

C.A. No. 2022-0721-JTL

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 1,231.50 for a total lodestar of \$704,927.50. A breakdown of the Firm's hours from inception through October 3, 2024, is as follows:

<b>NAME</b>	<b>HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
Gregory Del Gaizo (P)	333.00	\$1,015	\$337,995.00
Brian Robbins (P)	9.00	\$1,225	\$11,025.00
Craig W. Smith (P)	5.00	\$1,225	\$6,125.00
Mario D. Valdovinos (A)	294.75	\$525	\$154,743.75
Jacob W. Ogbozo (A)	80.75	\$560	\$45,220.00

<b>NAME</b>	<b>HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
Hickmon H. Friday (A)	87.25	\$485	\$42,316.25
Anna Marie Miller (PL)	107.75	\$350	\$37,712.50
Jennifer L. Silverwood (PL)	20.25	\$255	\$5,163.75
Jorgeanne A. Cabuhat (PL)	5.50	\$350	\$1,925.00
Brennan P. Whalen (CR)	119.25	\$275	\$32,793.75
Chloe L. Javen (CR)	105.75	\$175	\$18,506.25
Julia C. Vafiadis (CR)	17.75	\$195	\$3,461.25
Miles F. Baird (CR)	17.25	\$195	\$3,363.75
Brenna C. Resnick (CR)	16.00	\$175	\$2,800.00
Alexandra G. Super (CR)	12.25	\$145	\$1,776.25
<b>TOTAL</b>	<b>1,231.50</b>		<b>\$704,927.50</b>

(P) – Partner; (A) – Associate; (PL) – Paralegal; (CR) – Corporate Research<sup>1</sup>

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 75.50 for a total lodestar of \$62,600.00. A breakdown of the Firm’s hours from October 4, 2024, through April 2, 2025, is as follows:

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<sup>1</sup> 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.

<b>NAME</b>	<b>HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
Gregory Del Gaizo (P)	53.75	\$1,015	\$54,556.25
Brian Robbins (P)	0.75	\$1,225	\$918.75
Hickmon H. Friday (A)	1.25	\$485	\$606.25
Anna Marie Miller (PL)	14.50	\$350	\$5,075.00
Brennan P. Whalen (CR)	5.25	\$275	\$1,443.75
<b>TOTAL</b>	<b>75.50</b>		<b>\$62,600.00</b>

(P) – Partner; (A) – Associate; (PL) – Paralegal; (CR) – Corporate Research

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 1,307 for a total lodestar of \$767,527.50. A breakdown of the Firm's hours from inception through April 2, 2025, is as follows:

<b>NAME</b>	<b>HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
Gregory E. Del Gaizo (P)	386.75	\$1,015	\$392,551.25
Brian J. Robbins (P)	9.75	\$1,225	\$11,943.75
Craig W. Smith (P)	5.00	\$1,225	\$6,125.00
Mario D. Valdovinos (A)	294.75	\$525	\$154,743.75
Jacob W. Ogbozo (A)	80.75	\$560	\$45,220.00
Hickmon H. Friday (A)	88.50	\$485	\$42,922.50
Anna Marie Miller (PL)	122.25	\$350	\$42,787.50
Jennifer L. Silverwood (PL)	20.25	\$255	\$5,163.75

<b>NAME</b>	<b>HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>LODESTAR</b>
Jorgeanne A. Cabuhat (PL)	5.50	\$350	\$1,925.00
Brennan P. Whalen (CR)	124.50	\$275	\$34,237.50
Chloe L. Javen (CR)	105.75	\$175	\$18,506.25
Julia C. Vafiadis (CR)	17.75	\$195	\$3,461.25
Miles F. Baird (CR)	17.25	\$195	\$3,363.75
Brenna C. Resnick (CR)	16.00	\$175	\$2,800.00
Alexandra G. Super (CR)	12.25	\$145	\$1,776.25
<b>TOTAL</b>	<b>1,307</b>		<b>\$767,527.50</b>

(P) – Partner; (A) – Associate; (PL) – Paralegal; (CR) – Corporate Research

8. The Firm also has \$31,076.52 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:

<b>CATEGORY</b>	<b>AMOUNT</b>
Travel & Meals	\$5,432.47
Photocopies	\$438.20
Communications & Messaging	\$224.67
Research & Investigation	\$4,946.65
Discovery Costs	\$2,207.69
Mediation Fees	\$16,691.25
<b>TOTAL</b>	<b>\$31,076.52</b>

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.

Executed this 27th day of May, 2025.



Gregory E. Del Gaizo  
(admitted *pro hac vice*)

ROBBINS LLP

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San Diego, California 92122

(619) 525-3990

SWORN to and SUBSCRIBED before me  
on this 27th day of May, 2025.

  
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Notary Public

My Commission Expires:

