

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE SOLTA MEDICAL, INC. STOCKHOLDERS) CONSOLIDATED
LITIGATION) C.A. No. 9170-CB

**NOTICE OF PENDENCY OF CLASS ACTION,
PROPOSED SETTLEMENT AND SETTLEMENT HEARING**

TO: ALL PERSONS OR ENTITIES WHO HELD SHARES OF THE COMMON STOCK OF SOLTA MEDICAL, INC. ("SOLTA" OR THE "COMPANY"), EITHER OF RECORD OR BENEFICIALLY, INCLUDING THEIR RESPECTIVE SUCCESSORS IN INTEREST, SUCCESSORS, PREDECESSORS IN INTEREST, PREDECESSORS, REPRESENTATIVES, TRUSTEES, EXECUTORS, ADMINISTRATORS, HEIRS, ASSIGNS OR TRANSFEREES, IMMEDIATE AND REMOTE, AND ANY PERSON OR ENTITY ACTING FOR OR ON BEHALF OF, OR CLAIMING UNDER, ANY OF THEM, AND EACH OF THEM, TOGETHER WITH THEIR PREDECESSORS AND SUCCESSORS AND ASSIGNS, (EXCLUDING DEFENDANTS NAMED IN THE ACTIONS AND THEIR IMMEDIATE FAMILY MEMBERS, ANY ENTITY CONTROLLED BY ANY OF THE DEFENDANTS, AND ANY SUCCESSORS IN INTEREST THERETO) AT ANY TIME BETWEEN AND INCLUDING DECEMBER 15, 2013 AND JANUARY 23, 2014 (THE "CLASS").

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. THIS NOTICE RELATES TO A PROPOSED SETTLEMENT OF A LAWSUIT AND CONTAINS IMPORTANT INFORMATION. YOUR RIGHTS WILL BE AFFECTED BY THESE LEGAL PROCEEDINGS IN THIS LITIGATION. IF THE COURT APPROVES THE PROPOSED SETTLEMENT, YOU WILL BE FOREVER BARRED FROM CONTESTING THE FAIRNESS OF THE PROPOSED SETTLEMENT, OR PURSUING THE SETTLED CLAIMS (AS DEFINED BELOW).

IF YOU WERE NOT THE BENEFICIAL HOLDER OF COMMON STOCK OF SOLTA BUT HELD SUCH STOCK FOR A BENEFICIAL HOLDER, PLEASE TRANSMIT THIS DOCUMENT PROMPTLY TO SUCH BENEFICIAL HOLDER.

The purpose of this Notice is to inform you of a proposed settlement (the "Settlement") of the above-captioned consolidated action (the "Action" or the "Delaware Action") pending before the Court of Chancery of the State of Delaware (the "Court"), and of a hearing to be held before the Court, in the New Castle County Courthouse, 500 North King Street, Wilmington, DE 19801, on September 29, 2014, at 10:00 a.m. (the "Settlement Hearing"). The purpose of the Settlement Hearing is to determine: (a) whether the Court should certify the Class for purposes of the Settlement; (b) whether the Court should approve the proposed Settlement; (c) whether the Court should enter an Order and Final Judgment dismissing the claims asserted in the Action on the merits and with prejudice as against Plaintiffs and the Class and effectuating the releases described below; (d) whether the Court should grant the application of Plaintiffs' Counsel for an award of attorneys' fees and reimbursement of litigation expenses; and (e) such other matters as may properly come before the Court.

If you are a member of the Class, this Notice will inform you of how, if you so choose, you may enter your appearance in the Action or object to the proposed Settlement and have your objection heard at the Settlement Hearing.

THE FOLLOWING RECITATION DOES NOT CONSTITUTE FINDINGS OF THE COURT AND SHOULD NOT BE UNDERSTOOD AS AN EXPRESSION OF ANY OPINION OF THE COURT AS TO THE MERITS OF ANY CLAIMS OR DEFENSES BY ANY OF THE PARTIES. IT IS BASED ON STATEMENTS OF THE PARTIES AND IS SENT FOR THE SOLE PURPOSE OF INFORMING YOU OF THE EXISTENCE OF THIS ACTION AND OF A HEARING ON A PROPOSED SETTLEMENT SO THAT YOU MAY DECIDE THE STEPS YOU MAY, OR MAY NOT, WISH TO TAKE IN RELATION TO THIS ACTION.

Background and Description of the Action

On December 16, 2013, Valeant Pharmaceuticals International, Inc. ("Valeant") and Solta Medical, Inc. ("Solta") announced that they had entered into an Agreement and Plan of Merger, dated as of December 15, 2013, providing for the acquisition of Solta by Valeant (the "Merger Agreement"). The Merger Agreement was entered into by and among, Valeant, Valeant Pharmaceuticals International ("VPI"), a wholly-owned subsidiary of Valeant, Sapphire Subsidiary Corp. ("Sapphire"), a wholly-owned subsidiary of VPI, and Solta. A copy of the Merger Agreement was filed with the United States Securities and Exchange Commission (the "SEC") on December 17, 2013.

Pursuant to the Merger Agreement, Sapphire commenced a cash tender offer on December 23, 2013 to acquire all shares of Solta's common stock for \$2.92 per share (the "Offer"). The Merger Agreement further provided that, following the consummation of the Offer, subject to customary conditions, Sapphire would be merged with and into Solta, with Solta becoming a wholly-owned subsidiary of VPI (the "Merger," and collectively with the Offer, the "Proposed Transaction").

On December 17, 2013, plaintiff Timothy Rosier ("Rosier"), a purported stockholder of Solta, filed his Verified Class Action Complaint in this Court, in an action captioned *Rosier v. Solta Medical, Inc., et al.*, C.A. No. 9170-CS (the "Rosier Action"), on behalf of himself and the public stockholders of Solta, challenging the Proposed Transaction and asserting claims against Solta, the members of its board of directors (the "Director Defendants," and with Solta, the "Solta Defendants"), Valeant, VPI and Sapphire (collectively, the "Valeant Defendants," and with the Solta Defendants, the "Defendants").

On December 18, 2013, plaintiff Martha Lathrop, a purported stockholder of Solta, filed a Class Action Complaint in the Superior Court of California for the County of Alameda (the "California Court"), in an action captioned *Lathrop v. Covert*, Case No.

HG13-707363 (the “Lathrop Action”), on behalf of herself and the public stockholders of Solta, challenging the Proposed Transaction and asserting claims against the Defendants.

On December 20, 2013, plaintiff Hope Walter, a purported stockholder of Solta, filed a Class Action Complaint in the California Court, in an action captioned *Walter v. Solta Medical, Inc.*, Case No. RG13-707659 (the “Walter Action”), on behalf of herself and the public stockholders of Solta, challenging the Proposed Transaction and asserting claims against the Defendants.

On December 23, 2013, Solta filed with the SEC a Solicitation/Recommendation Statement on Schedule 14D-9 (the “14D-9”), which, among other things, summarized the Merger Agreement and provided an account of the events leading up to the execution of the Merger Agreement and a summary of the valuation analyses conducted by Piper Jaffray & Co. (“Piper Jaffray”), the financial advisor to Solta’s board of directors.

On December 23, 2013, Valeant filed a Tender Offer Statement on Schedule TO with the SEC (the “Schedule TO”) that contained an Offer to Purchase for Cash All Outstanding Shares of Common Stock of Solta by the Valeant Defendants.

The Valeant Defendants and the Solta Defendants filed their answers to the complaint in the Rosier Action on December 23, 2013.

On December 24, 2013, the plaintiff in the Rosier Action served a First Request for the Production of Documents and Things to All Defendants and also served a Subpoena *Duces Tecum* and *Ad Testificandum* on Piper Jaffray.

On December 24, 2013, Sharon Frady Gurley (“Gurley,” together with Rosier, the “Delaware Plaintiffs”), a purported stockholder of Solta, filed her Verified Class Action Complaint for Breach of Fiduciary Duty in this Court, in an action captioned *Gurley v. Solta Medical, Inc., et al.*, C.A. No. 9201-CS (the “Gurley Action”), on behalf of herself and the public stockholders of Solta and asserting claims against Defendants.

On December 24, 2013, plaintiff Stephen Bushansky, a purported stockholder of Solta, filed a Class Action Complaint in the California Court, in an action captioned *Bushansky v. Solta Medical, Inc.*, Case No. RG13-707997 (the “Bushansky Action”), on behalf of himself and the public stockholders of Solta, challenging the Proposed Transaction and asserting claims against the Defendants.

The Lathrop Action, Walter Action and Bushansky Action collectively are referred to as the “California Actions,” and the Delaware Action and the California Actions together are referred to as the “Actions.”

On December 26, 2013, plaintiffs in the Walter Action filed a Class Action Amended Complaint.

On December 27, 2013, the Valeant Defendants filed their answer to the complaint in the Gurley Action.

Also on December 27, 2013, the Court granted an Order of Consolidation and Appointment of Co-Lead Counsel consolidating the Rosier Action and the Gurley Action into the Delaware Action.

Also on December 27, 2013, plaintiffs in the California Actions (the “California Plaintiffs,” together with the Delaware Plaintiffs, the “Plaintiffs”) agreed to defer to proceedings in the Delaware Action through the closing of the Offer in exchange for access to any discovery produced in the Delaware Action.

On December 30, 2013, the Court granted a Stipulation and Order for the Production and Exchange of Confidential and Highly Confidential Information.

Also on December 30, 2013, the Delaware Plaintiffs filed a Consolidated Verified Amended Class Action Complaint (the “Complaint”).

The Complaint alleges that, among other things, the Director Defendants breached their fiduciary duties in connection with the Proposed Transaction because they failed to secure the best available value for Solta stockholders, engaged in an inadequate process, and because the disclosures in the 14D-9 concerning the Proposed Transaction were materially misleading and incomplete, and that Solta, Valeant, VPI and Sapphire aided and abetted such breaches of fiduciary duty.

Between December 30, 2013 and January 9, 2014, counsel for the Plaintiffs in the Actions (“Plaintiffs’ Counsel”) conducted expedited discovery relevant to the claims asserted in the Actions that included a review of over 7,000 pages of non-public documents from the Solta Defendants, as well as the depositions of Mark M. Sieczkarek, Chairman and Chief Executive Officer of Solta, on January 9, 2014, and Robert Anderson, a Principal at Piper Jaffray, on January 9, 2014.

The Delaware Plaintiffs filed a Motion for Preliminary Injunction and supporting briefing and evidentiary support in the Delaware Action on January 10, 2014.

Plaintiffs engaged and consulted with financial experts in connection with their prosecution of the Actions and their assessment of the claims set forth therein and the potential resolution of those claims.

Counsel for the parties to the Actions engaged in arm’s-length discussions and negotiations concerning a possible settlement of the Actions.

Plaintiffs in each of the Actions represent to have owned at all relevant times and continued to own shares of Solta common stock through the consummation of the Proposed Transaction, for which proof of ownership was provided to Defendants' counsel.

After arm's-length negotiations, counsel to the parties in the Actions reached an agreement-in-principle concerning the proposed settlement of the Actions. Those extensive negotiations and discussions led to the execution of a memorandum of understanding (the "MOU") on January 11, 2014. The MOU provided for an agreement in principle to settle the Actions (the "Settlement"), subject to additional confirmatory discovery and approval of the Court, on the basis of the inclusion of additional disclosures in a new Schedule 14D-9 in the form attached hereto as Exhibit A, which was filed with the SEC on January 13, 2014.

On January 13, 2014, the parties notified the Court of the MOU and of Plaintiffs' intention to conduct confirmatory discovery relating to the proposed Settlement.

On January 13, 2014, the Delaware Plaintiffs withdrew their Motion for a Preliminary Injunction.

On January 23, 2014 the Proposed Transaction was consummated.

Following the execution of the MOU, and as contemplated therein, Plaintiffs' Counsel conducted a further investigation of the facts and circumstances underlying the claims asserted in the Actions, which included, among other things, reviewing and analyzing additional documents produced by Defendants and conducting the deposition of Eric Stang, one of Solta's independent directors and the chairman of its Technology Committee, on April 22, 2014.

Plaintiffs believe that their claims had substantial merit when filed and that the Motion for Preliminary Injunction sought appropriate relief for their claims.

