

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KENNETH MCGUIRE and DAVID WILCZYNSKI, on  
Behalf of Themselves and All Others Similarly Situated,

Plaintiffs,

vs.

DENDREON CORPORATION, a Delaware Corporation,  
MITCHELL GOLD, and DAVID URDAL,

Defendants.

Civil Action No. C07-800 MJP

CLASS ACTION

## DENDREON SETTLEMENT

### PROOF OF CLAIM AND RELEASE

#### GENERAL INSTRUCTIONS

To recover as a member of the Class based on your claims in the action entitled *McGuire, et al. v. Dendreon Corporation, et al.*, Civil Action No. C07-800 MJP (the "Action"), in the United States District Court for the Western District of Washington, you must complete and, on page 5, sign this Proof of Claim and Release form ("Proof of Claim"). If you fail to submit a timely, properly completed and addressed Proof of Claim, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund. All defined terms contained herein shall have the same meanings as set forth in the Stipulation of Settlement dated as of October 25, 2010.

**Please submit supporting documentation for your claim.**

You must submit documentation for your trading history. Acceptable documentation may include: (a) monthly stock brokerage or other investment account statements; (b) trade confirmation slips; (c) a signed letter from your broker on firm letterhead verifying the information you are providing; (d) a Deposit or Escrow Receipt showing your holdings; or (e) other equivalent proof of your transactions. **DO NOT SEND ORIGINALS.** If you have questions, please call 1-888-226-8151.

Official  
Office  
Use  
Only

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

*McGuire, et al. v. Dendreon Corporation, et al.*

Civil Action No. C07-800 MJP

**PROOF OF CLAIM AND RELEASE**

**Please Type or Print in the Boxes Below**  
**Do NOT use Red Ink, Pencil, or Staples**

**Must be Postmarked  
on or before  
March 10, 2011**

**DENDREON**

**CLAIMANT IDENTIFICATION**

Last Name	M.I.	First Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Last Name (Co-Beneficial Owner)	M.I.	First Name (Co-Beneficial Owner)
<input type="text"/>	<input type="text"/>	<input type="text"/>

IRA     
  Joint Tenancy     
  Employee     
  Individual     
  Other \_\_\_\_\_ (specify)

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA

Trustee/Asset Manager/Nominee/Record Owner's Name (if Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Social Security Number	or	Taxpayer Identification Number
<input type="text"/> - <input type="text"/> - <input type="text"/>		<input type="text"/> - <input type="text"/>

Telephone Number (Work)	Telephone Number (Home)
<input type="text"/> - <input type="text"/> - <input type="text"/>	<input type="text"/> - <input type="text"/> - <input type="text"/>

Email Address

**MAILING INFORMATION**

Address

Address

City	State	Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/> - <input type="text"/>

Foreign Province	Foreign Postal Code	Foreign Country Name/Abbreviation
<input type="text"/>	<input type="text"/>	<input type="text"/>

FOR CLAIMS PROCESSING ONLY	PB <input type="text"/>	PC <input type="text"/>	<input type="radio"/> ND	<input type="radio"/> NS	<input type="radio"/> ICI	<input type="radio"/> OPT	M M / D D / Y Y Y Y	FOR CLAIMS PROCESSING ONLY
			<input type="radio"/> IHI	<input type="radio"/> NTIN	<input type="radio"/> OTHER	<input type="radio"/> MRG		<input type="radio"/> BOTH



A. **BEGINNING HOLDINGS** Number of shares of Dendreon Corporation common stock owned at the close of trading on **March 28, 2007**: (If none, write "0"; if other than zero, must be documented.) Proof Enclosed?  Y  N

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B. List each individual purchase of Dendreon Corporation common stock from **March 29, 2007 through May 8, 2007**, inclusive, as follows: (a) the trade date (list chronologically); (b) the number of shares traded; (c) price per share; and (d) the total transaction amount. If you require additional space, attach extra sheets in the same format as below.

**PURCHASES**

	Trade Date(s) of Shares (List Chronologically)	Number of Shares Purchased	Total Purchase Price (Excluding Commissions, Taxes and Fees) <i>Please round off to the nearest whole dollar</i>	Proof of Purchase Enclosed?
	M M / D D / Y Y Y Y		\$	
1.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
2.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
3.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
4.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N

IMPORTANT: (i) Identify by number listed above all purchases in which you covered a "short sale":

C. List each individual sale of Dendreon Corporation common stock from **March 29, 2007 through May 8, 2007**, inclusive, as follows: (a) the trade date (list chronologically); (b) the number of shares traded; (c) price per share; and (d) the total transaction amount. If you require additional space, attach extra sheets in the same format as below.

