

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

In re McAfee, Inc. Shareholder Litigation )	
Consolidated action, including: )	Lead Case No. 1:10-cv-180413
<i>Greenberg v. McAfee, Inc.</i> , Santa Clara County Superior Court, Case No. 1:10-cv-180413 )	<u>CLASS ACTION</u>
<i>Colwell v. McAfee, Inc.</i> , Santa Clara County Superior Court, Case No. 1:10-cv-180420 )	Judge: Hon. Thomas E. Kuhnle
<i>Faulkner v. McAfee, Inc.</i> , Santa Clara County Superior Court, Case No. 1:10-cv-180597 )	Dept: 5
<i>Korsinsky v. Bass</i> , Santa Clara County Superior Court, Case No. 1:10-cv-180928 )	
_____ )	
This Document Relates To: )	
ALL ACTIONS. )	
_____ )	

**PROOF OF CLAIM**

**I. GENERAL INSTRUCTIONS**

1. All capitalized terms not otherwise defined shall have the same meanings as set forth in the Stipulation of Settlement dated March 13, 2019 (“Settlement”), which can be downloaded at [www.McAfeeShareholderSettlement.com](http://www.McAfeeShareholderSettlement.com).

2. To recover as a member of the Class based on your claims in the action entitled *In re McAfee, Inc. Shareholder Litigation*, Lead Case No. 1:10-cv-180413 (the “Action”), YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, **ON OR BEFORE SEPTEMBER 9, 2019**, ADDRESSED AS FOLLOWS:

*McAfee Shareholder Litigation*  
Claims Administrator  
P.O. Box 404129  
Louisville, KY 40233-4129  
Online Submissions: [www.McAfeeShareholderSettlement.com](http://www.McAfeeShareholderSettlement.com)

3. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement of the Action.

4. If you are a member of the Class and you did not timely request exclusion in connection with the Notice of Pendency, you will be bound by the terms of any judgment entered in the Action, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

**II. DEFINITIONS**

1. “Class” means 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. Also excluded from the Class is any Person who validly requested exclusion from the Class following the issuance of the Notice of Pendency.

2. “Defendants” means Intel Corporation (“Intel”), McAfee, Inc. (“McAfee”), and David G. DeWalt (“DeWalt”).

3. “Notice of Pendency” refers to the Notice of Pendency of Class Action that was issued in connection with the Court’s order of April 2, 2012.

4. “Released Defendant Parties” means Defendants, individually and collectively, and any and all of their families, parent entities, subsidiaries, joint ventures and joint venturers, related or affiliated entities, controlling or managing persons or entities, associates, investors, affiliates or subsidiaries and each and all of their past, present, or future officers, directors, managing directors, stockholders, employees, attorneys, financial or investment advisors, principals, insurers, excess insurers and reinsurers, consultants, accountants and auditors, investment banks and bankers, commercial banks and bankers, entities providing fairness opinions, brokers, dealers, underwriters, analysts, engineers, advisors or agents, spouses, heirs, executors, assigns, trustees, general or limited partners or partnerships, limited liability companies, members, personal or legal representatives, estates, administrators, and each of their respective predecessors, successors, and assigns, whether or not served with process and whether or not such person appeared or was named as a defendant in the Action.

5. "Released Plaintiff Parties' Claims" means any and all manner of claims (including Unknown Claims), actions, demands, losses, rights, causes of action, liabilities, obligations, judgments, suits, disputes, matters and issues of any kind or nature whatsoever (including, but not limited to, any claims for damages (whether compensatory, special, incidental, consequential, punitive, exemplary or otherwise), injunctive relief, declaratory relief, rescission or rescissionary damages, interest, attorneys' fees, expert or consulting fees, costs, expenses, or any other form of legal or equitable relief whatsoever), known or unknown, contingent or absolute, suspected or unsuspected, disclosed or undisclosed, hidden or concealed, liquidated or unliquidated, matured or unmatured, accrued or unaccrued, apparent or unapparent, that have been or could have been asserted in the Action or in any court, tribunal, forum or proceeding (including, but not limited to, any claims arising under federal, state or foreign law, common law, statute, rule, or regulation relating to alleged fraud, breach of any duty, negligence, violations of the federal or state securities and disclosure laws, or otherwise, and any claims relating to unjust enrichment or self-dealing, including, but not limited to, claims relating to compensation, and including all claims within the exclusive jurisdiction of the federal courts), by or on behalf of Plaintiff or by or on behalf of any other Class Member in his, her, or its capacity as a shareholder of McAfee, whether individual, direct, class, derivative, representative, legal, equitable, or any other type or in any other capacity, against the Released Defendant Parties, and that could have arisen or now do arise out of, relate to, concern, or are based upon the allegations, conduct, facts, events, transactions, acts, occurrences, statements, representations, misrepresentations, omissions, or any other matter, thing or cause whatsoever, or any series thereof embraced, involved, or set forth in or otherwise related, directly or indirectly, to the Action or the subject matter of the Action. Released Plaintiff Parties' Claims do not include any claims to enforce this Settlement.