On the basis of information available to them, including publicly available information, non-public information provided in discovery in the Actions, and consultations with an independent financial advisor retained by Plaintiffs' Counsel, Plaintiffs' Counsel believe that the additional disclosures reflected in Exhibit A provided the Company's stockholders with substantial benefits in connection with allowing for a superior opportunity to make fully informed decisions as to the Offer and as to any potential appraisal rights in connection with the Proposed Transaction under 8 Del. C. § 262, and further substantially addressed their concerns as set forth in the Complaint and the Motion for Preliminary Injunction, and have determined that the Settlement described herein is fair, reasonable, adequate, and in the best interests of the Plaintiffs and the Class (as defined herein).

Solta, Mark M. Sieczkarek, Cathy L. McCarthy, David B. Holthe, Eric B. Stang, Harold L. Covert, Linda Graebner, Valeant, VPI, and Sapphire each has denied, and continues to deny, that he, she, or it committed or aided and abetted the commission of any breach of fiduciary duty or violation of any other law, or engaged in any of the wrongful acts alleged in the Actions and the various complaints, and expressly maintains that he, she, or it diligently and scrupulously complied with his, her, or its fiduciary and other legal duties, to the extent such duties exist, and is entering into this Settlement solely to eliminate the burden, expense, and uncertainties inherent in further litigation.

In connection with settlement discussions and negotiations leading to the proposed Settlement, counsel for the parties in the Actions did not discuss the appropriateness or amount of any application by Plaintiffs' Counsel for an award of attorneys' fees and expenses until the substantive terms of the Settlement on behalf of and for the benefit of the Class (defined below) and all other elements of the Stipulation and Agreement of Compromise, Settlement and Release entered into by the parties in the Actions and dated July 10, 2014 (the "Stipulation") had been negotiated at arm's-length and agreed upon.

On July 14, 2014, the Court entered a scheduling order providing for, among other things, the scheduling of the Settlement Hearing; the temporary certification, for settlement purposes only, of a non-opt out Class pursuant to Delaware Court of Chancery Rules 23(a), and 23(b)(1) and (b)(2), defined as any and all record and beneficial holders of Solta common stock, their respective successors in interest, successors, predecessors in interest, predecessors, representatives, trustees, executors, administrators, heirs, assigns or transferees, immediate and remote, and any person or entity acting for or on behalf of, or claiming under, any of them, and each of them, together with their predecessors and successors and assigns, who held shares of Solta common stock (excluding defendants named in the Actions and their immediate family members, any entity controlled by any of the defendants, and any successors in interest thereto) at any time between and including December 15, 2013 and January 23, 2014; a stay of the Action pending a hearing on the proposed Settlement; and an injunction against the commencement or prosecution of any action by any member of the Class asserting any of the claims subject to the Settlement of the Actions.

Reasons for the Settlement

On the basis of information available to them, including publicly available information, the additional discovery described herein, consultations with independent financial advisors retained by Plaintiffs' Counsel, and in consideration of the strengths and weaknesses of their claims, Plaintiffs' Counsel has determined that the Settlement described herein is fair, reasonable, adequate, and in the best interests of the Plaintiffs and the Class because it empowered the stockholders of Solta to make a fully informed decision on whether to tender their shares into the Offer.

Each of the Defendants has denied, and continues to deny, that he or it committed or aided and abetted the commission of any breach of fiduciary duty or any other law, or engaged in any of the wrongful acts alleged in the Actions, and expressly maintains that he or it diligently and scrupulously complied with his or its fiduciary and other legal duties, to the extent such duties exist, and is entering into the Settlement solely to eliminate the burden, expense, and uncertainties inherent in further litigation.

The parties wish to settle and resolve the claims asserted by Plaintiffs and all claims relating to or arising out of the Proposed Transaction, and the parties have, following arm's-length negotiations, reached an agreement in principle providing for the settlement of the Actions, and the parties believe the Settlement is in the best interests of the parties and the Solta public stockholders.

