Court File No.: CV-13-00491800-CP

ONTARIO
SUPERIOR COURT OF JUSTICE

THE HONOURABLE	)	Wednesday DAY, THE 23
	)	
JUSTICE EDWARD P. BELOBABA	)	DAY OF January, 2019

B E T W E E N:

DAVID WONG

Plaintiff

- and -

PRETIUM RESOURCES INC. and ROBERT A. QUARTERMAIN

Defendants

Proceeding under the *Class Proceedings Act, 1992*

ORDER
(Certification)

THIS MOTION is brought by the Plaintiff for an order certifying this action as a class proceeding pursuant to the *Class Proceedings Act, 1992*, S.O. 1992 c. 6 (the "*CPA*").

ON READING the materials filed on this motion, the written submissions of the Plaintiff, and on being advised by counsel that the Defendants Pretium Resources Inc. and Robert A. Quartermain consent to this order:

1. **THIS COURT DECLARES** that for the purposes of this order, except to the extent that they are modified in this order, the definitions set out in the Second Fresh as Amended Statement of Claim (the "Claim"), attached hereto as **Schedule "A"**, apply to and are incorporated into this order.

2. **THIS COURT ORDERS** that the within action is certified as a class proceeding pursuant to the *CPA* as against the Defendants, subject to the provisions of this order.

3. **THIS COURT ORDERS** that the Class is defined as:

   (a) All persons, other than Excluded Persons, who:

      i. purchased Pretium common shares listed on the TSX during the Class Period and held some or all of those common shares at the close of trading on October 8, 2013 or October 21, 2013; or

      ii. resided in Canada during the Class Period, purchased Pretium common shares listed on the NYSE during the Class Period, and held some or all of those common shares at the close of trading on October 8, 2013 or October 21, 2013.

   (b) Where "Excluded Persons" means Pretium, Quartermain, Pretium's past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, and any member of Quartermain's family.

4. **THIS COURT ORDERS** that the following issues are certified as common issues for the entire Class:

   (a) Did Pretium release core documents on July 23, August 1, August 15, September 9, September 23, October 3, or October 9, 2013 that contained misrepresentations as pleaded in the Claim?

   (b) If the answer to common issue (a) is yes, did Pretium's core documents released on October 9 and 22, 2013 contain public corrections of those misrepresentations?

   (c) If the answer to common issue (a) is yes, did Quartermain authorize the release of any of the documents containing the misrepresentations?

(d) If the answer to common issue (a) is yes, did Quartermain know that any of the impugned documents contained any of the misrepresentations at the time each impugned document was released?

(e) If the answers to common issues (a) and (c) are yes, is Pretium vicariously liable for Quartermain releasing any of the misrepresentations in any of Pretium's core documents?

(f) Did Quartermain owe a duty of care to the investors who decided to purchase Pretium's common shares on or after July 23, August 1, August 15, September 9, September 23, October 3, and October 9, 2013?

(g) If the answers to common issues (a) and (f) are yes, did Quartermain breach his duty of care by releasing or authorizing the release of the core documents dated July 23, August 1, August 15, September 9, September 23, October 3, and October 9, 2013, containing misrepresentations?

(h) If the answers to common issues (a) and (d) are yes, did Quartermain intend for the misrepresentation to increase the perceived investment value of Pretium's common shares?

(i) If the answers to common issues (a) and (d) are yes, did Quartermain intend that the Class Members would rely on the misrepresentation when deciding whether to buy Pretium's common shares?

(j) If the answer to common issue (g) is yes, is Pretium vicariously liable for Quartermain's breach of his duty of care to the Class Members?

(k) If the answer to common issue (a) is yes, are the Defendants relieved of liability pursuant to s. 138.4(6) of the *Securities Act,* R.S.O. 1990, c. S. 5 (the "*OSA*"), which provides a defence of reasonable investigation?

(l) If the answer to common issue (a) is yes, are the Defendants relieved of liability pursuant to s. 138.4(11) of the *OSA*, which provides a defence of reliance on an expert opinion?

(m) If the answer to common issue (a) is yes, are the Defendants relieved of liability pursuant to s. 138.4(14) of the *OSA*, which provides a defence for misrepresentations in derivative information?

5. **THIS COURT ORDERS** that David Wong is appointed as the representative plaintiff for the Class and Morganti & Co., P.C. is appointed as "Class Counsel".

6. **THIS COURT ORDERS** that the claims asserted by the Class as against the Defendants are statutory secondary market claims pursuant to s. 138.3 of the *OSA*

(and the concordant provisions of the Equivalent Securities Acts), and the claims for common law negligent misrepresentation, all as pleaded in the Claim.

7. **THIS COURT ORDERS** that the relief sought by the Class is as set out in the Claim.
8. **THIS COURT ORDERS** that the litigation plan attached hereto as **Schedule "B"** sets out the manner in which the Plaintiff intends to conduct the action.
9. **THIS COURT ORDERS** that the Class shall be given notice of the certification of this action as a class proceeding pursuant to the Notice Plan attached hereto as **Schedule "C"**, which this Court deems to be adequate notice to all Class Members.
10. **THIS COURT ORDERS** that the cost of giving notice will be paid in the manner described in the Notice Plan.
11. **THIS COURT ORDERS** that Class Members may opt-out of the Class by completing the opt-out coupon attached hereto as **Schedule "D"** (the "Coupon") and sending it to Trilogy Class Action Services (the "Administrator") at 51 Jackes Avenue, Suite 102, Toronto, Ontario, M4T 1E2, or by email to Paul@trilogyclassactions.ca. If the Coupon is sent by regular mail, it will only be valid if it is postmarked by_____, 2019, being 60 days from the date of this Order (the "**Opt-Out Deadline**"). Otherwise, the Coupon will only be valid if it is received by the Administrator no later than the Opt-Out Deadline. After the Opt-Out Deadline, Class Members may opt-out of the Class only with leave of the Court.
12. **THIS COURT ORDERS** that within 30 days after the expiration of the Opt-out period:

(a) Class Counsel will file with the Court and serve on the parties an affidavit confirming their compliance with the notice requirements in paragraphs 9 and 10, above; and

(b) The Administrator will file with the Court and serve on the parties an affidavit listing the names and addresses of those persons, if any, who have opted out of this class action.

13. **THIS COURT ORDERS** that each party will bear its own costs of this motion for certification of a class proceeding.

Edward Belobaba J.

The Honourable Justice Edward Belobaba

ENTERED AT / INSCRIPT À TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO.:

JAN 24 2018

PER / PAR:

SCHEDULE "A"

Court File No.: CV-13-00491800-CP

AMENDED THIS Jan 22 / 18 PURSUANT TO
MODIFIÉ CE CONFORMÉMENT À
☐ RULE/LA RÈGLE 26.02 (BETWEEN / ENTRE)
☐ THE ORDER OF
L'ORDONNANCE DU
DATED / FAIT LE
REGISTRAR
SUPERIOR COURT OF JUSTICE
GREFFIER
COUR SUPÉRIEURE DE JUSTICE

ONTARIO
SUPERIOR COURT OF JUSTICE

DAVID WONG

Plaintiff

- and -

PRETIUM RESOURCES INC., and ROBERT A. QUARTERMAIN

Defendants

Proceeding under the *Class Proceedings Act, 1992*

SECOND FRESH AS AMENDED STATEMENT OF CLAIM
(Statement of Claim Issued October 29, 2013)

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyers or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and $5,000.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and $400.00 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Issue Date: October 31, 2013

Issued by: T. Doria

Local Registrar

Address of Court Office:

393 University Avenue, 10th Floor
Toronto, ON M5G 1E6

TO: **MCCARTHY TÉTRAULT LLP**
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Lawyers for the Defendants

CLAIM

DEFINITIONS

1. In this Second Fresh as Amended Statement of Claim, in addition to the terms that are defined elsewhere herein and/or in the Ontario *Securities Act*, the following terms have the following meanings:

(a) "***BCA***" means the *Business Corporations Act*, S.B.C. 2002, Ch. 57, as amended;

(b) "**Bulk Sample Program**" means the bulk sample program consisting of a (i) 10,000-tonne bulk sample excavation, and (ii) 15,000-meter underground drilling program performed by Strathcona for Pretium at the VOK, which was undertaken to confirm the accuracy of the November 2012 Mineral Resource Estimate (and by necessary extension, the Feasibility Study);

(c) "**Brucejack**" means Pretium's advanced gold exploration project located 65 kilometers north of Stewart, British Columbia;

(d) "**CEO**" means Chief Executive Officer;

(e) "**CIM**" means the Canadian Institute of Mining, Metallurgy and Petroleum;

(f) "**CIM Standards**" means the CIM Definition Standards - For Mineral Resources and Mineral Reserves adopted by CIM Council on November 27, 2010;

(g) "***CJA***" means the *Courts of Justice Act*, R.S.O. 1990, c. C-43, as amended;

(h) "**Class**" and "**Class Members**" mean (a) all persons and entities, wherever they may reside or be domiciled, who acquired Pretium's securities listed on the TSX

during the Class Period, other than the Excluded Persons, and (b) all persons and other entities residing in Canada, or formed or registered under the provincial or federal laws of Canada, other than Excluded Persons, who acquired Pretium's securities on the NYSE or in an over-the-counter transaction during the Class Period;

(i) "**Class Period**" means the period from and including July 23, 2013 to and including October 21, 2013;

(j) "**Company**" means Pretium;

(k) "***CPA***" means the *Class Proceedings Act, 1992*, S.O. 1992, c. 6, as amended;

(l) "**CSA**" means the Canadian Securities Administrators;

(m) "**Defendants**" means Pretium and Quartermain;

(n) "**EDGAR**" means the the Electronic Data Gathering, Analysis, and Retrieval system, a database of documents submitted by companies and others who are required by law to file documents with the United States Securities and Exchange Commission;

(o) "**Excluded Persons**" means the Defendants, and Pretium's past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, and any member of Quartermain's family;

(p) "**Feasibility Study**" means the report prepared by Tetra Tech WEI Inc., entitled "Feasibility Study and Technical Report on the Brucejack Project", dated June 23, 2013;

(q) "**Impugned Documents**" (each being an "**Impugned Document**") means, collectively:

(i) the material change reports filed on SEDAR on July 23, 2013, August 23, 2013 and October 9, 2013;

(ii) the MD&A filed on SEDAR on August 1, 2013; and

(iii) the news releases filed on SEDAR on July 23, 2013, August 15, 2013, September 9, 2013, September 23, 2013, and October 3, 2013.