### III. CLAIMANT IDENTIFICATION

1. If you held McAfee common stock and exchanged your shares for consideration in the acquisition of McAfee by Intel at the price of \$48.00 per share, use Part I of this form entitled "Claimant Identification" to list the claimant name, mailing address, and account information if relevant (such as for a claim submitted on behalf of an IRA, Trust, or estate account). Please list the most current claimant or account name as you would like the information to appear on the check if eligible for payment. Please also provide a telephone number and/or e-mail address, as the Claims Administrator may need to contact you with questions about the claim submitted. If your Claimant Identification information changes, please notify the Claims Administrator in writing at the address above.

2. All joint purchasers must sign this claim. If you are acting in a representative capacity on behalf of a Class Member (for example, as an executor, administrator, trustee, or other representative), you must submit evidence of your current authority to act on behalf of that Class Member. Such evidence would include, for example, letters testamentary, letters of administration or a copy of the trust documents or other documents which provide you with authority to submit the claim. Please also indicate your representative capacity under your signature on page 4 of this Proof of Claim.

### IV. CLAIM FORM

Use Part II of this form entitled "Schedule of Transactions in McAfee Common Stock" to provide the number of shares of McAfee common stock you held and received consideration for in the acquisition of McAfee by Intel at the price of \$48.00 per share.

**Broker confirmations or other documents verifying the number of shares of McAfee common stock you received consideration for in the acquisition of McAfee by Intel at the price of \$48.00 per share, should be attached to your claim. Failure to do so could delay verification of your claim or result in rejection of your claim.**

Official  
Office  
Use  
Only

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

*In re McAfee, Inc. Shareholder Litigation,*

Lead Case No. 1:10-cv-180413

**PROOF OF CLAIM**

Please Type or Print in the Boxes Below

Do NOT use Red Ink, Pencil, or Staples

Must Be Postmarked (if Mailed)  
or Received (if Submitted Online)  
No Later Than September 9, 2019

**MFI**

**PART I: CLAIMANT IDENTIFICATION**

Last Name	M.I.	First Name			
Last Name (Co-Beneficial Owner)	M.I.	First Name (Co-Beneficial Owner)			
<input type="radio"/> IRA	<input type="radio"/> Joint Tenancy	<input type="radio"/> Employee	<input type="radio"/> Individual	<input type="radio"/> Other	
Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)					
Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)					
Account#/Fund# (Not Necessary for Individual Filers)					

Last Four Digits of Social Security Number	or	Taxpayer Identification Number
Telephone Number (Primary Daytime)		Telephone Number (Alternate)
Email Address		

**MAILING INFORMATION**

Address		
Address		
City	State	Zip Code
Foreign Province	Foreign Postal Code	Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB	CB	<input type="radio"/> ATP <input type="radio"/> KE <input type="radio"/> ICI	<input type="radio"/> BE <input type="radio"/> DR <input type="radio"/> EM	<input type="radio"/> FL <input type="radio"/> ME <input type="radio"/> ND	<input type="radio"/> OP <input type="radio"/> RE <input type="radio"/> SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
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PART II. SCHEDULE OF TRANSACTIONS IN MCAFEE COMMON STOCK

A. Number of shares of McAfee common stock you held and received consideration for in the acquisition of McAfee by Intel at the price of \$48.00 per share:

Grid for entering the number of shares.

Proof Enclosed? Y N

Broker confirmations or other documents verifying the number of shares of McAfee common stock you received consideration for in the acquisition of McAfee by Intel at the price of \$48.00 per share, should be attached to your claim. Failure to do so could delay verification of your claim or result in rejection of your claim.

V. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

1. I (We) submit this Proof of Claim under the terms of the Settlement described in the Notice. I (We) also submit to the jurisdiction of the Superior Court of the State of California, County of Santa Clara, with respect to my (our) claim as a Class Member. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Action. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the McAfee common stock I (we) held and received consideration for in the acquisition of McAfee by Intel at the price of \$48.00 per share, and know of no other person having done so on my (our) behalf.

2. I (We) will fully and completely satisfy, finally and forever settle, release and discharge from, and covenant not to sue with respect to, the Released Plaintiff Parties' Claims as to each and all of the Released Defendant Parties.

3. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

4. I (We) hereby warrant and represent that I (we) have included information about all of my (our) holdings in McAfee common stock requested in this Proof of Claim.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_ in \_\_\_\_\_ (Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g., Beneficial Purchaser, Executor or Administrator)

(Capacity of person(s) signing, e.g., Beneficial Purchaser, Executor or Administrator)

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.

Reminder Checklist:

- 1. Please sign the above declaration.
2. If this claim is being made on behalf of Joint Claimants, then both must sign.
3. Remember to attach copies of supporting documentation.
4. Do not send originals of certificates or other documentation as they will not be returned.
5. Keep a copy of your Proof of Claim and all supporting documentation for your records.
6. If you desire an acknowledgment of receipt of your Proof of Claim please send it Certified Mail, Return Receipt Requested.
7. If you move, please send your new address to the address below.
8. Do not use red pen or highlighter on the Proof of Claim or supporting documentation.

THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN SEPTEMBER 9, 2019, ADDRESSED AS FOLLOWS:

McAfee Shareholder Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 404129
Louisville, KY 40233-4129
www.McAfeeShareholderSettlement.com

