



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,

v.

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

Defendants.

C.A. No. 2023-1112 MTZ

**AFFIDAVIT OF GREGORY E. DEL GAIZO IN SUPPORT OF
PLAINTIFFS' OPENING BRIEF IN SUPPORT OF THEIR MOTION TO
CERTIFY THE CLASS, APPROVE THE PROPOSED SETTLEMENT,
AWARD ATTORNEYS' FEES AND EXPENSES, AND APPROVE
SERVICE AWARDS**

STATE OF CALIFORNIA)
) ss:
COUNTY OF SAN DIEGO)

I, Gregory E. Del Gaizo, being duly sworn, depose and say:

1. I am a partner at the firm of Robbins LLP ("Robbins" or the "Firm")
and a member in good standing of the State Bar of California. Robbins serves as
counsel for Plaintiffs in the above-captioned action (the "Action").

2. I respectfully submit this Affidavit in support of the proposed settlement (“Settlement”) and an award of attorneys’ fees and expenses incurred in connection with services rendered in the Action.

3. Robbins undertook this Action on an entirely contingent basis.

4. The information in this Affidavit regarding Robbins’ time and expenses is taken from time and expense records maintained by the Firm in the ordinary course of business. I reviewed my firm’s time and expense entries in connection with the preparation of this Affidavit. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the Action. Based on this review, I believe that the time reflected in the Firm’s lodestar calculation and the costs and expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the Action. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

5. The number of hours spent on the Action by the Firm from inception through April 28, 2026 (the date the parties reached an agreement in principle to settle the Action), is 367.75 for a total lodestar of \$209,905.00. A breakdown of the Firm’s hours from inception through April 28, 2026, is as follows:

TIMEKEEPER	TOTAL HOURS FROM INCEPTION THROUGH 4/28/26	RATE	TOTAL LODESTAR FROM INCEPTION THROUGH 4/28/26
Partners			
Gregory E. Del Gaizo	120.75	\$1,050	\$126,787.50
Associates			
Mario D. Valdovinos	33.00	\$525	\$17,325.00
Michelle H. Nguyen	31.00	\$485	\$15,035.00
Maria L. Mansur	12.75	\$485	\$6,183.75
Paralegal			
Anna-Marie Miller	59.00	\$375	\$22,125.00
Corporate Research			
Corporate Research ¹	111.25	\$202	\$22,448.75
TOTAL	367.75		\$209,905.00

6. The total number of hours spent on the Action by the Firm from April 29, 2026 through August 26, 2026 (the date the Stipulation and Agreement of Compromise, Settlement, and Release was signed), is 31.25 for a total lodestar of \$21,380.00. A breakdown of the Firm's hours from April 29, 2026 through August 26, 2026, is as follows:

TIMEKEEPER	TOTAL HOURS FROM 4/29/26 THROUGH 8/26/26	RATE	TOTAL LODESTAR FROM 4/29/26 THROUGH 8/26/26
Partners			
Gregory E. Del Gaizo	11.25	\$1,050	\$11,812.50

¹ Robbins' Corporate Research department consists of a group of trained professionals dedicated to investigating corporate malfeasance. The Corporate Research team conducted factual research and investigation, including, among other things, researching and identifying facts that formed the basis of the allegations. Corporate Research's rate is a blended hourly rate.

Associates			
Mario D. Valdovinos	0.75	\$525	\$393.75
Grant M. Klasna	18.00	\$485	\$8,730.00
Paralegal			
Anna-Marie Miller	1.00	\$375	\$375.00
Corporate Research			
Corporate Research ²	0.25	\$275	\$68.75
TOTAL	31.25		\$21,380.00

7. The work performed by the Firm included: (i) investigating the claims underlying this Action; (ii) researching and preparing the Complaint; (iii) researching and briefing oppositions to Defendants' motions to dismiss; (iv) conducting fact discovery, including preparing document requests; negotiating for the production of documents; and reviewing and analyzing documents produced by defendants; (v) retaining and working with Canadian bankruptcy counsel to prevent the release of the claims asserted in this Action; and (vi) negotiating and documenting the settlement.

8. The Firm also has incurred \$11,828.40 in expenses and charges in connection with the prosecution of the Action from the inception to date. These expenses and charges are summarized by category below:

DISBURSEMENTS	
Travel & Meals	\$ 901.23
Photocopies	\$ 96.85

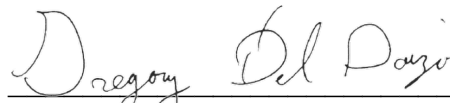
² Robbins' Corporate Research department consists of a group of trained professionals dedicated to investigating corporate malfeasance. The Corporate Research team conducted factual research and investigation, including, among other things, researching and identifying facts that formed the basis of the allegations. Corporate Research's rate is a blended hourly rate.

Research & Investigation	\$ 3,080.53
Filing/Service Fees	\$ 100.00
Bankruptcy Counsel	\$ 7,649.79
Total Disbursements:	\$ 11,828.40

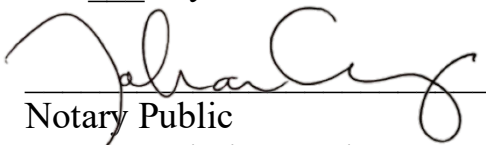
9. The \$11,828.40 in expenses incurred and paid by Robbins pertaining to this Action are reflected in the books and records of the Firm. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

10. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested for the reasons set forth in Plaintiffs' Opening Brief in Support of Their Motion to Certify the Class, Approve the Proposed Settlement, Award of Attorneys' Fees and Expenses, and Approve Service Awards and supporting documents.

Dated: October 12, 2026


 Gregory E. Del Gaizo
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 gdelgaizo@robbinsllp.com

Sworn to and subscribed to (or affirmed) before me
 this 12th day of October, 2026


 Notary Public
 My Commission Expires:

