

# Exhibit 2

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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: 13 Civ. 3851 (RMB)  
**IN RE BARRICK GOLD SECURITIES** :  
**LITIGATION** : **CLASS ACTION**  
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**DECLARATION OF RENÉ THIEL OF LEAD PLAINTIFF LRI INVEST S.A. IN  
SUPPORT OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
SETTLEMENT AND PLAN OF ALLOCATION AND LEAD COUNSEL'S MOTION  
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**



I, René Thiel, declare as follows:

1. I am Head of Legal & Compliance at LRI Invest S.A. (“LRI”), one of the Court-appointed Lead Plaintiffs in the above-captioned securities class action (the “Action”).<sup>1</sup> LRI is based in Munsbach, Luxembourg, and is an independent, investment administration company. It is a sophisticated institutional investor and experienced fiduciary. LRI provides administrative services for around 200 funds with assets under management totaling around € 8 billion.

2. I respectfully submit this Declaration in support of: (a) Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation; and (b) Lead Counsel’s Motion for Attorneys’ Fees and Reimbursement of Litigation Expenses. I have personal knowledge of the matters related to LRI’s application and of the other matters set forth in this Declaration, as I, or others working with me or under my direction, have been directly involved in monitoring and overseeing the prosecution of the Action on LRI’s behalf, and I could and would testify competently thereto.

**WORK PERFORMED BY LRI STAFF  
ON BEHALF OF THE SETTLEMENT CLASS**

3. LRI understands that the PSLRA was intended to encourage institutional investors with large losses to seek to manage and direct securities fraud class actions. LRI is a large, sophisticated institutional investor that committed itself to vigorously prosecuting this litigation, through trial if necessary. My experience as Head of Legal & Compliance of LRI includes prosecuting securities fraud class actions where LRI has served as a lead plaintiff or class representative. As a Lead Plaintiff in this Action, LRI understood its fiduciary duties to serve the interests of the Class by participating in the management and prosecution of the Action.

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<sup>1</sup> All capitalized terms used herein, unless otherwise defined, have the same meanings as set forth in the Amended Stipulation of Settlement dated June 9, 2016 (the “Stipulation”), filed with the Court on June 9, 2016. *See* ECF No. 167-1.



4. LRI has fulfilled its responsibilities as a Lead Plaintiff. As a Lead Plaintiff in the Action, LRI has, *inter alia*: (a) conferred with Motley Rice LLC (“Motley Rice”), the Court-appointed Lead Counsel in the Action, on the overall strategy for prosecuting the Action, including moving for Lead Plaintiff; (b) reviewed court filings; (c) evaluated regular status reports from Motley Rice; (d) searched for and compiled relevant documents and information in response to discovery requests; (e) prepared for and attended a deposition under Rule 30(b)(6) of the Federal Rules of Civil Procedure; (f) analyzed and responded to Defendants’ settlement proposals; and (g) communicated with Motley Rice regarding settlement negotiations and documentation.<sup>2</sup>

**LRI STRONGLY ENDORSES  
THE COURT’S APPROVAL OF THE SETTLEMENT**

5. Based on its involvement throughout the prosecution and resolution of the Action, LRI believes that the proposed Settlement is fair, reasonable, and adequate to the Class. Because LRI believes that the proposed Settlement represents a substantial recovery for the Class, particularly in light of the substantial risks of continuing to litigate the Action, it strongly endorses approval of the Settlement by the Court.

**LRI SUPPORTS LEAD COUNSEL’S MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND PAYMENT OF LITIGATION EXPENSES**

6. LRI also believes that Lead Counsel’s request for an award of attorneys’ fees in the amount of 25% of the Settlement Fund (which includes any accrued interest) is fair and reasonable. LRI has evaluated the fee request in light of the work performed by counsel, the risks and challenges in the litigation, and the substantial recovery obtained for the Class.

7. LRI understands that Lead Plaintiffs’ Counsel also will devote additional time in the future to administering the Settlement and distributing the Net Settlement Fund. LRI further

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<sup>2</sup> LRI is also counseled in this Action by its attorney, Deborah M. Sturman of Sturman LLC.

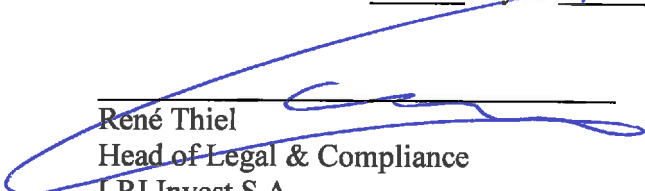
believes that Lead Counsel's request for reimbursement of litigation expenses is reasonable given that the costs and expenses in question were necessary for the successful prosecution and resolution of this case. Based on the foregoing, and consistent with its obligation to obtain the best result at the most efficient cost on behalf of the Class, LRI fully supports Lead Counsel's motion for attorneys' fees and payment of litigation expenses.

**CONCLUSION**

8. In conclusion, LRI fully endorses the Settlement as fair, reasonable and adequate, and believes it represents a significant recovery for the Class. LRI further supports Lead Counsel's attorneys' fee and litigation expense request and believes that it represents fair and reasonable compensation in light of the work performed, the substantial recovery obtained for the Class, and the attendant litigation risks. Accordingly, LRI respectfully requests that the Court approve the Lead Plaintiffs' motion for final approval of the proposed Settlement and Lead Counsel's motion for an award of attorneys' fees and payment of litigation expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I have the authority to execute this Declaration on behalf of LRI.

Executed this 31<sup>st</sup> day of August, 2016, at Munsbach, Luxembourg.

  
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René Thiel  
Head of Legal & Compliance  
LRI Invest S.A.