**SALES**

	Trade Date(s) of Shares (List Chronologically)	Number of Shares Sold	Total Sales Price (Exclusive of Commissions, Taxes and Fees) <i>Please round off to the nearest whole dollar</i>	Proof of Sales Enclosed?
	M M / D D / Y Y Y Y		\$	
1.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
2.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
3.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N
4.	<input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="radio"/> Y <input type="radio"/> N

D. **UNSOLD HOLDINGS** Number of shares of Dendreon Corporation common stock owned at the close of trading on **May 8, 2007**: (If none, write "0"; if other than zero, must be documented.) Proof Enclosed?  Y  N

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*If you require additional space, attach extra schedules in the same format as above. Sign and print your name on each additional page.*  
**YOU MUST READ AND SIGN THE RELEASE ON PAGE 5. FAILURE TO SIGN THE RELEASE  
MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.**



1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally and forever release, relinquish and discharge, all of the Released Claims against Dendreon Corporation (“Dendreon”), Mitchell Gold, and David Urdal (collectively, “Defendants”) and each and all of their “Related Parties,” defined as each of a Defendant’s past or present directors, officers, employees, partners, insurers, co-insurers, reinsurers, agents, controlling shareholders, attorneys, accountants, auditors, advisors, investment advisors, personal or legal representatives, predecessors, successors, assigns, parents, subsidiaries, divisions, joint ventures, spouses, marital communities, heirs, related or affiliated persons or entities, any entity in which a Defendant has a controlling interest, any members of a Defendant’s immediate family, or any trust of which a Defendant is the settlor or which is for the benefit of a Defendant’s family.
2. “Released Claims” means all claims (including “Unknown Claims,” as defined below) and causes of action of every nature and description, whether known or unknown, whether arising under federal, state, or common law, whether brought directly or derivatively, that the Class Representatives or any Class Member asserted in the Third Amended Complaint, or could have asserted against any of Defendants or their Related Parties, by virtue of purchases made or ownership of Dendreon common stock during the Class Period, based upon or arising out of any facts, allegations, or claims set forth in the Third Amended Complaint.
3. “Unknown Claims” means all claims, demands, rights, liabilities, and causes of action of every nature and description which the Class Representatives or any Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Persons, and any Released Persons’ Claims that Defendants or any other Released Person does not know or suspect to exist in his, her, or its favor at the time of the release of the Class Representatives, Class Members, or their respective attorneys, including Class Counsel, which, if known by him, her, or it, might have affected his, her, or its settlement with and/or release of the Released Persons, or might have affected his, her or its decision not to object to this Settlement. With respect to any and all Released Claims and Released Persons’ Claims, the Settling Parties stipulate and agree that, upon the Effective Date, the Class Representatives and each of the Released Persons shall expressly waive, and each of the Class Members shall be deemed to have waived, and by operation of the Judgment shall have waived, the provisions, rights and benefits of California Civil 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.**

The Class Representatives and each of the Released Persons shall expressly waive and each of the Class Members shall be deemed to have waived, and by operation of the Judgment shall have expressly waived, any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to California Civil Code § 1542. The Class Representatives and Class Members may hereafter discover facts in addition to or different from those which he, she, or it now knows or believes to be true with respect to the subject matter of the Released Claims, and Defendants and other Released Persons may hereafter discover facts in addition to or different from those which he, she, or it now knows or believes to be true with respect to the subject matter of the Released Persons’ Claims, but the Class Representatives and each of the Released Persons shall expressly fully, finally, and forever settle and release, and each Class Member, upon the Effective Date, shall be deemed to have, and by operation of the Judgment shall have, fully, finally, and forever settled and released, any and all Released Claims and Released Persons’ Claims, as applicable, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts. The Class Representatives and each of the Released Persons acknowledge, and the Class Members shall be deemed by operation of the Judgment to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement of which this release is a part.

4. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.
5. I (We) hereby warrant and represent to the best of my (our) knowledge that I (we) have included information about all of my (our) transactions in Dendreon common stock that occurred during the Class Period as well as the number of shares of Dendreon common stock held by me (us) at the close of trading on March 28, 2007 and May 8, 2007.



CERTIFICATION

Under the penalty of perjury, I (we) certify that:

- 1. The number shown below on this form is my current SSN/TIN; and
- 2. I (We) certify that I am (we are) not subjected to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code.

NOTE: If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the language that you are not subject to backup withholding in the certification above.

The Internal Revenue Service does not require your consent to any provision other than the certification required to avoid backup withholding.

Social Security Number

□□□□ — □□ — □□□□□□

Taxpayer Identification Number

□□ — □□□□□□□□□□

I (We) declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_ (month), 20\_\_\_\_ (year)  
in \_\_\_\_\_ (city), \_\_\_\_\_ (state/country).

\_\_\_\_\_  
(Signature of Claimant)

\_\_\_\_\_  
(Type or print name of Claimant)

\_\_\_\_\_  
(Signature of Joint Claimant, if any)

\_\_\_\_\_  
(Type or print name of Joint Claimant, if any)

\_\_\_\_\_  
(Signature of person signing on behalf of Claimant)

\_\_\_\_\_  
(Type or print name of person signing on behalf of Claimant)

\_\_\_\_\_  
Capacity of person signing on behalf of Claimant, if other than an individual  
(e.g., Administrator, Executor, Trustee, President, Custodian, Power of Attorney, etc.)

**Please submit your Proof of Claim and the required documentation  
POSTMARKED NO LATER THAN MARCH 10, 2011 TO:**

**McGuire, et al. v. Dendreon Corporation, et al., Class Action  
PROOF OF CLAIM  
c/o Gilardi & Co., LLC  
Claims Administrator  
P.O. Box 5100  
Larkspur, California 94977-5100**

