

IF YOU PURCHASED OR ACQUIRED, FOR VALUE, SECURITIES OF ORSU METALS CORPORATION, FORMERLY KNOWN AS EUROPEAN MINERALS CORPORATION (“EPM”), DURING THE PERIOD FROM AND INCLUDING MAY 16, 2007 TO AND INCLUDING APRIL 11, 2008 (“CLASS PERIOD”)(“CLASS MEMBERS”), YOU ARE A “CLASS MEMBER” AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT PROCEEDS.

IF YOU ARE A CLASS MEMBER, YOU MUST COMPLETE AND SUBMIT THIS FORM IN ORDER TO BE ELIGIBLE FOR ANY SETTLEMENT BENEFITS.

YOU MUST COMPLETE AND SIGN THIS PROOF OF CLAIM AND RELEASE (“PROOF OF CLAIM”) AND MAIL IT BY FIRST CLASS MAIL, POSTMARKED NO LATER THAN JULY 5, 2010 TO ONE OF THE FOLLOWING ADDRESSES AT YOUR CONVENIENCE:

Orsu Metals Litigation Settlement
c/o Bowne
220 Bay Street, Suite 200
Toronto, ON M5J 2W4
Canada

Orsu Metals Litigation Settlement
c/o BMC Group
One London Wall
London EC2Y 5AF
United Kingdom

YOUR FAILURE TO SUBMIT YOUR CLAIM BY JULY 5, 2010 WILL SUBJECT YOUR CLAIM TO REJECTION AND PRECLUDE YOUR RECEIVING ANY MONEY IN CONNECTION WITH THE SETTLEMENT OF THESE ACTIONS. DO NOT MAIL OR DELIVER YOUR CLAIM TO THE COURT OR TO ANY OF THE PARTIES OR THEIR COUNSEL AS ANY SUCH CLAIM WILL BE DEEMED NOT TO HAVE BEEN SUBMITTED. SUBMIT YOUR CLAIM ONLY TO THE CLAIMS ADMINISTRATOR.

CLAIMANT’S STATEMENT

1. I (we) purchased common stock in the company. (Do not submit this Proof of Claim if you did not purchase shares of the companies’ common stock during the Class Period).
2. By submitting this Proof of Claim, I (we) state that I (we) believe in good faith that I am (we are) a Class Member as defined above and in the Notice of Pendency and Proposed Settlement of Class Actions (the “Notice”), or am (are) acting for such person(s); that I am (we are) not a Defendant in the Actions or anyone excluded from the Class; that I (we) have read and understand the Notice; that I (we) believe that I am (we are) entitled to receive a share of the Net Settlement Amount; that I (we) elect to participate in the proposed Settlement described in the Notice; and that I (we) have not filed a request for exclusion. If you are acting in a representative capacity on behalf of a Class Member (e.g., as an executor, administrator, trustee, or other representative), you must submit evidence of your current authority to act on behalf of that Class Member. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.
3. I (we) consent to the jurisdiction of the Ontario Superior Court of Justice (“Court”) with respect to all questions concerning the validity of this Proof of Claim. I (we) understand and agree that my (our) claim may be subject to investigation, provided that such investigation shall be limited to my (our) status as a Class Member(s) and the validity and amount of my (our) claim.
4. I (we) have set forth where requested below all relevant information with respect to each purchase of EPM Securities during the Class Period, and each sale, if any, of such securities. I (we) agree to furnish additional information (including transactions in other securities) to the Claims Administrator to support this claim if requested to do so.