(r) "**Mineral Reserve(s)**" has the meaning ascribed to that term in the CIM Standards;

(s) "**Mineral Resource(s)**" has the meaning ascribed to that term in the CIM Standards;

(t) "**MD&A**" means Management's Discussion and Analysis, as defined in NI 51-102;

(u) "**NI 43-101**" means the CSA's "National Instrument 43-101 – Standards of Disclosure for Mineral Projects";

(v) "**NI 51-102**" means the CSA's National Instrument 51-102 – *Continuous Disclosure Obligations*;

(w) "**November 2012 Mineral Resource Estimate**" means the report prepared by Snowden entitled "Pretium Resources Inc.: Brucejack Project, Mineral Resources Update Technical Report" dated November 20, 2012;

(x) "**NYSE**" means the New York Stock Exchange;

(y) "***OSA***" means the *Securities Act*, R.S.O. 1990, c. S.5, as amended;

(z) "**Other Canadian Securities Legislation**" means, collectively, the *Securities Act*, R.S.A. 2000, c. S-4, as amended; the *Securities Act*, R.S.B.C. 1996, c. 418, as amended; *The Securities Act*, C.C.S.M. c. S50, as amended; the *Securities Act*, S.N.B. 2004, c. S-5.5, as amended; the *Securities Act*, R.S.N.L. 1990, c. S-13, as amended; the *Securities Act*, S.N.W.T. 2008, c. 10, as amended; the *Securities Act*, R.S.N.S. 1989, c. 418, as amended; the *Securities Act*, S. Nu. 2008, c. 12, as amended; the *Securities Act*, R.S.P.E.I. 1988, c. S-3.1, as amended; the *Securities Act*, R.S.Q. c. V-1.1, as amended; *The Securities Act, 1988*, S.S. 1988-89, c. S-42.2, as amended; and the *Securities Act*, S.Y. 2007, c. 16, as amended;

(aa) "**Plaintiff**" means Wong;

(bb) "**Pretium**" means the Defendant, Pretium Resources Inc.;

(cc) "**Qualified Person**" means a person with particular mineral exploration and/or mining expertise, as defined in detail in NI 43-101;

(dd) "**Quartermain**" means the Defendant, Robert A. Quartermain;

(ee) "**SEDAR**" means the system for electronic document analysis and retrieval of the Canadian Securities Administrators;

(ff) "**Snowden**" means Snowden Mining Industry Consultants Inc.;

(gg) "**Strathcona**" means Strathcona Mineral Services Ltd., which was retained by Pretium as the Qualified Person to perform the Bulk Sample Program at the Valley of Kings mine within the Brucejack Projet;

(hh) "**TSX**" means the Toronto Stock Exchange;

(ii) "**VOK**" means the Valley of the Kings zone of Brucejack; and

(jj) "**Wong**" means the Plaintiff, David Wong.

RELIEF SOUGHT

2. The Plaintiff claims:

(a) Pursuant to section 8 of the *CPA*, an order certifying this action as a class proceeding, appointing the Plaintiff as the representative plaintiff for the Class, describing the Class as definded, stating that the Plaintiff is advancing common law and stutatory secondary market claims, stating the common issues, and specifying the manner which Class Members may opt out of the class proceeding;

(b) A declaration that the Impugned Documents contained misrepresentations at common law and within the meaning of the *OSA* and, if necessary, the Other Canadian Securities Legislation;

(c) A declaration that Pretium is vicariously liable for the acts and/or omissions of Quartermain and, as may be applicable, of its other officers, directors, partners or employees;

(d) General damages, as against all Defendants, in the sum of CAD $60 million plus an amount to compensate the Class Members for the losses associated with acquiring Pretium's securities outside of Canada;

(e) An order directing a reference or giving such other directions as may be necessary to determine the issues, if any, not determined at the trial of the common issues;

(f) Prejudgment and postjudgment interest;

(g) Costs of this action plus, pursuant to s 26(9) of the *CPA*, the costs of notice and of administering the plan of distribution of the recovery in this action plus applicable taxes; and

(h) Such further and other relief as this Honourable Court deems just.

BACKGROUND

The Action

3. This securities class action concerns certain public disclosures dated July 23, August 1, August 15, September 9, September 23, October 3, and October 9, 2013, released by Pretium, a publicly-traded mineral exploration and development company.

4. As particularized in this Second Fresh as Amended Statement of Claim and the reasons for decision in the leave to proceed motion in this action, found at 2017 ONSC 3361 with

leave to appeal dismissed on December 1, 2017, during the Class Period Pretium released the Impugned Documents which omitted material facts necessary to render the statements that were made therein not misleading.

5. While the Bulk Sample Program was being conducted, Strathcona conveyed adverse material facts to Pretium – on July 11 (email), July 12 (conference), August 14 (letter), August 21 (meeting), September 5, 2013 (an Interim Technical Report), September 13 (email), September 20 (email), September 28, 2013 (email), and October 7, 2013 (letter) – that its ongoing analysis of data obtained from the Bulk Sample Program, including ore processed through a sampling tower, was failing to confirm, or substantially confirm, the validity of the company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study. Pretium chose to omit these material adverse facts from the Impugned Documents released during the Class Period.

6. As a direct and foreseeable result of those omissions of material fact from Pretium's disclosures released between July 23 and October 9, 2013, Pretium's securities were artificially inflated in price until the release of the final public corrections because the omitted adverse statements altered the total mix of information about the Bulk Sample Program, November 2012 Mineral Resource Estimate, and June 2013 Feasability Study, as well as the corresponding cost of building the VOK mine and the time and quantum of gold.

7. The Plaintiff acquired Pretium's shares during the Class Period without knowledge that the Impugned Documents contained misrepresentations, held all of those shares until

after the misrepresentations contained therein were publicly corrected, and realized a financial loss as a consequence.

8. On behalf of himself and the Class, the Plaintiff advances common law and statutory secondary market claims against the Defendants.

Mineral Exploration Generally and the Materiality of Technical Information

9. Mineral exploration is a complex and expensive business. It also entails significant risk. The chances of successfully discovering, defining and developing an ore deposit are very slim. However, risk can be:

   (a) reduced when the explorer employs or retains reputable professional geoscientists and mining engineers as a matter of course for its scientific and technical matters; and

   (b) balanced by the expectation of attractive financial returns if a mineral deposit is brought into production.

10. Mineral exploration is designed to test for the presence of economically significant mineralization. Results of exploration programs are evaluated and documented at each stage and decisions for further work are made based on these results.

11. When a Mineral Resource is established, a series of detailed drilling and testing programs and technical and economic studies can then be undertaken to investigate whether a Mineral Resource is of sufficient merit to be upgraded to a Mineral Reserve and economically feasible to mine and process (i.e., when the cost of production is below the market price of the commodity being mined and processed). Such investigations are

referred to as pre-feasibility or feasibility studies and, if positive, are used to establish Mineral Reserves. Positive economic feasibility studies are typically the impetus for mine-financing arrangements.

12. The reporting and disclosure requirements of NI 43-101 are imposed on mineral exploration and development companies over and above general statutory disclosure rules. This is because of the material impact that scientific and technical information can have on the market for a mineral exploration and development company's securities.

13. During the often long period between exploration and development, a mineral exploration and development company may have little or no revenue from production, making its financial disclosures much less relevant to an investment decision than its scientific and technical disclosures.

Pretium's Mineral Exploration, Technical Information and Experts

14. Pretium's business during the Class Period consisted substantially of advanced stage exploration of Brucejack. Pretium did not have operating mineral properties, nor did it produce gold or earn revenue from gold sales during the Class Period. As such, the prospect that Pretium would locate and be able to mine and process ore from Brucejack in an economically viable manner was the primary basis upon which investors valued Pretium's securities during the Class Period.

15. During 2011 and 2012, Pretium conducted surface mapping and exploration drilling programs at Brucejack. Mining consultants, including Snowden, used the data generated for the completion of Mineral Resource estimates for Brucejack. Those estimates were presented to the public in technical reports disclosed pursuant to NI 43-101.

16. The November 2012 Mineral Resource Estimate prepared by Snowden was one such estimate. Pretium used it as the basis to allocate resources and prepare a Feasibility Study, which estimated that Brucejack contained economically recoverable Mineral Reserves capable of supporting a mine producing 425,000 ounces of gold annually for ten years, with a twenty-two (22) year mine life.

17. In late 2012, Pretium hired consultants from Strathcona, a well-known and reputable firm of mining consultants, as independent Qualified Persons to oversee the Bulk Sample Program for the VOK. The primary purpose of the Bulk Sample Program was to collect representative samples from the mineralized areas of the VOK. The objective of the Bulk Sample Program was, principally, the independent third-party validation of the November 2012 Mineral Resource Estimate.

