

through September 3, 2023:

Timekeeper¹	Hourly Rate	Hours through September 3, 2023	Lodestar
Ned Weinberger (P)	\$925	1,102.7	\$1,019,997.50
Mark Richardson (P)	\$875	20.1	\$17,587.50
Brendan Sullivan (P)	\$825	1313.9	\$1,083,967.50
Michael Wagner (P)	\$900	400.7	\$360,630.00
Eric Belfi (P)	\$1,075	42.8	\$46,010.00
Jonathan Gardner (P)	\$1,275	3.4	\$4,335.00
Corban Rhodes (P)	\$900	41.3	\$37,170.00
Christopher Keller (P)	\$1,325	11.5	\$15,237.50
John Vielandi (C)	\$675	452.3	\$305,302.50
David MacIsaac (C)	\$625	892.5	\$557,812.50
Derrick Farrell (C)	\$750	1256.9	\$942,675.00
Jiahui (Rose) Wang (A)	\$500	2191.0	\$1,095,500.00
Casimir Szustak (A)	\$500	931.2	\$465,600.00
William Passannante (A)	\$500	76.4	\$38,200.00
Veronica Bosco (A)	\$525	9.5	\$4,987.50
Joel Shelton (SA)	\$475	3271.3	\$1,553,867.50
Karine Law (SA)	\$400	1859.5	\$743,800.00
Timothy Barrett (SA)	\$425	5.1	\$2,167.50
Christina Jason (SA)	\$375	1539.6	\$577,350.00
Mara Taylor (SA)	\$450	4.6	\$2,070.00
Rachel Graf (I)	\$475	11.5	\$5,462.50
Connor Rutherford (I)	\$450	3.4	\$1,530.00
Alexandra Carpio (PA)	\$375	317.0	\$118,875.00
Carla Eaton (PA)	\$235	58.9	\$13,841.50
Cheryl Boria (PA)	\$390	7.0	\$2,730.00
Sandy Manzolillo (PA)	\$390	5.0	\$1,950.00
Euterpe Pina (PA)	\$375	3.4	\$1,275.00
Francisco Malonzo (PA)	\$380	10.6	\$4,028.00

¹ P = Partner; C = Of Counsel; A = Associate; SA = Staff Attorney; I = Investigator; PA = Paralegal; LC = Law Clerk; SU = Summer Associate.

Timekeeper¹	Hourly Rate	Hours through September 3, 2023	Lodestar
Nathan Donlon (PA)	\$390	18.4	\$7,176.00
Domenic Scalora (PA)	\$365	125.5	\$45,807.50
Tyler Blackington (LC)	\$300	311.4	\$93,420.00
Tianyi Lu (LC)	\$300	210.6	\$63,180.00
Ryan Stieve (SU)	\$275	127.3	\$35,007.50
TOTAL	n/a	16,636.3	\$9,268,550.50

5. From September 4, 2023, *i.e.*, the day after the parties executed the Binding Term Sheet, through December 6, 2023, *i.e.*, when the parties executed the Stipulation and Agreement of Settlement, Compromise, and Release, attorneys, paralegals, and support staff at Labaton expended a total combined 125.5 hours to the prosecution of the Action for a total lodestar of \$76,995.00 based on Labaton's current hourly rates.

6. The chart below reflects Labaton's time, hourly rates, and lodestar from September 4, 2023 through December 6, 2023:

Timekeeper²	Hourly Rate	Hours from September 4, 2023 through December 6, 2023	Lodestar
Ned Weinberger (P)	\$925	15.3	\$14,152.50
Brendan Sullivan (P)	\$825	30.0	\$24,750.00

² P = Partner; C = Of Counsel; A = Associate; P = Paralegal.

Timekeeper²	Hourly Rate	Hours from September 4, 2023 through December 6, 2023	Lodestar
Jiahui (Rose) Wang (A)	\$500	60.2	\$30,100.00
Casimir Szustak (A)	\$500	4.5	\$2,250.00
Alexandra Carpio (PA)	\$375	8.5	\$3,187.50
Domenic Scalora (PA)	\$365	7.0	\$2,555.00
TOTAL	n/a	125.5	\$76,995.00

7. The work performed by Labaton attorneys and paralegals included, among other things: (i) investigating the claims underlying the Action; (ii) preparing and filing two complaints (one initial and one amended); (iii) briefing and arguing motions to dismiss; (iv) undertaking substantial defendant and third-party discovery; (v) responding to discovery taken on Plaintiff; (vi) engaging in significant expert work and discovery; and (vii) preparing for and engaging in three mediations, including the preparation of mediation statements.

8. Labaton has also incurred \$545,013.26 in litigation expenses to date, all of which were necessary to the prosecution of the Action. These expenses break down as follows:

Expense Category	Amount
Court/Filing Fees	\$22,886.90
Mailing/Hand Delivery/Service of Process	\$2,938.54
Printing/Duplication	\$26,886.24
Court Reporter/Transcripts	\$69,380.60

Expense Category	Amount
Legal & Investigative Research	\$20,394.34
Overtime Meals & Transportation	\$12,727.83
E-Discovery Costs & Support	\$3,169.48
Expert Fees	\$335,379.33
Mediation Fees	\$51,250.00
TOTAL	\$545,013.26

9. Labaton’s expenses pertaining to this case are reflected in the books and records of the firm. These books and records are prepared from invoices, bills, expense vouchers and check records kept in the normal course of business.

10. Based upon the information provided to me by the other counsel for Ms. Britt, Co-Lead Counsel Robbins Geller Rudman & Dowd LLP (“RGRD”) and additional counsel, The Shall Law Firm, attorneys, paralegals, and other support staff at those firms recorded 21,859.15 hours, for a total lodestar of \$13,619,772.00 from the inception of the matter through December 6, 2023. Those firms also collectively incurred direct expenses of \$577,122.39 in connection with the prosecution of this Action.

11. I respectfully request that the Court award the attorneys’ fees and expense reimbursement requested.

12. Attached hereto as exhibits are true and correct copies of the following documents:

EXHIBIT NO.	DESCRIPTION
1	Chart of Depositions taken in both Federal and Court of Chancery Actions
2	Expert Report of J.T. Atkins dated June 30, 2023 [CONFIDENTIAL]
3	Expert Report of Frederick G. Van Zijl dated June 30, 2023 [CONFIDENTIAL]
4	Expert Report of Daniel R. Fischel dated June 30, 2023 [CONFIDENTIAL]
5	Expert Report of Micah S. Officer dated February 24, 2023 [CONFIDENTIAL]
6	Expert Report of Paul A. Gompers dated March 24, 2023 [CONFIDENTIAL]
7	Expert Report of Frederick G. Van Zijl dated March 24, 2023 [CONFIDENTIAL]

I declare under penalty of perjury and under the laws of the State of Delaware that the foregoing is true and correct.

Dated: April 3, 2024



Ned Weinberger (Bar No. 5256)
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nweinberger@labaton.com

Subscribed and sworn to (or affirmed) before me this 3rd day of April 2024.


NOTARY PUBLIC



ALEXANDRA CARPIO
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires Dec. 13, 2024

CERTIFICATE OF SERVICE

I, Ned Weinberger, hereby certify that, on April 3, 2024, I caused a true and correct copy of the foregoing to be served on the following by File and ServeXpress:

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/s/ Ned Weinberger

Ned Weinberger (Bar No. 5256)