5. I (we) have enclosed photocopies of the stockbroker's confirmation slips, stockbroker's statements, or other documents evidencing each purchase, sale or retention of the listed company's common stock listed below in support of my claim. IF ANY SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN A COPY OR EQUIVALENT DOCUMENTS FROM YOUR BROKER BECAUSE THESE DOCUMENTS ARE NECESSARY TO PROVE AND PROCESS YOUR CLAIM.
6. I (we) understand that the information contained in this Proof of Claim is subject to such verification as the Claims Administrator may request or as the Court may direct, and I (we) agree to cooperate in any such verification. (The information requested herein is designed to provide the minimum amount of information necessary to process most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your recognized claim. In some cases, the Claims Administrator may condition acceptance of the claim based upon the production of additional information, including, where applicable, information concerning transactions in any derivatives of the subject securities such as options.)
7. Upon the occurrence of the Effective Date, I (we) agree and acknowledge that my (our) signature(s) hereto shall effect and constitute a full and complete release, remise and discharge by me (us) and my (our) heirs, executors, administrators, predecessors, successors, and assigns (or, if I am (we are) submitting this Proof of Claim on behalf of a corporation, a partnership, estate or one or more other persons, by it, him, her or them, and by its, his, her or their heirs, executors, administrators, predecessors, successors, and assigns) of each of the "Released Parties" of all "Settled Claims," as defined in the Settlement Agreement.
8. NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All Claimants MUST submit a manually signed paper Proof of Claim form listing all their transactions whether or not they also submit electronic copies. If you wish to file your claim electronically, you must contact the Claims Administrator at 1-866-233-5629 (USA/Canada) or 0-800-098-8723 (United Kingdom), or visit their website at www.orsusettlement.com to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.



SCHEDULE OF TSX TRANSACTIONS IN EPM COMMON STOCK

Please indicate the currency utilized in the transactions below:

Canadian Dollars US Dollars Euros Pounds Sterling Other _____

Beginning Holdings:

A. State the total number of shares of EPM common stock owned at the close of trading on May 15, 2007 (*must be documented*):

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Check Here if Documentation is Enclosed

Purchases:

B. Separately list each and every open market purchase of EPM common stock during the period May 16, 2007 through April 11, 2008, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Shares Purchased	Price	Total Cost	Check Here if Documentation is Enclosed
M	M	Y				
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>

Sales:

C. Separately list each and every sale of EPM common stock during the period May 16, 2007 through the present, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Shares Sold	Price	Total Cost	Check Here if Documentation is Enclosed
M	M	Y				
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>
						<input type="checkbox"/>

Ending Holdings:

D. State the total number of shares of EPM common stock still owned at present (*must be documented*):

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Check Here if Documentation is Enclosed

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security/Insurance or Taxpayer Identification number at the top of each sheet.



SCHEDULE OF AIM TRANSACTIONS IN EPM COMMON STOCK

Please indicate the currency utilized in the transactions below:

Canadian Dollars US Dollars Euros Pounds Sterling Other _____

Beginning Holdings:

A. State the total number of shares of EPM common stock owned at the close of trading on May 15, 2007 (*must be documented*):

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Check Here if Documentation is Enclosed

Purchases:

B. Separately list each and every open market purchase of EPM common stock during the period May 16, 2007 through April 11, 2008, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Shares Purchased	Price	Total Cost	Check Here if Documentation is Enclosed
M	M	Y				

Sales:

C. Separately list each and every sale of EPM common stock during the period May 16, 2007 through the present, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Shares Sold	Price	Total Cost	Check Here if Documentation is Enclosed
M	M	Y				

Ending Holdings:

D. State the total number of shares of EPM common stock still owned at present (*must be documented*):

--	--	--	--	--	--	--	--

Check Here if Documentation is Enclosed

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security/Insurance or Taxpayer Identification number at the top of each sheet.



SCHEDULE OF TRANSACTIONS IN EPM CLASS A WARRANTS

Please indicate the currency utilized in the transactions below:

Canadian Dollars US Dollars Euros Pounds Sterling Other _____

Beginning Holdings:

A. State the total number of of EPM Class A Warrants owned at the close of trading on May 15, 2007 (*must be documented*):

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Check Here if Documentation is Enclosed

Purchases:

B. Separately list each and every acquisition of EPM Class A Warrants during the period May 16, 2007 through April 11, 2008, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Warrants Acquired	Price	Total Cost	Check Here if Documentation is Enclosed
M M	D D	Y Y				

Sales:

C. Separately list each and every disposal of EPM Class A Warrants during the period May 16, 2007 through the present, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Warrants Disposed	Price	Total Cost	Check Here if Documentation is Enclosed
M M	D D	Y Y				

Ending Holdings:

D. State the total number of EPM Class A Warrants still owned at present (*must be documented*):

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Check Here if Documentation is Enclosed

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security/Insurance or Taxpayer Identification number at the top of each sheet.



SCHEDULE OF TRANSACTIONS IN EPM CLASS B WARRANTS

Please indicate the currency utilized in the transactions below:

Canadian Dollars US Dollars Euros Pounds Sterling Other _____

Beginning Holdings:

A. State the total number of EPM Class B Warrants owned at the close of trading on May 15, 2007 (*must be documented*):

Check Here if Documentation is Enclosed

Purchases:

B. Separately list each and every acquisition of EPM Class B Warrants during the period May 16, 2007 through April 11, 2008, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Warrants Acquired	Price	Total Cost	Check Here if Documentation is Enclosed
M M	D D	Y Y				
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>

Sales:

C. Separately list each and every disposal of EPM Class B Warrants during the period May 16, 2007 through the present, inclusive, and provide the following information (*must be documented*):

Trade Date (List Chronologically)			Number of Warrants Disposed	Price	Total Cost	Check Here if Documentation is Enclosed
M M	D D	Y Y				
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>

Ending Holdings:

D. State the total number of EPM Class B Warrants still owned at present (*must be documented*):

Check Here if Documentation is Enclosed

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security/Insurance or Taxpayer Identification number at the top of each sheet.



UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION I (WE) PROVIDED ON THIS PROOF OF CLAIM AND RELEASE FORM IS TRUE, CORRECT AND COMPLETE.

Signature of Claimant (If this claim is being made on behalf of Joint Claimants, then each claimant must sign)

Two empty rectangular boxes for signatures.

Date

Date entry boxes: M M / D D / Y Y Y Y

(Capacity of person(s) signing, e.g. beneficial purchaser(s), executor, administrator, trustee, etc.)

A long horizontal row of empty boxes for capacity information.

Check Here if proof of authority to file is enclosed (See Item on Page 2 for instructions)

THIS PROOF OF CLAIM MUST BE SUBMITTED NO LATER THAN JULY 5, 2010, AND MUST BE MAILED TO:

**Orsu Metals Litigation Settlement
c/o Bowne
220 Bay Street, Suite 200
Toronto, ON M5J 2W4
Canada**

**Orsu Metals Litigation Settlement
c/o BMC Group
One London Wall
London EC2Y 5AF
United Kingdom**

A Proof of Claim received by the Claims Administrator shall be deemed to have been submitted when posted, if mailed by July 5, 2010 and if a postmark is indicated on the envelope and it is mailed first class, and addressed in accordance with the above instructions. In all other cases, a Proof of Claim shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to process fully all of the Proofs of Claim and to administer the Settlement. This work will be completed as promptly as time permits, given the need to investigate and tabulate each Proof of Claim. Please notify the Claims Administrator of any change of address.

REMINDER CHECKLIST

- 1. Please be sure to sign this Proof of Claim on page 8. If this Proof of Claim is submitted on behalf of joint claimants, then both claimants must sign.
- 2. Please remember to attach supporting documents. Do NOT send any stock certificates. Keep copies of everything you submit.
- 3. Do NOT use highlighter on the Proof of Claim or any supporting documents.
- 4. If you move after submitting this Proof of Claim, please notify the Claims Administrator of the change in your address.

NOTE: RECEIPT ACKNOWLEDGMENT NEEDED

The Claims Administrator will send a written confirmation of its receipt of your Proof of Claim. Do not assume your claim is submitted until you receive written confirmation of its receipt. Your claim is not deemed fully filed until the Claims Administrator sends you written confirmation of its receipt of your Proof of Claim. If you do not receive an acknowledgement postcard within thirty (30) days of your mailing the Proof of Claim, then please call the Claims Administrator toll free at 1-866-233-5629 (USA/Canada) or 0-800-098-8723 (United Kingdom).

Additional information is available at www.orsusettlement.com and www.classaction.ca.