Settlement Terms

In consideration for the full settlement and release of all Settled Claims (as defined below) and the dismissal with prejudice of the Actions, Solta agreed to provide, and did provide, additional disclosures in its Solicitation/Recommendation Statement on Schedule 14D-9 concerning the Proposed Transaction, in the form attached hereto as Exhibit A, which was filed with the SEC on January 13, 2014. This filing can be found on the SEC's EDGAR database at the follow URL:
<http://www.sec.gov/Archives/edgar/data/1171298/000119312514008809/d656988dsc14d9a.htm>

Without admitting any wrongdoing, Defendants acknowledge that the prosecution of the Actions and discussions with Plaintiffs' Counsel were the principal cause of the decision to make the supplemental disclosures reflected in Exhibit A.

The Settlement Hearing

The Settlement Hearing shall be held on September 29, 2014, at 10:00 a.m., in the New Castle County Courthouse, 500 North King Street, Wilmington, DE 19801 to: (a) determine whether the temporary class action certification herein should be made final; (b) determine whether the Settlement should be approved by the Court as fair, reasonable, adequate and in the best interests of the Class; (c) determine whether an Order and Final Judgment should be entered pursuant to the Stipulation; (d) consider Plaintiffs' Counsel's application for an award of attorneys' fees and expenses; and (e) rule on such other matters as the Court may deem appropriate.

The Court reserves the right to adjourn the Settlement Hearing or any adjournment thereof, including the consideration of the application for attorneys' fees, without further notice of any kind other than oral announcement at the Settlement Hearing or any adjournment thereof.

The Court reserves the right to approve the Settlement at or after the Settlement Hearing with such modification(s) as may be consented to by the Parties to the Stipulation and without further notice to the Class.

Right To Appear and Object

Any member of the Class who objects to the Settlement, the Order and Final Judgment to be entered in the Action, and/or Plaintiffs' Counsel's application for attorneys' fees, or who otherwise wishes to be heard, may appear in person or by his attorney at the Settlement Hearing and present evidence or argument that may be proper and relevant; provided, however, that, except for good cause shown, no person shall be heard and no papers, briefs, pleadings or other documents submitted by any person shall be considered by the Court unless not later than ten (10) calendar days prior to the Settlement Hearing such person files with the Court and serves upon counsel listed below: (a) a written notice of intention to appear; (b) a statement of such person's objections to any matters before the Court; and (c) the grounds for such objections and the reasons that such person desires to appear and be heard, documentation evidencing membership in the Class, as well as all documents or writings such person desires the Court to consider. Such filings shall be served upon the following counsel:

Seth D. Rigradsky
Brian D. Long
Gina M. Serra
RIGRODSKY & LONG, P.A.
2 Righter Parkway, Suite 120
Wilmington, DE 19803

*Co-Lead and Co-Liaison Counsel for
Delaware Plaintiffs*

Edward B. Micheletti
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SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636

Attorneys for the Valeant Defendants

R. Judson Scaggs, Jr.
Shannon E. German
MORRIS, NICHOLS, ARSHT
& TUNNELL LLP
1201 North Market St.
P.O. Box 1347
Wilmington, DE 19899-1347

Attorneys for the Solta Defendants

and subsequently filed with the Register in Chancery, 500 North King Street, Wilmington, DE 19801.

Unless the Court otherwise directs, no person shall be entitled to object to the approval of the Settlement, any judgment entered thereon, the adequacy of the representation of the Class by Plaintiffs and Plaintiffs' Counsel, any award of attorneys' fees, or otherwise be heard, except by serving and filing a written objection and supporting papers and documents as prescribed above. Any person who fails to object in the manner described above shall be deemed to have waived the right to object (including any right of appeal) and shall be forever barred from raising such objection in this or any other action or proceeding. Any member of the Class who does not object to the Settlement or the request by Plaintiffs' Counsel for an award of attorneys' fees and expenses (described below) or to any other matter stated above need not do anything.

