



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 JOHN C. HERMAN

STATE OF GEORGIA)
) ss.
COUNTY OF FULTON)

I, John C. Herman, being duly sworn, deposes and says:

1. I am a partner at the firm of Herman Jones LLP (“Herman Jones” or the “Firm”). Herman Jones 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/charges (“expenses”) in connection with services rendered in the Action.

3. Plaintiff’s counsel, including Herman Jones, 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. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment, including excluding hours for timekeepers recording fewer than 5.0 total hours. Based on these reviews and the adjustments made, 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. After the reductions referred to above, 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 123.3 for a total lodestar of \$84,296. A breakdown of the Firm's hours from inception through October 3, 2024 is as follows:

NAME		HOURS	RATE	LODESTAR
John Herman	(P)	39.5	1050	41,475
Carlton Jones	(A)	48.6	595	28,917
Yong Kim	(PL)	35.2	395	13,904
Grand Total		123.3		\$84,296

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

6. After the reductions referred to above, 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 (“Settlement Stipulation”) was filed), is 3.8 for a total lodestar of \$3,990. A breakdown of the Firm’s hours from October 4, 2024 through April 2, 2025 is as follows:

NAME		HOURS	RATE	LODESTAR
John Herman	(P)	3.8	1050	\$3,990
TOTAL		3.8		\$3,990

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

7. After the reductions referred to above, the number of hours spent on the Action by the Firm from inception through April 2, 2025 is 127.1 for a total lodestar of \$88,286. A breakdown of the Firm’s hours from inception through April 2, 2025 is as follows:

NAME		HOURS	RATE	LODESTAR
John Herman	(P)	43.3	1050	\$45,465
Carlton Jones	(A)	48.6	595	\$28,917
Yong Kim	(PL)	35.2	395	\$13,904
TOTAL		127.1		\$88,286

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

8. The Firm also has \$227 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
Travel & Meals	
Photocopies	\$142
Communications & Messaging	
Research & Investigation	\$85
Discovery Costs	
Mediation Fees	
TOTAL	\$227

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 Georgia that the foregoing is true and correct.

Dated: May 19, 2025

HERMAN JONES LLP



John C. Herman
(admitted *pro hac vice*)
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Attorneys for Plaintiff

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF GEORGIA)
) ss.
COUNTY OF FULTON)

Subscribed and sworn to (or affirmed) before me on this 19th day of May, 2025, by [Name], proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Alexis Skiba (Seal)