18. The Defendants knew that Strathcona's investment would add and create further credibility to the Bulk Sample Program and overall investor confidence in the Company and the VOK, as reflected in the Impugned Documents.

19. To perform Pretium's Bulk Sample Program, consultants from Strathcona were, in general terms, overseeing the excavation of a representative 10,000 tonne sample of the area to be mined. This sample was to be analyzed using a "sample tower" technique and then milled and processed to examine the mineral content. Consultants from Strathcona were also responsible for overseeing an underground 15,000-meter underground drilling component within the VOK of the Bulk Sample Program.

20. On July 11, 2013, Strathcona conveyed the first of several adverse statements and finding about the preliminary results of the Bulk Sample Program. Pretium released public

disclosures on the status of its Bulk Sample Program which omitted these adverse statements and findings, some of which promoted further positive discoveries from the underground drilling component of the program.

21. Pretium controlled the total mix of information available to investors about the Bulk Sample Program, which was overwhelmingly positive or otherwise bullish because Pretium intentionally withheld Strathcona's adverse statements that the preliminary results from the Bulk Sample Program were materially different than what was expected in the November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

22. Impugned Documents all contained material misrepresentations as they omitted to state an adverse material fact that Strathcona, the Qualified Person responsible for the Bulk Sample Program, had formed and communicated to Pretium its belief that the Bulk Sample Program was failing to confirm the validity of the November 2012 Mineral Resource Estimate, including the grade distribution and classification of Mineral Resources contained in the November 2012 Mineral Resource Estimate, and by necessary extension the validity of the Feasibility Study.

23. This truth was not revealed until a series of disclosures in October 2013. First, on October 9, 2013, Pretium released a material change report that disclosed that Strathcona had resigned from its role in Pretium's Bulk Sample Program, and before it was complete. Pretium did not disclose the reason for Strathcona's departure at this time.

24. Second, on October 22, 2013, Pretium released news disclosing that Strathcona, in withdrawing, advised Pretium that it disputed that there were valid gold Mineral Resources for the VOK zone of Brucejack. By extension, Strathcona advised that there

could be no basis for Mineral Reserves or a positive Feasibility Study. Pretium reported that Strathcona had advised it of these adverse material facts as soon as it had completed 20% of the Bulk Sample Program, i.e., on July 11, 2013.

25. The news release also noted that Strathcona asserted that past statements by Pretium about probable Mineral Reserves and future gold production over a twenty-two (22) year mine life were erroneous and misleading, and, that Strathcona had previously asserted similar views to Pretium.

26. At all material times, it was a misrepresentation to omit to disclose the assessment of Strathcona, the Qualified Person responsible for the Bulk Sample Program, particularly when it expressed adverse material facts that the Bulk Sample Program was not confirming to the November 2012 Mineral Resource Estimate, especially given that Pretium chose to make interim disclosures about the Bulk Sample Program. In the absence of that material information, the Impugned Documents were misleading, with the result that the price at which Pretium's securities traded during the Class Period was artificially inflated and unrepresentative of the true state of affairs.

THE PARTIES

The Plaintiff

27. Wong is a resident of Richmond Hill, Ontario. During the Class Period, on August 21, 2013, he purchased 1,000 common shares of Pretium on the TSX, and he held all of those shares until after the close of the Class Period. The Plaintiff reviewed and relied upon Pretium's August 1, 2013 MD&A in making his decision to purchase Pretium's securities.

The Defendants

28. Pretium is a Canadian mineral exploration and development company that was incorporated under the *BCA* on October 22, 2010. Pretium maintains registered and principal business offices in Vancouver, British Columbia.

29. During the Class Period, Pretium's only material mineral project was Brucejack, an advanced-stage mineral exploration project located in north-western British Columbia.

30. At all materials times, Pretium was a reporting issuer in all Canadian provinces and territories except for Quebec, and a registrant with the U.S. Securities and Exchange Commission. Pretium's common shares are listed for trading on the TSX and the NYSE under the ticker symbol "PVG". Pretium's securities are also listed for trading on alternative trading venues in Canada, the United States and elsewhere.

31. At all material times, Quartermain was a director and the President and CEO of Pretium. In his capacity as Pretium's CEO, Quartermain certified, authorized, permitted the issuance of, or acquiesced in the issuance of, the Impugned Documents.

PRETIUM'S DISCLOSURE OBLIGATIONS

32. By its own election, Pretium was a reporting issuer in all Canadian provinces and territories other than Quebec throughout the Class Period. Pretium elected to become a reporting issuer in order to render its securities publicly-tradable, which provided it with a broader ability to raise capital.

33. Pretium was required throughout the Class Period to release and file with SEDAR the following documents:

(a) MD&A, within 45 days of the end of each quarter, or 90 days in the case of the end of a fiscal year, contemporaneously with financial statements prepared in accordance with applicable accounting principles; and

(b) material change reports, not later than 10 days from the date on which the change occurred in the affairs of Pretium.

34. MD&As are a narrative explanation of how the company performed during the period covered by the financial statements, and of the company's financial condition and future prospects. The MD&A must discuss important trends and risks that have affected the financial statements, and trends and risks that are reasonably likely to affect them in the future.

35. In particular, Item 1.4(g) of Form 51-102F1 – *Management's Discussion & Analysis* (which prescribes the content of MD&As required under NI 51-102) required Pretium to disclose in its MD&A any commitments, events, risks or uncertainties that it reasonably believed would materially affect Pretium's future performance.

36. When the Defendants released statements about the status of the Bulk Sample Program (e.g., both or independently about the 10,000 tonne sample project or 15,000 meter underground drilling project) they obligated themselves to disclose all material facts on the topic(s).

37. The Defendants directly or indirectly controlled the contents of Pretium's MD&A, material change reports and the other news releases particularized herein. Any misrepresentations made therein were made by the Defendants.

QUARTERMAIN'S ROLE IN DISCLOSURE

38. Quartermain knew, from the time that he accepted his positions with Pretium, that Pretium was a reporting issuer and that in his role as a director and officer of Pretium, he would have direct responsibility for ensuring the accuracy and completeness of Pretium's disclosure documents.

39. The *OSA*, the Other Canadian Securities Legislation, and certain National Instruments and Companion Policies promulgated thereunder, imposed specific obligations on Quartermain in the preparation of Pretium's continuous disclosure documents.

40. Sections 77 and 78 of the *OSA*, and the concordant provisions of the Other Canadian Securities Legislation, informed by NI 52-109, required Quartermain to review, approve and certify the accuracy of Pretium's financial statements and MD&A released during the Class Period.

41. NI 51-102 requires the board of directors of a reporting issuer to approve each set of financial statements and MD&A released by the reporting issuer prior to the release of those documents. As such, Quartermain, who was a director of Pretium during the Class

Period, was required to approve each set of financial statements and MD&A prior to its release.

42. NI 43-101 requires that all disclosure of scientific or technical information made by a reporting issuer, including disclosure of a Mineral Resource or Mineral Reserve, concerning a mineral project on a property material to the issuer must be either based upon information prepared by or under the supervision of a Qualified Person or approved by a Qualified Person. At all material times, Quartermain was responsible for supervising the Qualified Persons employed and/or contracted by Pretium.

43. Quartermain was aware of and accepted these obligations in assuming his position as a director and officer of Pretium.

THE MISREPRESENTATIONS IN THE IMPUGNED DOCUMENTS

The July 23, 2013 Misrepresentations

44. On July 23, 2013, Pretium issued a news release and filed a material change report on SEDAR.

45. The news release and material change report reported on the status of the Bulk Sample Program overseen by Strathcona, providing selective highlights from the underground drilling component of the program, and reported on the status of the excavation component of the Bulk Sample Program.

46. In the news release and material change report, Pretium stated that "it is pleased to report the discovery of the Cleopatra Vein within the Valley of the Kings and additional underground drill results from the Valley of the Kings Bulk Sample Program… currently underway".

47. The release then proceeded to report on "[s]elected drill highlights" from the underground drilling component of the Bulk Sample Program that contained high concentrations of gold per tonne. The release also contained a detailed table of drilling results that also reported numerous findings of high concentrations of gold.

48. These statements, including all reported results from the underground drilling component of the Bulk Sample Program, were misrepresentations. They presented a substantively unbalanced view of the prospective minability of Brucejack by omitting to state that Strathcona had advised Pretium that its ongoing analysis of the data from the Bulk Sample Program, including the underground drilling component, was failing to confirm, or substantially confirm, the validity of the company's November 2012 Mineral Resource Estimate.

49. The July 23, 2013 news release and material change report also reported on the status of the excavation component of the Bulk Sample Program. The release disclosed that:

> Excavation of the 426585E cross-cut has been completed and the excavation of the 426615E cross-cut is nearing completion. Bulk sample material excavation to date, approximately 5,500 tones, has been processed through the sample tower and is being transported offsite.

50. This statement was a misrepresentation as the Company represented that the excavation component of the Bulk Sample Program was continuing normally even as it omitted to state that on July 11 and 12, 2013, Strathcona had advised Pretium that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate. Strathcona also conveyed that: (a) the then-current block model grade predictions contained in the Feasibility Study

had not been verified by the preliminary assay results; and (2) the underground bulk mining methods were in doubt and would have profound implications for the VOK project.

The August 1, 2013 MD&A Misrepresentations

51. On August 1, 2013, Pretium filed on SEDAR its MD&A for the second quarter of 2013. The MD&A reported on the status of the excavation component of the Bulk Sample Program, stating that:

> The 10,000-tonne bulk sample is being excavated in 100-tonne rounds. Each round is crushed and run through a sample tower on site. The sample tower has been designed and constructed to extract two 30-kilogram representative samples from each 100-tonne round processed by the sample tower. The representative samples extracted by the sample tower will be assayed, and the assay results will be reported by Strathcona in their report on the [Bulk Sample] Program.

52. This statement was a misrepresentation as the Company represented that the excavation component of the Bulk Sample Program was continuing normally even as it omitted to state that Strathcona had advised Pretium that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate.

53. The August 1, 2013 MD&A also reported on the status of the underground drilling component of the Bulk Sample Program, stating that the "[u]nderground drilling for the Program is on schedule, with a total of 124 drill holes now complete", as well as touting certain intersections of extremely high concentrations of gold.

54. These statements, including all reported results from the underground drilling component of the Bulk Sample Program, were misrepresentations. They presented a substantively

unbalanced view of the prospective minability of Brucejack by omitting to state that Strathcona had advised Pretium on July 11 and 12, 2013, that its ongoing analysis of the data from the Bulk Sample Program, including the underground drilling component, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

The August 23, 2013 Misrepresentations

55. On August 23, 2013, Pretium filed on SEDAR a material change report. This material change report contained the same content as a Pretium news release that had been issued on August 15, 2013. The material change report touted additional positive drill results from the underground drilling component of the Bulk Sample Program, stating that "[a]ssays from the [Bulk Sample] Program continue to confirm the projection of high-grade gold mineralized domains, and visible gold continues to be encountered." The release also contained a detailed table of drilling results that also reported numerous findings of high concentrations of gold.

56. These statements, including all reported results from the underground drilling component of the Bulk Sample Program, were misrepresentations. They presented a substantively unbalanced view of the prospective minability of Brucejack by omitting to state that Strathcona had advised Pretium on July 11 (email), July 12 (conference), August 14 (letter), and August 21, 2013 (meeting), that its ongoing analysis of data from the Bulk Sample Program, including the underground drilling component, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

57. The August 23, 2013, material change report also reported on the status of the excavation component of the Bulk Sample Program, stating that the "Bulk sample material excavated to date, approximately 8,600 tonnes, has been processed through the sample tower and is being transported offsite."

58. This statement was a misrepresentation as the Company represented that the excavation component of the Bulk Sample Program was continuing normally even as it omitted to state that Strathcona had advised Pretium on July 11 and 12, as well as by way of a detailed letter dated August 14, 2013, that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

The September 9, 2013 Misrepresentations

59. On September 9, 2013 Pretium issued and filed on SEDAR a news release entitled "Underground Drilling Continues to Intersect High-Grade Gold". The release then proceeded to report on "[s]elected drill highlights" that contained high concentrations of gold per tonne. The release also contained a detailed table of drilling results that also reported numerous findings of high concentrations of gold.

60. These statements, including all reported results from the underground drilling component of the Bulk Sample Program, were misrepresentations. They presented a substantively unbalanced view of the prospective minability of Brucejack by omitting to state that Strathcona had advised Pretium that its ongoing analysis of the data from the Bulk Sample Program, including the underground drilling component, was failing to confirm,

or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate.

61. The September 9, 2013 news release also reported on the status of the excavation component of the Bulk Sample Program, noting that "[t]he 10,000 tonnes of bulk sample material has been processed through the sample tower on site and is being transported offsite to a custom mill located in Toronto."

62. This statement was a misrepresentation as the Company represented that the excavation component of the Bulk Sample Program was continuing normally even as it omitted to state that Strathcona had advised Pretium on July 11 (email), July 12 (conference), August 14 (letter), August 21 (meeting), and September 5, 2013 (an Interim Technical Report), that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

The September 23, 2013 Misrepresentations

63. On September 23, 2013, Pretium issued and filed on SEDAR a news release entitled "Bulk Sample and Exploration Drilling update". The release then proceeded to report on "[s]elected drill highlights" that contained high concentrations of gold per tonne. The release also contained a detailed table of drilling results that also reported numerous findings of high concentrations of gold.

64. These statements, including all reported results from the underground drilling component of the Bulk Sample Program, were misrepresentations. They presented a substantively

unbalanced view of the prospective minability of Brucejack by omitting to state that Strathcona's ongoing analysis of the data from the Bulk Sample Program, including the underground drilling component, was failing to confirm, or substantially confirm, the validity of the Company's November 2012 Mineral Resource Estimate.

65. The September 23, 2013 news release also reported on the status of the excavation component of the Bulk Sample Program, noting that "[d]ue to the projected time to complete assaying on the samples from the sample tower, Strathcona's report on the Program is now expected early in 2014 after compilation of all data."

66. This statement was a misrepresentation as the Company represented that the excavation component of the Bulk Sample Program was continuing normally even as they omitted to state that Strathcona had advised Pretium on July 11 (email), July 12 (conference), August 14 (letter), August 21 (meeting), September 5 (an Interim Technical Report), and September 20, 2013 (email), that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

The October 3, 2013 Misrepresentations

67. On October 3, 2013, Pretium released and filed on SEDAR a news release providing an update on the Bulk Sample Program that again omitted Strathcona's adverse statements and findings conveyed on July 11 (email), July 12 (conference), August 14 (letter), August 21 (meeting), September 5, 2013 (an Interim Technical Report), September 13 (email), September 20 (email), and September 28, 2013 (email), that its ongoing analysis of data obtained from the Bulk Sample Program, including material processed through

the sample tower, was failing to confirm, or substantially confirm, the validity of the company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

Why Strathcona's Findings Were Material

68. Pretium's failure to disclose Strathcona's belief that the November 2012 Mineral Resource Estimate and June 2013 Feasibility Study were inaccurate, as detailed herein, was material because during the Class Period Pretium was a development-stage mining company that had no production revenue. Accordingly, the valuation of Pretium's securities was (and is) substantially determined by the prospects of its mineral interests.

69. Prior to the commencement of and during the Class Period, the only available information about the two projects of the Bulk Sample Program and accuracy of the November 2012 Mineral Resource Estimate and June 2013 Feasibility Study was positive. Strathcona's adverse statements and findings would have materially altered the total mix of information available to the reasonable investor in making an investment decision to buy or sell Pretium's securities.

70. In such circumstances, the estimations of Pretium's independent experts about the extent of the Mineral Resources and Mineral Reserves in the VOK were critical to investors' valuation of Pretium's securities. The fact that the Qualified Person responsible for overseeing the Bulk Sample Program that was intended to confirm the November 2012 Mineral Resource Estimate had serious doubts about its validity, indicated additional risks surrounding the VOK development that would be certain to reduce the valuation of Pretium's securities.

71. As reflect by the resulting drop in value and price of Pretium's securities immediately after each of the two public corrections on October 9 and 21, 2013, Strathonca's adverse statements and findings were material.

QUARTERMAIN'S FALSE CERTIFICATIONS

72. Pursuant to NI 52-109 and the analogous provisions of United States law, the Defendant Quartermain, as CEO of Pretium during the Class Period, was required at all material times to certify Pretium's MD&A.

73. The certification Quartermain provided included the statement that it did "not contain any untrue statement of a material fact or omit to state a material fact required to be stated or that is necessary to make a statement not misleading in light of the circumstances under which it was made".

74. As particularized above, Pretium's MD&A for the second quarter of 2013 contained misrepresentations. Accordingly, the certification signed by Quartermain was false and was itself a misrepresentation.

THE TRUTH EMERGES

75. On October 9, 2013, Pretium issued a material change report that disclosed, *inter alia*, that Strathcona had resigned from its position before the Bulk Sample Program was complete. Pretium did not disclose the reason for Strathcona's departure at this time or Strathcona's adverse statements and findings conveyed on July 11 (email), July 12 (conference), August 14 (letter), August 21 (meeting), September 5, 2013 (an Interim Technical Report), September 13 (email), September 20 (email), September 28, 2013 (email), and October 7, 2013 (resignation letter) that its ongoing analysis of data obtained

from the Bulk Sample Program, including material processed through the sample tower, was failing to confirm, or substantially confirm, the validity of the company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

76. As a result, Pretium's statement released on October 9, 2013, also contained misrepresentations.

77. On October 22, 2013, Pretium filed on SEDAR a news release and material change report. In these documents, Pretium revealed the reasons for Strathcona's departure. In a lengthy section of the material change report entitled "Strathcona's Withdrawal from the Program", Pretium stated that:

> As stated above, consultants from Strathcona were engaged in late 2012 as independent Qualified Persons to oversee the 10,000-tonne bulk sample and produce a report at the conclusion of the Program once all data, including the assay results from sample tower and the 16,789 meters of completed underground drilling, had been compiled. The report was expected to reconcile the assay results from the sample tower against a local resource estimate prepared by Snowden based on the Program drilling, which would provide an empirical grade prediction variance for a stope-sized tonnage that could be related to and used for resource classification. Strathcona's report on the Program was expected in early 2014.
>
> Strathcona withdrew from the Program on October 8, 2013 before any results from the processing of the bulk sample were available. In withdrawing from the Program, Strathcona advised Pretivm that **"...there are no valid gold mineral resources for the VOK Zone, and without mineral resources there can be no mineral reserves, and without mineral reserves there can be no basis for a Feasibility Study." They also advised that "...statements included in all recent press releases [by Pretivm] about probable mineral reserves and future gold production [from the Valley of the Kings zone] over a 22-year mine life are erroneous and misleading." Snowden maintains its stance that the November 2012 Mineral Resource Estimate remains valid, and has taken steps to involve a third party peer review in its up-coming mineral resource update.**
>
> In addition, Strathcona advised that, "The infrequent high-grade intercepts reported in the press releases have been shown in the underground exposures of the bulk sample program to usually be of very narrow width (0.5 meters) and associated with narrow geological structures that occasionally have mineable continuity as in the case of the Cleopatra Vein." The results from Valley of the Kings Program drilling have been, from the outset, consistent with results from prior exploration drilling in the Valley of the Kings. Drilling has frequently intersected extreme grade mineralization over narrow widths, with 47 intersections grading greater than 1,000 grams of gold per tonne from underground drilling (on average there is one in every 550 meters of 2013 drilling) and 125 intersections in total to date grading greater than 1,000 grams of gold per tonne for the Valley of the Kings. The Program was initiated, amongst other reasons, to determine the bulk minability of the Valley of the Kings mineralization. These reasons and the form of mineralization were discussed with Strathcona prior to their engagement.

> When it withdrew, **Strathcona advised Pretium that it had previously asserted similar views critiquing the Snowden resource model for the Valley of the Kings, accompanied with "recommendations" for public disclosure of the preliminary bulk sample data supporting their conclusions.** At one point, these assertions, conclusions and "recommendations" were made on the basis of approximately 20% of the underground drilling results, no assay results from the sample tower and no results from production.
>
> Snowden has consistently and repeatedly advised in response to all comments from Strathcona that the true test of the resource estimate will only come from the reconciliation results between the ultimate grade of the bulk sample (as defined by produced metal and metal accounting) and the grade of the resource estimate for the same volume. Strathcona resigned before Snowden had an opportunity to formally respond to their assertions.
>
> Both Pretivm's management and Snowden share a number of significant concerns with respect to Strathcona's conclusions. They contend that the Strathcona conclusions are based on: (a) the interpretation of preliminary data, (b) the interpretation of too few data, and (c) the incorrect interpretation and application of preliminary local data for comparison to the resource estimate model. Pretivm management and Snowden also share significant concerns that the sampling tower approach for the Valley of the Kings deposit may be flawed. [emphasis added]

78. Upon the disclosure of the resignation of Strathcona, the market value of Pretium's shares on the TSX declined by more than 30% on heavy trading volume, from C$7.01 as at the close of trading on October 8, 2013 to C$4.87 at the close of trading on October 9, 2013. Subsequently, upon the disclosure of the truth about Strathcona's resignation on October 22, 2013, the market value of Pretium's shares on the TSX declined approximately 28% on heavy trading volume, from C$4.77 as at the close of trading on October 21, 2013 to C$3.45 at the close of trading on October 22, 2013.

NO REASONABLE INVESTIGATION DEFENSE

79. Prior to the release of each Impugned Statement, Strathcona conveyed adverse statements about the preliminary results of the Bulk Sample Program to the Defendants.

80. The Defendants did not obtain a second opinion about Strathcona's adverse statements and prelinary results prior to releasing the Impugned Documents. It was not until October 14, 2013 that the Defendants' hired third-party expert reviewed Strathcona's adverse statements in order to provide a preliminary statement to the Defendants.

NO EXPERT RELIANCE DEFENSE

81. The Defendants cannot rely on any type of expert reliance defense because it is inapplicable.

82. No part of the Impugned Documents contained statements from experts.

83. The Defendants did not rely upon an expert in making the decision to omit Stathcona's adverse statements and preliminary findings that the Bulk Sample Program was invalidating the company's November 2012 Mineral Resource Estimate and June 2013 Feasibility Study.

84. Rather, it was Strathcona that requested that the Defendants disclose their adverse statements and preliminary findings, and it was the Defendants' refusal to do so that resulted in Strathcona resigning from the Bulk Sample Program.

85. Further, prior to the commencement of the Class Period, the Defendants' own internal technical staff recognized the same problems identified by Strathcona but chose not to disclose those adverse findings in the Impugned Documents.

CAUSES OF ACTION

Count No. 1: Common Law Secondary Market Negligent Misrepresentation

86. On behalf of himself and all Class Members who acquired Pretium's securities in the secondary market, the Plaintiff advances a common law claim for negligent misrepresentation against all of the Defendants pertaining to all of the Impugned Documents.

87. The Impugned Documents were prepared for the purpose of attracting investment and inducing Class Members to purchase Pretium's securities. The Defendants knew and

intended at all material times that those documents were prepared for that purpose, and that the Class Members would rely reasonably and to their detriment upon such documents, including the scientific and technical information contained therein, in making the decision to purchase Pretium securities.

88. The Defendants further knew and intended that the information contained in the documents would be incorporated into the price of Pretium's publicly-traded securities such that the trading price of those securities would at all times reflect the information contained in the documents.

89. Throughout the Class Period, the Defendants had exclusive access to information about Pretium's business and operations. As such, they were the primary source of information specifically related to Pretium's business, which was relevant to the decision to acquire Pretium's securities and the price at which they would be acquired.

90. As Pretium's CEO, Quartermain certified the accuracy of the second quarter 2013 MD&A issued by Pretium during the Class Period. Therein, he asserted that this document did "not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading." He authorized, permitted or acquiesced in the release of Pretium's Class Period disclosure documents and adopted the statements contained therein by certifying their accuracy.

91. The Defendants owed Class Members a duty of care to ensure that Pretium's disclosure documents did not misrepresent the material facts pertaining to Pretium's business and operations. That duty was informed by the *OSA* and the Other Canadian Securities

Legislation as well as subsidiary instruments cited herein, including NI 43-101, NI 51-102 and NI 52-109.

92. The Defendants breached that duty by failing to take adequate care:

(a) to properly incorporate the advice received from Strathcona whom they had hired to provide just such advice;

(b) to disclose that Strathcona had reached conclusions that impugned or tended to impugn the grade distribution and classification of Mineral Resources contained in the November 2012 Mineral Resource Estimate and, by extension, the grade distribution and classification of Mineral Reserves reported in the Feasibility Study, and the projected life of mine that Pretium was promoting for development at Brucejack; and

(c) to disclose that Strathcona strongly disagreed with any of Pretium's prior disclosures issued during the Class Period.

93. The Plaintiff and the other Class Members directly or indirectly relied upon the misrepresentations in making a decision to purchase Pretium's securities, and suffered damages when the truth was revealed in part on October 9, 2013 and in balance on October 22, 2013.

94. Alternatively, the Plaintiff and the other Class Members relied upon the misrepresentations by the act of purchasing Pretium's securities in an efficient market that promptly incorporated into the price of those securities all publicly-available material information regarding Pretium's business and operations. As a result, the repeated misrepresentations caused the price of Pretium's shares to trade at inflated prices during

the Class Period, thus directly resulting in damage to the Plaintiff and the other Class Members.

Count No. 2: Statutory Secondary Market Liability

95. On behalf of all Class Members who acquired Pretium's securities in the secondary market, the Plaintiff advances the statutory claim found in Part XXIII.1 of the *OSA* and, if required, the equivalent sections of the Other Canadian Securities Legislation, against Pretium and Quartermain for all of the Impugned Documents, subject to subsection 138.8(1) of the *OSA* and the equivalent sections of the Other Canadian Securities Legislation.

Core Documents

96. Each of the following Pretium disclosure documents is a "document" and a "core document" within the meaning of Part XXIII.1 of the *OSA* and the equivalent sections of the Other Canadian Securities Legislation:

(a) the material change reports filed on SEDAR on July 23, 2013, August 23, 2013; and October 9, 2013; and

(b) the MD&A filed on SEDAR on August 1, 2013.

97. Pretium released the Impugned Documents referred to in paragraph 96, and each of those Impugned Documents contained one or more misrepresentations, as particularized above. Such misrepresentations are misrepresentations for the purposes of the *OSA* and the Other Canadian Securities Legislation.

98. Quartermain was an officer and director of Pretium at the time of the release of the Impugned Documents referred to in paragraph 96. He authorized, permitted or acquiesced in the release of those documents.

Non-Core Documents

99. Each of the following Pretium news releases is a "document" within the meaning of Part XXIII.1 of the *OSA* and the equivalent sections of the Other Canadian Securities Legislation:

(a) the news release filed on SEDAR on July 23, 2013;

(b) the news release filed on SEDAR on August 15, 2013;

(c) the news release filed on SEDAR on September 9, 2013;

(d) the news release filed on SEDAR on September 23, 2013; and

(e) the news release filed on SEDAR on October 3, 2013.

100. Pretium released the Impugned Documents referred to in paragraph 99, and each of those Impugned Documents contained one or more misrepresentations, as particularized above. Such misrepresentations are misrepresentations for the purposes of the *OSA* and the Other Canadian Securities Legislation.

101. With respect to each of the Impugned Documents identified in paragraph 99, Quartermain either knew at the time that the document was released that the document contained a misrepresentation, or at or before the time that the document was released, he deliberately avoided acquiring knowledge that the document contained a misrepresentation, or he was, through action or failure to act, guilty of gross misconduct in connection with the release of the document.

102. Quartermain, by virtue of his positions at Pretium, ought to have known that the Impugned Documents identified in paragraph 99 were materially misleading.

103. Pursuant to Part XXIII.1 of the *OSA*, the Defendants are liable to pay damages to the Plaintiff and Class Members.

THE RELATIONSHIP BETWEEN PRETIUM'S DISCLOSURES AND THE PRICE OF ITS SECURITIES

104. The price of Pretium's securities was directly affected during the Class Period by the issuance of the documents containing the misrepresentations particularized herein. The Defendants were aware at all material times of the effect of Pretium's disclosure documents upon the price of its securities.

105. The documents were filed, among other places, with EDGAR, SEDAR and the TSX, and thereby became immediately available to, and were reproduced for inspection by, the Class Members, other members of the investing public, financial analysts and the financial press.

106. Pretium routinely transmitted the documents referred to above to the financial press, financial analysts and certain prospective and actual holders of Pretium's securities. Pretium provided either copies of the above referenced documents or links thereto on its website.

107. Pretium regularly communicated with public investors and financial analysts via established market communication mechanisms, including through regular disseminations of their disclosure documents, including press releases on newswire services in Canada, the United States and elsewhere. Each time Pretium communicated

that new material information about its continuing exploration of Brucejack to the public, the price and value of Pretium securities was directly affected.

108. Pretium was the subject of research analysts' reports that incorporated certain of the information contained in the disclosure documents, with the effect that any recommendations to purchase Pretium securities in such reports during the Class Period were based, in whole or in part, upon that information.

109. Pretium's securities were and are traded, among other places, on the TSX and NYSE, which are efficient and automated markets. The price at which Pretium's securities traded promptly incorporated material information from Pretium's disclosure documents about Pretium's business and affairs, including the misrepresentations alleged herein, which was disseminated to the public through the documents referred to above and distributed by Pretium, as well as by other means.

VICARIOUS LIABILITY

110. The Plaintiff pleads and relies upon the allegations of fact contained herein.

111. Additionally, the Plaintiff pleads that:

(a) Pretium operated an enterprise that, through the manner in which it reported its scientific and technical results and updates thereto, carried with it the risk of omission of material facts necessary to render the statements that were made not misleading;

(b) when that risk materialized it caused injury to the Plaintiff and the other Class Members;

(c) the acts or omissions particularized and alleged herein to have been done by Pretium were authorized and/or done by Quartermain and Pretium's other agents, employees and representatives while engaged in the management, direction, control and transaction of its business and affairs and are, therefore, acts and omissions for which Pretium is vicariously liable;

(d) the acts and omissions of Quartermain particularized and alleged herein were also done in performance of his own obligations at law, and he remains personally liable to the Plaintiff and the Class Members for his acts and omissions;

REAL AND SUBSTANTIAL CONNECTION WITH ONTARIO

112. The Plaintiff pleads that this action has a real and substantial connection with Ontario because, among other things:

(a) Pretium is a reporting issuer in Ontario;

(b) Pretium's shares trade on the TSX and other Canadian exchanges, all of which are located in Ontario;

(c) the Impugned Documents were disseminated in and from Ontario;

(d) a substantial proportion of the Class Members reside in Ontario; and

(e) a portion of the damages sustained by the Class were sustained by persons and entities domiciled in Ontario.

SERVICE OUTSIDE OF ONTARIO

113. The Plaintiff may serve this Second Fresh as Amended Statement of Claim outside of Ontario without leave in accordance with rule 17.02 of the *Rules of Civil Procedure*, because this claim is:

(a) a claim in respect of personal property in Ontario (para 17.02(a));

(b) a claim in respect of damage sustained in Ontario (para 17.02(h));

(c) a claim against a person ordinarily resident or carrying on business in Ontario (para 17.02(p)).

RELEVANT LEGISLATION, PLACE OF TRIAL AND JURY TRIAL

114. The Plaintiff pleads and relies upon the *CJA*, the *CPA*, the *OSA* and the Other Canadian Securities Legislation.

115. The Plaintiff proposes that this action be tried in the City of Toronto, in the Province of Ontario, as a proceeding under the *CPA*.

116. The Plaintiff intends to serve a jury notice.

January 22, 2018

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Lawyers for the Plaintiff

DAVID WONG Plaintiff	and	**PRETIUM RESOURCES INC., *et al*** Defendants	Court File No.: CV-13-00491800-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at Toronto

Proceeding under the *Class Proceedings Act, 1992*

SECOND FRESH AS AMENDED STATEMENT OF CLAIM

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Lawyers for the Plaintiff

SCHEDULE "B"

Court File No.: CV-13-00491800-CP

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

DAVID WONG

Plaintiff

and

PRETIUM RESOURCES INC. and ROBERT A. QUARTERMAIN

Defendants

Proceeding under the *Class Proceedings Act, 1992*

LITIGATION PLAN

ARTICLE ONE
DEFINITIONS

1.01 The capitalized terms throughout this Plan have the meanings indicated below:

(a) "**Action**" means this action, bearing Ontario Superior Court of Justice File Number CV-13-00491800-CP;

(b) "**Administrator**" means a person appointed by the court to carry out the functions described in the **Plan**;

(c) "**CI Notice**" means the notice of the resolution of the common issues;

(d) "***CJA***" means the *Courts of Justice Act,* R.S.O. 1990, c. C.43, as amended;

(e) "**Claim Form**" means a form to be approved by the Court, to be completed by the **Class Members** and submitted to the **Administrator** in order for the **Class Members** to participate in the procedure described herein;

(f) "**Claims Deadline**" means the date by which each **Class Member** must file a **Claim Form**;

(g) "**Class**" or "**Class Members**" means all persons, other than **Excluded Persons**, who: (1) purchased **Pretium** common shares listed on the **TSX** during the **Class Period** and held some or all of those common shares at the close of trading on October 8, 2013, or October 21, 2013; or (2) resided in Canada during the Class Period and purchased **Pretium** common shares during the **Class Period** on the NYSE, and held some or all of those common shares at the close of trading on October 8, 2013, or October 21, 2013;

(h) "**Class Counsel**" means Morganti & Co. P.C.;

(i) "**Class Counsel Representative**" means a designated member of **Class Counsel** who will oversee the claims process described herein;

(j) "**Class Period**" means (1) the period from and including July 23, 2013, to and including October 8, 2013, or October 21, 2013;

(k) "**Company**" means **Pretium**;

(l) "**Corrective Disclosures**" means **Pretium**'s statements released on October 9, 2013, and on October 22, 2013;

(m) "***CPA***" means the *Class Proceedings Act, 1992*, S.O. 1992, c. 6;

(n) "**Excluded Persons**" means **Pretium**, **Quartermain**, **Pretium**'s past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal

representatives, heirs, predecessors, successors and assigns, and any member of **Quartermain**'s family;

(o) "Impugned Documents" means core documents released by Pretium on July 23, August 1, August 15, September 9, September 23, October 3, or October 9, 2013

(p) "**MD&A**" means **Pretium**'s Management's Discussion and Analysis released on SEDAR on August 1, 2013;

(q) "**NI 51-102**" means National Instrument 51-102: *Continuous Disclosure Obligations*;

(r) "**Notice**" means the notice of certification;

(s) "**Notice Program**" means the method of distributing the **Notice**;

(t) "**NYSE**" means the New York Stock Exchange;

(u) "***OSA***" means the *Securities Act*, R.S.O. 1990, c. S.5, as amended;

(v) "**Plaintiff**" means David Wong;

(w) "**Plan**" means this litigation plan;

(x) "**Pretium**" means Pretium Resources Inc.;

(y) "**Referee**" means a person or persons appointed by the Court to carry out the functions described in the **Plan**;

(z) "**SEC**" means the U.S. Securities and Exchange Commission;

(aa) "**SEDAR**" means the System for Electronic Document Analysis and Retrieval, a filing system for Canadian Securities Administrators;

(bb) "**TSX**" means the Toronto Stock Exchange; and

(cc) "**Website**" means a dedicated website located within Class Counsel's website located at www.morgantico.com.

ARTICLE TWO
SCOPE AND STATUS OF THE ACTION

SCOPE OF THE ACTION

2.01 The Plaintiff seeks to represent a class of persons defined as:

All persons, other than Excluded Persons, who:

i. purchased Pretium common shares listed on the TSX during the Class Period and held some or all of those common shares at the close of trading on October 8, 2013, or October 21, 2013; or

ii. resided in Canada during the Class Period and purchased Pretium common shares during the Class Period on the NYSE, and held some or all of those common shares at the close of trading on October 8, 2013, or October 21, 2013.

STATUS OF THE ACTION

2.02 Class Counsel's lawyers are representing the Plaintiff.

2.03 The Action was assigned to the Honourable Justice Edward P. Belobaba.

2.04 The motion for leave to proceed pursuant to Part XXIII.1 of the *OSA* was granted with reasons released on July 20, 2017. The Defendants' motion to appeal was denied by the Divisional Court on December 1, 2017.

2.05 Subject to Court approval, the Defendants have consented to this action being certified as a class proceeding, as well as the other relief sought in the certification order.

2.06 The Defendants have indicated that they intend to move for summary judgment on the issue of liability and the Plaintiff has agreed to the determination of this motion following the completion of examinations for discovery.

ARTICLE THREE
REPORTING TO AND COMMUNICATING WITH PUTATIVE CLASS MEMBERS

3.01 Class Counsel will report material developments in this action to the Class Members through the Website. Copies of select Court documents, Court decisions, notices, documentation and other information relating to the Action will be posted on, or accessible from the Website. This will allow the Class Members, wherever they reside, to be kept informed of the status of the action.

3.02 The Website will also:

(a) contain a feature that will permit Class Members to submit inquiries to Class Counsel. These inquiries will be sent directly to a designated member of Class Counsel who will respond; and

(b) provide a list of direct email addresses permitting Class Members to make inquiries to Class Counsel.

ARTICLE FOUR
LITIGATION SCHEDULE PRIOR TO THE COMMON ISSUES TRIAL

NOTICE OF CERTIFICATION OF THE ACTION AS A CLASS PROCEEDING AND THE OPT-OUT PROCEDURE

4.01 The Plaintiff proposes that the notice of certification given as set out in the Notice Plan.

OPTING OUT

4.02 The certification order will fix a date and method by which putative Class Members may exclude themselves from the Class. Class counsel intend to request that the Court appoint Trilogy Class Action Services, a class action administration firm in Toronto, to receive the opt-out notices and report the names and addresses of all persons who opted out to the court, Class Counsel and counsel for the Defendants.

DOCUMENT EXCHANGE AND MANAGEMENT

4.03 Affidavits of documents will be exchanged in accordance with the *Rules of Civil Procedure* ("*Rules*"). Documentary production will be exchanged as agreed to by the parties informed by the *Rules*, and relevant e-discovery principles.

4.04 Class Counsel will use data management systems, hosted by Precision Discovery Corp., to organize, code and manage the documents produced by Pretium and all documents in the possession of the Plaintiff and obtained from Class Members, if any.

EXAMINATION FOR DISCOVERY

4.05 The Plaintiff intends to examine a representative from Pretium for discovery, but cannot, until the production of documents has been completed, estimate the time required for such examination, including undertakings and refusals.

4.06 The Plaintiff may decide to ask the Court for an order to examine more than one representative of Pretium and for an order to examine a representative of Snowden

Mining Industry Consultants Inc. and Strathcona Mineral Services Ltd. The Defendants reserve the right to oppose such motion.

4.07 The Defendants may examine the Plaintiff for discovery.

EXPERT REPORTS

4.08 Class Counsel anticipate delivering expert reports from an accountant or economist for the calculation of damages for each Class Member.

4.09 All expert reports will be exchanged in accordance with the *Rules*, unless the Court orders otherwise.

CLARIFICATION OF THE COMMON ISSUES

4.10 Before the trial of the common issues, the Plaintiff or Defendants may ask the Court for an order to clarify and/or redefine the common issues.

MOTIONS

4.11 Although no motions other than those indicated in this Plan are currently anticipated by the Plaintiff, additional motions may be required and may be scheduled as the action progresses.

ARTICLE FIVE
TRIAL OF THE COMMON ISSUES

5.01 If the Court certifies the common issues that the Plaintiff has proposed, the common issues trial or motion for Summary Judgment will determine the common issues set out in the certification order.

ARTICLE SIX
LITIGATION STEPS FOLLOWING THE COMMON ISSUES TRIAL

CLASS COUNSEL REPRESENTATIVE

6.01 The Class Counsel Representative will oversee the claims procedure described herein, liaise with the Administrator and the Referee as required and, when necessary, report to the Court. The Class Counsel Representative will be paid for these services in a manner to be approved by the Court.

INDIVIDUAL CLASS MEMBER PARTICIPATION AFTER THE TRIAL OF THE COMMON ISSUES

6.02 Assuming that the common issues are resolved in favour of the Plaintiff, it will be necessary for the Court to supervise an individual issues determination or a claims procedure. The structure and content of the foregoing will depend upon the findings of the judge at the common issues trial.

THE CLAIMS PROCESS

6.03 The structure of the claims process will depend upon the findings of the common issues trial or motions judge.

6.04 If the Court finds that the Defendants are liable to the Class Members pursuant to section 138.3 of the *OSA* and the analogous provisions in the Equivalent Securities Acts, the Plaintiff will propose to the Court, for approval, that the measure of damages found within s. 138.5 of the *OSA* be followed by the Claims Administrator.

6.05 With respect to the Common Law Claim, it will be necessary to quantify the elements of reliance and damages. The Class Members will be provided the opportunity to come forward to prove the individual issue of reliance and their damages in a manner to be approved by the Court.

THE REPORTS FROM THE ADMINISTRATOR TO THE COURT

6.06 The Administrator shall deliver reports to the Court as required. The subject matter of the reports will depend on the findings of the judge presiding over the common issues trial.

6.07 Copies of the Administrator's reports shall be served on Pretium and the Class Counsel Representative. The Administrator shall also report on a regular basis on the accumulating cost of administration.

6.08 The Administrator shall hold all amounts received from Pretium in trust, in a manner to be approved by the Court, until an order of the Court authorizes distribution in whole or in part.

DISTRIBUTION TO ELIGIBLE CLASS MEMBERS

6.09 As soon as practicable after the completion of the individual issues determination or claims procedure, the Administrator will, by motion, report to the Court the name and address of each Class Member, if any, entitled to receive a distribution and the amount of their share of the monies on hand, including their share of prejudgment interest (the "Distribution List").

6.10 The Distribution List shall be distributed and/or made accessible in accordance with the Court's directions.

6.11 Each Class Member whose name appears on the Distribution List shall comply with any condition precedent to distribution that the Court may impose.

6.12 The Court will authorize payments to those Class Members whose names are on the Distribution List.

6.13 If at the end of the distribution process there remain monies in the hands of the Administrator that have not been claimed, the Plaintiff and the Defendants will make submissions regarding the appropriate distribution of these monies.

ADMINISTRATOR'S FINAL REPORT TO COURT

6.14 After the Administrator completes the administration, it shall report to the Court and be discharged as the Administrator.

MOTION FOR DIRECTIONS

6.15 Class Counsel, the Defendants and the Administrator may apply at any time to the Court for directions.

ORDERS RELATING TO CLASS COUNSEL'S FEES AND THE COSTS OF ADMINISTRATION

6.16 After the trial of the common issues or motion for summary judgment, the Plaintiff may ask the Court to approve an agreement respecting fees and disbursements between he and Class Counsel. To the extent that the approved Class Counsel's fees, disbursements and applicable taxes are not completely paid by the costs recovered from Pretium, the Plaintiff will ask the Court to order that the unpaid balance be a first charge on any recovery either by way of aggregate or individual assessment.

6.17 If the Court awards damages in the aggregate, Class Counsel will ask the Court to order payment of their fees, disbursements and applicable taxes as a first charge on the aggregate amount.

6.18 If the Court does not award damages in the aggregate and requires the Class Members to prove their damages through individual assessments, Class Counsel will ask the Court to order payment of their fees, disbursements and applicable taxes as a first charge on the awards made at individual assessments.

6.19 Responsibility for payment of the costs incurred by the Class Counsel Representative and the Administrator will be determined by the Court.

FURTHER ORDERS CONCERNING THIS PLAN

6.20 This Plan may be amended from time-to-time by directions given at case conferences or by further order of the Court.

EFFECT OF THIS PLAN

6.21 This Plan shall be binding on all Class Members who do not opt-out in accordance with the procedure directed by the Court, whether or not they make a claim under the Plan.

SCHEDULE "C"

Court File No.: CV-13-00491800-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

DAVID WONG

Plaintiff

and

PRETIUM RESOURCES INC. and ROBERT A. QUARTERMAIN

Defendants

Proceeding under the *Class Proceedings Act, 1992*

NOTICE PLAN
(Notice of Certification)

1. Notice of Certification will be distributed and published in the following manner:

   a. The long-form notice of certification attached hereto as **Schedule "1"** (the "Long-Form Notice"), which will be available in English and French, will be sent by email or direct mail by Class Counsel to any person who has inquired about the Class Action;

   b. The Long-Form Notice will be posted by Class Counsel, in English and French, on the Morganti & Co. website: www.morgantico.com;

   c. The short-form notice of certification attached hereto as **Schedule "2"** (the "Short-Form Notice") will be distributed, in English, in the form of an

electronic press release using www.businesswire.com or an equivalent service; and

d. The Short-Form Notice will be published once in the following publications, subject to each having reasonable publication deadlines and costs:

   i. The national edition of *National Post*, Financial Post section, in English, in one-quarter page size;

   ii. The national edition of *The Wall Street Journal*, Business section, in English, in one-seventh page size;

   iii. *La Presse*, in French, in one-quarter page size; and

   iv. The monthly publication of *Better Finance*, a European-based association of national member organizations that promote shareholders' rights, in English, in one-seventh page size.

2. The cost of giving notice as set out in paragraph 1(d)(i) and (iii), above, will be paid 50% by Class Counsel and 50% by the Defendants. The balance of the cost of giving notice in accordance with paragraph 1, above, will be paid by Class Counsel.

SCHEDULE "1"

PRETIUM RESOURCES INC. SECURITIES CLASS ACTION NOTICE OF CERTIFICATION

Read this notice carefully as it may affect your legal rights

THE CLASS:

This Notice is directed to:

All persons and entities, other than Excluded Persons[1], who purchased Pretium Resources, Inc.'s ("Pretium") common shares listed on the Toronto Stock Exchange ("TSX"), and all Canadian-resident persons and entities who purchased Pretium's common shares listed on the New York Stock Exchange, during the period from July 23, 2013, to and including October 21, 2013, and who held some or all of those securities at the close of trading on October 8, 2013; or October 21, 2013 (the "Class" and "Class Member(s)").

[1]**Excluded Persons** means Pretium Resources Inc. and Robert A. Quartermain, and Pretium's past and present subsidiaries, affiliates, officers, directors, and any member of Quartermain's family;

SUMMARY OF THE CLAIMS:

The investor's claim alleges that Pretium and Quartermain released documents containing misrepresentations about the Company's business and operations at its Brucejack Mine. The lawsuit further alleges that when the Company issued statements correcting these misrepresentations on October 9, and 22, 2013, the price of Pretium's stock declined to reflect the true state of events, thereby harming Class Members.

The claim seeks monetary damages for the Class Members measured as a portion of the drop in value of Pretium common shares on October 9 and 22, 2013. If the claim succeeds, Class Members may be eligible to receive compensation from Pretium and Quartermain for damage or loss which they may have incurred as a result of the alleged misrepresentations. A copy of the latest version of the Statement of Claim, as well as other legal documents associated with this action, can be found at www.morgantico.com.

THE CERTIFICATION ORDER:

On _____, 2019, the Honourable Justice Belobaba of the Ontario Superior Court of Justice certified the action: *Wong v. Pretium Resources*, Court File No.: CV-13-00491800-CP (the "Class Action") as a class proceeding against Pretium and Quartermain on consent, and appointed David Wong as the representative Plaintiff.

The Class Action has been certified on behalf of the Class (described above) composed of "Class Members" other than Excluded Persons.

