sue on behalf of themselves and others who have similar claims. This litigation is a class action filed on behalf of holders of McAfee, Inc. ("McAfee" or the "Company") common stock who exchanged their shares for consideration in the acquisition of McAfee by Intel Corporation ("Intel") at the price of \$48.00 per share (collectively, "Defendants").

3. Plaintiff Central Laborers' Pension Fund's Complaint in Intervention For Breaches of Fiduciary Duties and Violations of State Law (the "Complaint") alleges that Defendants, the former directors of McAfee, breached their fiduciary duties of loyalty, good faith, and full disclosure owed to the shareholders of McAfee in connection with the sale of McAfee to Intel (the "Acquisition"), by engaging in self-interested conduct to the detriment of McAfee's shareholders at large, failing to maximize shareholder value, and issuing statements and documents to the public in connection with the Acquisition which are alleged to contain materially false and misleading information and material omissions. McAfee and Intel are alleged to have aided and abetted the former McAfee directors' breaches of fiduciary duty. Defendants have filed answers denying all material allegations of Plaintiff's Complaint and have asserted affirmative defenses thereto.

4. On January 13, 2012, after discovery, full briefing and argument, the Court granted Plaintiffs' Motion for Class Certification and determined that this action may be maintained as a class action with respect to claims asserted on behalf of the Class, as defined as:

All holders of McAfee common stock who exchanged their shares for consideration in the acquisition of McAfee by Intel Corporation at the price of \$48.00 per share. Excluded from the Class are defendants and any person, firm, trust, corporation or other entity related to or affiliated with any defendant.<sup>1</sup>

5. All nominees who were holders of McAfee common stock who exchanged their shares for consideration in the acquisition of McAfee by Intel at the price of \$48.00 per share, are requested to send this Notice to all such beneficial owners no later than 10 days after receipt of this Notice. Additional copies of this Notice with postage prepaid will be provided to such nominees upon written request sent to the address identified in Paragraph 4 below. In the alternative, all nominees are requested to send an unduplicated list of names and addresses of said beneficial owners to the address identified in Paragraph 4 below. Plaintiff's counsel will thereafter mail copies of this Notice directly to all such beneficial owners. Plaintiff's counsel offer to prepay the reasonable cost of preparing an unduplicated list of names and addresses of such beneficial owners or of forwarding this Notice to beneficial owners in those cases where a nominee elects to forward this Notice rather than provide a list of names and addresses to Plaintiff's counsel.

**NOW THEREFORE, TAKE NOTICE:**

1. If you were a holder of McAfee common stock who exchanged their shares for consideration in the acquisition of McAfee by Intel at the price of \$48.00 per share and you are neither a named defendant in this action or any person, firm, trust, corporation or other entity related to or affiliated with any defendant, then you are a member of the Class unless you request exclusion therefrom as provided in Paragraph 3 below.

2. All members of the Class who do not request to be excluded will be bound by any judgment, whether or not favorable to the Class. ***If you wish to remain a member of the Class, you need do nothing*** and your rights in this lawsuit will be represented by Robbins Geller Rudman & Dowd LLP, 655 W. Broadway, Suite 1900, San Diego, California, 92101, counsel for Plaintiff and the Class. If you wish, you may enter an appearance through your own counsel at your own expense.

3. ***You may request to be excluded from the Class by mailing a written request for exclusion to the address below***, postmarked on or before June 1, 2012, setting forth your name and address. Persons who request exclusion will not be entitled to share in the benefits of any judgment or settlement nor will they be bound by any settlement or judgment. If you elect to be excluded from the Class, you may pursue, at your own expense, whatever legal rights you may have.

---

<sup>1</sup> On March 13, 2012, Defendants Intel and McAfee filed a writ of mandate with the California Court of Appeal, requesting it overturn the Court's certification of this class.

4. All communications regarding this Notice should be made in writing, should refer to the name and number of this action, *In re McAfee Securities Litigation*, No. 1:10-cv-180413, and should be addressed to:

*In re McAfee Securities Litigation*  
Notice Administration  
c/o Gilardi & Co. LLC  
P.O. Box 8040  
San Rafael, California 94912-8040

PLEASE DO NOT TELEPHONE THE CLERK OF THE COURT REGARDING THIS NOTICE.

DATED: April 2, 2012

---

THE HONORABLE JAMES P. KLEINBERG  
CALIFORNIA SUPERIOR COURT JUDGE

*In re McAfee Securities Litigation*  
Notice Administration  
c/o Gilardi & Co. LLC  
P.O. Box 8040  
San Rafael, California 94912-8040

**Important Legal Document.**

**MCAFEE**