



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE KENSINGTON-QUANTUMSCAPE
DE-SPAC LITIGATION

C.A. No. 2022-0721-JTL

AFFIDAVIT OF DAVID M. SBORZ

STATE OF DELAWARE)
) ss.
COUNTY OF NEW CASTLE)

David M. Sborz, being duly sworn, deposes and says:

1. I am a partner of Andrews & Springer LLC (“Andrews & Springer” or the “Firm”). Andrews & Springer served as counsel for plaintiff Sheadrick Richards in the above-captioned action (“Action”). I was actively involved in the prosecution of the Action, am familiar with its proceedings, and have personal knowledge of the matters set forth herein based upon my supervision of, and participation in, all material aspects of the Action.

2. I submit this Affidavit in support of my Firm’s application for an award of attorneys’ fees and expenses in connection with services rendered in the Action.

3. Plaintiff’s counsel, including Andrews & Springer, represented plaintiff in this Action on a fully contingent basis. All costs and expenses in this case were borne by either Robbins Geller Rudman & Dowd LLP, Robbins LLP, Andrews & Springer LLC, or Herman Jones LLP.

4. The information in this Affidavit regarding the Firm’s time and expenses is taken from time and expense reports and supporting documentation

prepared and maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the Action and I reviewed these reports 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 my 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.

5. Based on the daily time records maintained by my Firm, the number of hours spent on the Action by the Firm from inception through October 3, 2024 (the date the parties accepted the proposal to settle the Action) is 138.3 for a total lodestar of \$98,890.00. A breakdown of the Firm's hours from inception through October 3, 2024, is as follows:

NAME	HOURS	CURRENT HOURLY RATE	LODESTAR
Peter B. Andrews (P)	5.9	\$1,100.00	\$6,490.00
David M. Sborz (P)	57.5	\$925.00	\$53,187.50
Andrew J. Peach (OC)	12.8	\$875.00	\$11,200.00
Jackson E. Warren (A)	1.1	\$700.00	\$770.00
Jacob D. Jeifa (A)	2.3	\$525.00	\$1,207.50
Dara J. Cupingood (PL)	36.6	\$500.00	\$18,300.00
Jackson R. Brandwene (PL)	22.1	\$350.00	\$7,735.00
TOTAL	138.3		\$98,890.00

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PL) – Paralegal

6. Based on the daily time records maintained by my Firm, the number of hours spent on the Action by the Firm from October 4, 2024, through April 2, 2025—the date the Stipulation and Agreement of Compromise, Settlement, and Release was filed—is 7.3 for a total lodestar of \$6,202.50. A breakdown of the Firm’s hours from October 4, 2024, through April 2, 2025, is as follows:

NAME	HOURS	CURRENT HOURLY RATE	LODESTAR
David M. Sborz (P)	0.5	\$925.00	\$462.50
Andrew J. Peach (OC)	6.4	\$875.00	\$5,600.00
Jackson R. Brandwene (PL)	0.4	\$350.00	\$140.00
TOTAL	7.3		\$6,202.50

(P) – Partner; (OC) – Of Counsel; (PL) – Paralegal

7. Based on the daily time records maintained by my Firm, the number of hours spent on the Action by the Firm from inception through April 2, 2025 is 145.6 for a total lodestar of \$105,092.50. A breakdown of the Firm’s hours from inception through April 2, 2025, is as follows:

NAME	HOURS	CURRENT HOURLY RATE	LODESTAR
Peter B. Andrews (P)	5.9	\$1,100.00	\$6,490.00
David M. Sborz (P)	58.0	\$925.00	\$53,650.00
Andrew J. Peach (OC)	19.2	\$875.00	\$16,800.00
Jackson E. Warren (A)	1.1	\$700.00	\$770.00
Jacob D. Jeifa (A)	2.3	\$525.00	\$1,207.50
Dara J. Cupingood (PL)	36.6	\$500.00	\$18,300.00
Jackson R. Brandwene (PL)	22.5	\$350.00	\$7,875.00
TOTAL	145.6		\$105,092.50

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PL) – Paralegal

8. The Firm also has \$11,276.73 in expenses and charges in connection with the prosecution of the Action from inception to date. The expenses and charges are summarized by category below:

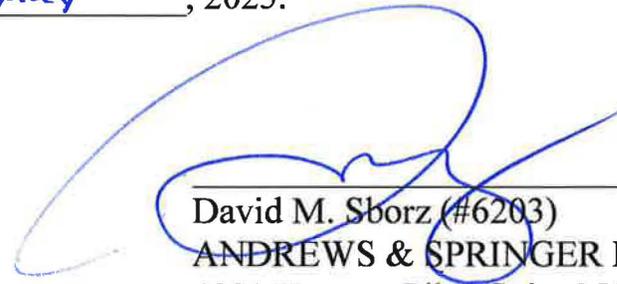
CATEGORY	AMOUNT
Court/Filing Fees	\$8,988.80
Court Runner Fees/Copying	\$1,018.93
<i>Pro Hac Vice</i> Fees	\$960.00

CATEGORY	AMOUNT
Travel Expenses/Airline, Hotel, Meals, Transportation	\$21.00
Court Reporters	\$288.00
TOTAL	\$11,276.73

9. The expenses pertaining to this case are reflected in the Firm's books and records which are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

I state under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct to the best of my knowledge.

Executed this 28th day of May, 2025.



 David M. Sborz (#6203)
 ANDREWS & SPRINGER LLC
 4001 Kennett Pike, Suite 250
 Wilmington, Delaware 19807
 (302) 504-4957

SWORN to and SUBSCRIBED before me on this 28 day of May, 2025.



 Notary Public

My Commission Expires: 3-15-2029