The Final Order and Judgment

If the Court determines that the Settlement, as provided for in the Stipulation, is fair, reasonable, adequate and in the best interests of the Class, the parties to the Action will ask the Court to enter the Order and Final Judgment, which will, among other things:

- a. approve the Settlement as fair, reasonable, adequate and in the best interests of the Class and direct consummation of the Settlement in accordance with its terms and conditions;
- b. permanently certify the Class as a non-opt out class pursuant to Delaware Court of Chancery Rules 23(a), and 23(b)(1) and (b)(2) and designate Plaintiffs in the Action as the class representatives (Co-Lead and Co-Liaison Counsel were designated as such in the Order of Consolidation and Appointment of Co-Lead Co-Liaison Counsel which the Court granted on December 27, 2013);
- c. determine that the requirements of the rules of the Court and due process have been satisfied in connection with this Notice;
- d. dismiss the Action with prejudice on the merits and grant the releases more fully described below in accordance with the terms and conditions of the Stipulation;
- e. permanently bar and enjoin Plaintiffs and all members of the Class from instituting, commencing or prosecuting any of the Settled Claims against any of the Released Persons (as defined below); and
- f. award attorneys' fees and expenses to Plaintiffs' Counsel.

Releases

The Stipulation provides that upon Final Approval of the Settlement and in consideration of the benefits provided by the Settlement:

- a. The Order and Final Judgment shall, among other things, provide for the full and complete dismissal of the Action with prejudice, and the settlement and release of, and a permanent injunction barring, among other things, any claims, demands, rights, actions, causes of action, liabilities, damages, losses, obligations, judgments, duties, suits, costs, expenses, matters, and issues known or unknown, contingent or absolute, suspected or unsuspected, disclosed or undisclosed, liquidated or unliquidated, matured or unmatured, accrued or unaccrued, apparent or unapparent, that have been or could have been, asserted in any court, tribunal, or proceeding (including but not limited to any claims arising under federal, state, foreign, or common law, including the federal securities laws and any state disclosure law), by or on behalf of Plaintiffs or any member of the Class, whether individual, direct, class, derivative, representative, legal, equitable, or any other type or in any other capacity (collectively, the "Releasing Persons") against the Defendants or any of their families, parent entities, controlling persons, associates, affiliates, or subsidiaries and each and all of their respective past or present officers, directors, stockholders, principals, representatives, employees, attorneys, financial or investment advisors, consultants, accountants, investment bankers, commercial bankers, entities providing fairness opinions, advisors or agents, heirs, executors, trustees, general or limited partners or partnerships, limited liability companies, members, joint ventures, personal or legal representatives, estates, administrators, predecessors, successors, or assigns (the "Released Persons") which the Releasing Persons ever had, now have, or may have had by reason of, arising out of, relating to, or in connection with the acts, events, facts, matters, transactions, occurrences, statements, or representations, or any other matter whatsoever set forth in or otherwise related, directly or indirectly, to the allegations in the Actions, the complaints, the Merger Agreement, and other transactions contemplated therein, or disclosures made in connection therewith (including the adequacy and completeness of such disclosures) (the "Settled Claims"); provided, however, that the Settled Claims shall not include any properly perfected claims for appraisal pursuant to 8 *Del. C.* § 262, or claims to enforce the Settlement. Defendants release all claims against Plaintiffs or their agents, including Plaintiffs' Counsel, arising out of or relating to the investigation, institution, prosecution, and resolution of the Actions.
- b. Plaintiffs acknowledge, and the members of the Class by operation of law shall be deemed to have acknowledged, that they may discover facts in addition to or different from those now known or believed to be true by them with respect to the Settled Claims, but that it is the intention of Plaintiffs, and by operation of law the intention of the members of the Class, to completely, fully, finally and forever compromise, settle, release, discharge, extinguish, and dismiss any and all Settled Claims, known or unknown, suspected or unsuspected, contingent or absolute, accrued or unaccrued, apparent or unapparent, which now exist, or heretofore existed, or may hereafter exist, and without regard to the subsequent discovery of additional or different facts. Plaintiffs acknowledge, and the members of the Class by operation of law shall be deemed to have acknowledged, that "Unknown Claims" are expressly included in the definition of "Settled Claims," and that such inclusion was expressly bargained for and was a key element of the Settlement and was relied upon by each and all of the Released Persons in entering into this Stipulation. "Unknown Claims" means any claim that Plaintiffs or any member of the Class does not know or suspect exists in his, her or its favor at the time of the release of the Settled Claims as against the Released Persons, including without limitation those which, if known, might have affected the decision to enter into the Settlement. With respect to any of the Settled Claims, the parties stipulate and agree that upon Final Approval of the Settlement, Plaintiffs shall expressly and each member of the Class shall be deemed to have, and by operation of the final order and judgment by the Court shall have, expressly waived, relinquished and released any and all provisions, rights and benefits conferred by or under Cal. Civ. Code § 1542 or any law of the United States or any state

of the United States or territory of the United States, or principle of common law, which is similar, comparable or equivalent to Cal. Civ. Code § 1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR.