WHAT DOES CERTIFICATION MEAN:

The Certification Order means that the claims may proceed to pre-trial discovery and may eventually advance to trial as a class action on behalf of all Class Members for damages arising out of alleged misrepresentations.

Certification is a procedural step that defines the form of the litigation and the common issues to be resolved, allowing the litigation to be pursued on behalf of the Class.

The substance of the litigation (i.e. the allegation that the Defendants made misrepresentations in their public disclosure documents) has not been adjudicated by the Court. The Defendants deny the allegations made against them.

WHO IS INCLUDED IN THE LAWSUIT:

YOU DO NOT NEED TO DO ANYTHING TO PARTICIPATE IN THE CLASS ACTION

Class Members are automatically included in a class action once certified, and you do not need to do anything at this time if you wish to participate in this Class Action. You are welcome, however, to contact Class Counsel to ask questions without charge.

You will not be required to pay any costs in the event that this Class Action is unsuccessful.

YOU MUST OPT-OUT IF YOU DO NOT WANT TO BE BOUND BY THE OUTCOME OF THE CLASS ACTION

Class Members who wish to pursue their own action or who do not want to be bound by the outcome of the Class Action **MUST OPT-OUT of the Class Action.**

If you want to opt-out of the Class Action, you must send an OPT-OUT FORM stating that you elect to opt-out of the Class in the Pretium Resources Inc. Class Action.

The Opt-Out Form is available at www.morgantico.com, or by calling Morganti & Co., P.C. at (647) 344-1900. Any Class Member who wishes to opt-out of the Class Action shall deliver a completed Opt-Out Form by email to Paul@trilogyclassactions.ca or by regular mail or courier to:

Trilogy Class Action Services
Attn: Paul Battaglia
51 Jackes Avenue, Suite 102
Toronto Ontario, M4T 1E2

The Opt-Out Form must be postmarked if sent by mail, or received if sent by e-mail or courier, on or before_____, 2019 at 5:00pm E.S.T.

Each Class Member who does not opt-out of the Class Action will be bound by the terms of any judgement or settlement, whether favourable or not, and will not be allowed to pursue an independent action. If the Class Action is successful, you may be entitled to share in the amount of any award or settlement recovered. In order to determine if you are entitled to share in the award or settlement and the amount, if any, of your share, it may be necessary to conduct an individual determination. There may be costs payable by you if you submit a claim and it is determined that you are not entitled to share in the award or settlement.

If you wish to pursue other claims against the Defendants relating to the matters at issue in the Class Action, you should immediately seek independent legal advice. If you do not exclude yourself from participating in this Class Action, all of your claims relating to the subject matter of this litigation will be determined by the result obtained in the Class Action, whether by settlement or judgement.

Please see the "Additional Information" section for directions to obtain further detail on the scope of the certified Class Action and the claims that will be advanced against the Defendants.

ADDITIONAL INFORMATION:

This Notice was approved by the Ontario Superior Court of Justice. The Court office cannot answer any questions about the matters in this Notice. The order of the Court and other information are available at www.morgantico.com.

Questions relating to the Class Action should be directed by email or telephone to Trilogy Class Action Services:

Trilogy Class Action Services
Attn: Paul Battaglia
51 Jackes Avenue, Suite 102
Toronto Ontario, M4T 1E2
Tel: 877-644-3088
Email: Paul@trilogyclassactions.ca

The publication of this notice was authorized by the Ontario Superior Court of Justice. Questions about this Notice should NOT be directed to the Court.

SCHEDULE "2"

Read this notice carefully as it may affect your legal rights

PRETIUM RESOURCES INC. SECURITIES CLASS ACTION NOTICE OF CERTIFICATION

This Notice is directed to:
All persons and entities, other than Excluded Persons[1], who purchased Pretium Resources, Inc.'s ("Pretium") common shares listed on the Toronto Stock Exchange ("TSX"), and all Canadian-resident persons and entities who purchased Pretium's common shares listed on the New York Stock Exchange, during the period from July 23, 2013, to and including October 21, 2013, and who held some or all of those securities at the close of trading on October 8, 2013; or October 21, 2013 (the "Class" and "Class Member(s)")
[1]**Excluded Person** means Pretium Resources Inc. and Robert A. Quartermain, and Pretium's past and present subsidiaries, affiliates, officers, directors, and any member of Quartermain's family.

This lawsuit alleges that Pretium and Quartermain released documents containing misrepresentations about the Company's business and operations at its Brucejack Mine. The lawsuit further alleges that when the Company issued statements correcting these misrepresentations on October 9, and 22, 2013, the price of Pretium's stock declined to reflect the true state of events, thereby harming Class Members.

On _____, 2019, the Honourable Justice Belobaba of the Ontario Superior Court of Justice certified the action: *Wong v. Pretium Resources*, Court File No.: CV-13-00491800-CP (the "Class Action") as a class proceeding against Pretium and Quartermain on consent, and appointed David Wong as the representative plaintiff. The substance of the litigation (i.e. that the Defendants made misrepresentations in their public disclosure documents in 2013) has not been adjudicated by the Court. The Defendants deny the allegations.

YOUR TWO OPTIONS:

1. **Do Nothing and Remain in the Class Action:**

   Class Members are automatically included in the action once certified if they do not opt-out. You do not need to do anything at this time to stay in the Class Action. If a settlement or any recovery or benefits are achieved for the Class and approved by the Court, you will be notified about how to ask for the portion to which you are entitled. You will be legally bound by all orders and judgments of the Court, and you will not be able to sue the Defendants on your own regarding the legal claims made in this case. You will **NOT** be required to pay any costs in the event that this Class Action is unsuccessful.

2. **Opt-Out of the Class Action:**

   All Class Members will be bound by all orders and judgments of the Court and any settlement reached unless they opt-out of the action. If you wish to pursue your own action or do not want to be bound by the outcome of the Class Action, **YOU MUST OPT-OUT OF THE CLASS ACTION.**

If you want to opt-out of the Class Action, you must fill out an Opt-Out Form (available at www.morgantico.com) and send it BEFORE _____, 2019, by email to paul@trilogyclassactions.ca.com or by regular mail or courier to Paul Battaglia at:

Trilogy Class Action Services
51 Jackes Avenue, Suite 102
Toronto, Ontario, M4T 1E2

A copy of the long-form notice providing greater detail about the certification and your right to opt-out of the action is available at http://www.morgantico.com.

Class members who seek the advice or guidance of their personal lawyers do so at their own expense.

The publication of this notice was authorized by the Ontario Superior Court of Justice. Questions about this notice should NOT be directed to the Court.

Court File No.: CV-13-00491800-CP

DAVID WONG
Plaintiff

and

PRETIUM RESOURCES INC. and ROBERT A. QUARTERMAIN
Defendants

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT **TORONTO**

NOTICE PLAN
(Notice of Certification)

MORGANTI & CO., P.C.
21 St. Clair Ave. E., Suite 1102
Toronto, ON M4T 1L9
Tel: (647) 344-1900
Fax: (416) 352-7638

Hadi Davarinia (LSO# 70266P)
hdavarinia@morgantilegal.com

1001 Woodward Ave., Ste. 500
Detroit, Michigan 48226
Tel: (248) 787-6078

Andrew J. Morganti (LSO# 57895E)
amorganti@morgantilegal.com

Lawyers for the Plaintiff

SCHEDULE "D"

OPT-OUT FORM

This is NOT a claim form. Completing this OPT-OUT FORM will **exclude you from the lawsuit and you will not receive any compensation arising out of any settlement or judgement in the class proceeding.**

To:

Trilogy Class Action Services
51 Jackes Avenue, Suite 102
Toronto, Ontario, M4T 1E2
Email: Paul@trilogyclassactions.ca

I understand that by opting-out, I am confirming that I do not wish to participate in the *Pretium Resources Inc.* securities class proceeding.

I understand that any individual action must be commenced within a specified limitation period or it will be legally barred.

I understand that certification of this class proceeding suspended the running of the limitation period from the time the class proceeding was filed. The limitation period will resume running against me if I opt-out of this class proceeding.

I understand that by opting-out, I take full responsibility for the resumption of the running of any relevant limitation period and for taking all necessary legal steps to protect any claim I may have.

***Optional*: Reason for Opting-Out:** Please explain your reason(s) for opting-out.

_____

_____

Trading Information: To the extent known, please specify in the space below the number of common shares (a) purchased between July 23, 2013, to and including October 8, 2013, and October 21, 2013, and (b) sold after October 8, 2013 and October 21, 2013.

_____

_____

_____

Date _____

_____ _____

Signature of Witness
Name:

Signature
Name:

_____ _____

Print Name

Print Name

If opting out on behalf of a corporation, by signing you acknowledge that you are an authorized signing officer.

Name of Corporation:

_____

Telephone: _____

Email: _____

Address: _____

_____

_____

Note: To opt-out, this form must be properly completed and postmarked if sent by mail, or received at the above address if sent by e-mail or courier, no later than _____, 2019.

Court File No.: CV-13-00491800-CP

DAVID WONG
Plaintiff

and

PRETIUM RESOURCES INC. and ROBERT A. QUARTERMAIN
Defendants

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT **TORONTO**

ORDER
(Certification) Kap

MORGANTI & CO., P.C.
21 St. Clair Ave. E., Suite 1102
Toronto, ON M4T 1L9
Tel: (647) 344-1900
Fax: (416) 352-7638

Hadi Davarinia (LSO# 70266P)
hdavarinia@morgantilegal.com

1001 Woodward Ave., Ste. 500
Detroit, Michigan 48226
Tel: (248) 787-6078

Andrew J. Morganti (LSO# 57895E)
amorganti@morgantilegal.com

Lawyers for the Plaintiff