



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

AHUVA SCHACHTER, MICHAEL
SMITH, DOUGLAS NEUJAHR,
SAMHITA GERA, and DENISH
BHAVSAR, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

vs.

IAN ROBERTSON, KEN MANGET,
CHRISTOPHER JARRATT,
MICHAEL HOFFMAN, PAUL
DALGLISH, BRAD SPARKES, and
ROBERT SCHAEFER,

Defendants.

C.A. No. 2023-1112-NAC

**PLAINTIFFS' MOTION TO CERTIFY THE CLASS, APPROVE THE
PROPOSED SETTLEMENT, AWARD ATTORNEYS' FEES AND
EXPENSES, AND APPROVE SERVICE AWARDS**

Plaintiffs Ahuva Schachter, Michael Smith, Douglas Neujahr, Samhita Gera, and Denish Bhavsar ("Plaintiffs"), hereby move the Court for entry of an order and final judgment granting: (i) certification of the class for settlement purposes, pursuant to Court of Chancery Rules 23(a) and 23(b)(1); (ii) approval of the proposed settlement between: (a) Plaintiffs; and (b) Defendants Ian Robertson, Ken Manget, Christopher Jarratt, Michael Hoffman, Paul Dalglish, Brad Sparkes, and Robert Schaefer, as set forth in the Stipulation and Agreement of Compromise,

Settlement, and Release dated August 26, 2026; (iii) an award of attorneys' fees and expenses; and (iv) service awards for each of the Plaintiffs.

ROBBINS GELLER RUDMAN
& DOWD LLP

/s/ Jason M. Avellino

Of Counsel:

Christopher H. Lyons (#5493)
Jason M. Avellino (#5821)
1521 Concord Pike, Suite 301
Wilmington, DE 19803
(302) 467-2660

ROBBINS GELLER RUDMAN
& DOWD LLP
Randall J. Baron (*pro hac vice*)
Erik W. Luedeke
655 West Broadway, Suite 1900
San Diego, CA 92101
(619) 231-1058

GRANT & EISENHOFER P.A.
Christine M. Mackintosh (#5085)
Kelly L. Tucker (#6382)
123 Justison Street, 7th Floor
Wilmington, DE 19801
(302) 622-7000

Attorneys for Plaintiffs

ROBBINS LLP
Brian J. Robbins
Gregory E. Del Gaizo
Mario D. Valdovinos
5060 Shoreham Place, Suite 300
San Diego, CA 92122
(619) 525-3990

Words: 104/3,000

Michael Klausner
559 Nathan Abbott Way
Stanford, CA 94305
(650) 740-1194

BRONSTEIN, GEWIRTZ
& GROSSMAN, LLC
Peretz Bronstein
Eitan Kimelman
60 East 42nd Street, 46th Floor
New York, NY 10165
(212) 697-6484

ABRAHAM, FRUCHTER
& TWERSKY, LLP
Jack G. Fruchter
450 Seventh Avenue, 38th Floor
New York, NY 10123
(212) 279-5050

Dated: October 14, 2026