Plaintiffs acknowledge, and the members of the Class shall be deemed by operation of the entry of a final order and judgment approving the Settlement to have acknowledged, that the foregoing waiver was separately bargained for, is an integral element of the Settlement, and was relied upon by each and all of the Defendants in entering into the Settlement.

- c. The California Actions shall be dismissed with prejudice within five (5) business days of the date of Final Approval as defined in Paragraph 14 of the Stipulation.

Application for Attorneys' Fees and Expenses

As set forth in the Stipulation, Plaintiffs' Counsel in the Actions intend to seek an award of attorneys' fees and expenses up to but not exceeding \$400,000 in the aggregate (the "Requested Fee Award"). Defendants agree not to oppose an award of attorneys' fees and expenses to Plaintiffs' Counsel in the Actions up to but not exceeding \$400,000 in the aggregate. The California Plaintiffs' Counsel are entitled to a portion of the Requested Fee Award as agreed between the Plaintiffs' Counsel in the Actions and Defendants take no position regarding the distribution of the Requested Fee Award amongst Plaintiffs' Counsel. The California Plaintiffs' Counsel are waiving any ability to seek a portion of the Requested Fee Award in the California Court and instead will join the Delaware Plaintiffs' Counsel in their application for the Requested Fee Award in the Delaware Court of Chancery. Any fees and expenses awarded by this Court in connection with the Settlement shall be payable within ten (10) business days of the entry of an order awarding them, subject to Plaintiffs' Counsel's joint and several obligations to refund or repay any amount paid if, as a result of any appeal and/or further proceedings on remand, or successful collateral attack, the amount is lowered, overturned, or reduced. Any failure of the Court to approve the Requested Fee Award in whole or in part shall not affect the remainder of the Settlement.

Except for the costs of providing and administering this Notice, Plaintiffs and Plaintiffs' Counsel shall bear their own fees, costs and expenses.

Notice to Persons or Entities That Held Ownership on Behalf of Others

Brokerage firms, banks and/or other persons or entities who held shares of the common stock of Solta during the period from and including December 15, 2013 and January 23, 2014, for the benefit of others are requested to promptly send this Notice to all of their respective beneficial owners. If additional copies of the Notice are needed for forwarding to such beneficial owners, any requests for such copies may be made to In re Solta Medical, Inc. Stockholders Litigation, c/o GCG, P.O. Box 10101, Dublin, OH 43017-3101.

Scope of this Notice and Additional Information

The foregoing description of the Settlement Hearing, the Actions, the terms of the proposed Settlement and other matters described herein do not purport to be comprehensive. Accordingly, members of the Class are referred to the documents filed with the Court in the Action. **PLEASE DO NOT WRITE OR CALL THE COURT.** Inquiries or comments about the Settlement may be directed to the attention of Plaintiffs' Counsel as follows:

Brian D. Long
Gina M. Serra
RIGRODSKY & LONG, P.A.
2 Righter Parkway, Suite 120
Wilmington, DE 19803
Tel.: (302) 295-5310

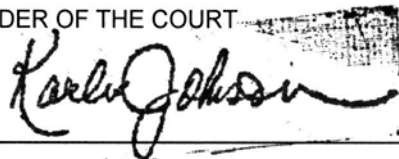
Co-Lead and Co-Liaison Counsel for Delaware Plaintiffs

Donald J. Enright
LEVI & KORINSKY, LLP
1101 30th Street, N.W., Suite 115
Washington, DC 20007
Tel. (202) 524-4290

Co-Lead Counsel for Delaware Plaintiffs

Dated: August 1, 2014

BY ORDER OF THE COURT

A handwritten signature in black ink, appearing to read "Karla Johnson", is written over a horizontal line. To the right of the signature is a rectangular stamp with some illegible text and a date.