



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 CHRISTINE M. MACKINTOSH 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 DELAWARE)
) ss:
COUNTY OF NEW CASTLE)

I, Christine M. Mackintosh, being duly sworn, depose and say:

1. I am a director of Grant & Eisenhofer, P.A. ("G&E" or the "Firm"), and a member in good standing of the Delaware Bar. G&E 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. G&E undertook this Action on an entirely contingent basis.

4. The information in this affidavit regarding G&E’s 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 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 516.60, for a total lodestar of \$626,327.50. 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
DIRECTORS			
Christine Mackintosh	126.10	\$2,000.00	\$252,200.00
Michael J. Barry	14.80	\$2,000.00	\$29,600.00
Gordon Novod	17.90	\$1,500.00	\$26,850.00
Kelly Tucker	4.30	\$1,300.00	\$5,590.00
Rebecca Musarra	0.30	\$1,300.00	\$390.00
OF COUNSEL			
David Wissbroecker	275.50	\$1000	\$275,500.00
ASSOCIATES			
Jason Avellino	1.50	\$725.00	\$1,087.50
Casimir Szustak	3.00	\$650.00	\$1,950.00
Jonathan Millis	15.80	\$650.00	\$10,270.00
Michalis Polygiannis	0.20	\$425.00	\$85.00
PARALEGAL			
Rachel Simon	4.00	\$400.00	\$1,600.00
Simone Braxton	49.40	\$400.00	\$19,760.00
Valisity Beal	0.50	\$400.00	\$200.00
Zachary Pfannes	0.30	\$400.00	\$120.00
Emma Spencer	3.00	\$375.00	\$1,125.00
TOTAL	516.60		\$626,327.50

6. The total number of hours spent on the Action by the Firm from April 29, 2026 through August 26, 2026 (the day the stipulation was signed) is 35.50 for a total lodestar of \$30,315.00. A breakdown of the Firm's hours from for 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
DIRECTORS			
Christine Mackintosh	5.00	\$2,000.00	\$10,000.00
Rebecca Musarra	0.5	\$1300.00	\$650.00
OF COUNSEL			
David Wissbroecker	1.50	\$1000.00	\$1,500.00
ASSOCIATE			
Edward Lilly	24. 60	\$675	\$16,605.00
PARALEGAL			
Simone Braxton	3.90	\$400	\$1,560.00
TOTAL	35.50		\$30,315.00

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.

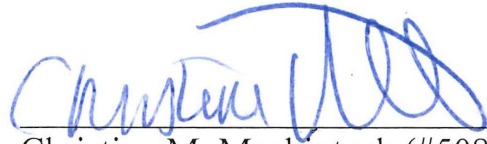
8. The Firm also has incurred \$39,596.51 in expenses and charges in connection with the prosecution of the Action from the inception to date. These expenses and charges are summarized by category below:

G&E DISBURSEMENTS	
Case Investigation	\$24.15
Case-Related Research	\$2,072.88
Duplication Services	\$797.98
Bankruptcy Counsel	\$32,361.50
Filing Fee	\$2,810.02
Postage & Delivery	\$520.88
Service Fees	\$644.70
Transcription Services	\$309.50
Travel	\$54.90
TOTAL	\$39,596.51

9. The \$39,596.51 in expenses incurred and paid by G&E 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 Attorneys' Fees and Expenses, and Approve Service Awards and supporting documents.

Dated: October 14, 2026



Christine M. Mackintosh (#5085)

GRANT & EISENHOFER, P.A.

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Sworn to and subscribed to (or affirmed) before me
this 14th day of October 2026



Notary Public

My Commission Expires:

