



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

JOHN SOLAK,

Plaintiff,

v.

C.A. No.: 2023-0469-BWD

MOUNTAIN CREST CAPITAL LLC,  
SUYING LIU, DONG LIU, NELSON  
HAIGHT, TODD MILBOURN, AND  
WENHUA ZHANG,

Defendants.

**AFFIDAVIT OF BLAKE A. BENNETT ON BEHALF OF  
COOCH AND TAYLOR, P.A.**

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

BLAKE A. BENNETT, being duly sworn, deposes and says:

1. I am a Director at the law firm of Cooch and Taylor, P.A., and Plaintiff's Counsel in the above-captioned stockholder derivative action brought on behalf of Plaintiff, John Solak ("Plaintiff"), and similarly situated current and former stockholders of Mountain Crest Acquisition Corp. II ("MCAD" or the "Company"). I am duly licensed to practice before all courts in the State of Delaware. Unless otherwise indicated, the statements in this affidavit ("Affidavit") are made based on my personal knowledge, and if called to do so, I could and would testify to them.

2. I submit this Affidavit in support of the application for an award of attorneys' fees and expenses.

3. My firm resume is attached hereto as Exhibit A.

4. My firm acted as counsel for Plaintiffs and actively engaged in the prosecution of the Action by inter alia: researching the underlying facts and the claims to be asserted in the litigation; meeting and conferring with plaintiff's primary counsel regarding strategy and case law; researching and reviewing relevant case law; reviewing and revising all of the Court filings; communicating with defendants' counsel; and reviewing all court filings and communications.

5. From the commencement of the Action through July 10, 2025, the total number of hours spent on the litigation of the Action by my firm is 23.7. The total lodestar amount for attorney, paralegal, and professional staff time based on the firm's current rates is \$18,960.00. The schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

Name	Title	Rate	Hours	Lodestar
Blake A. Bennett	Director	\$800	23.7	\$18,960.00

6. My firm's compensation for services rendered in this case was wholly contingent on the success of the action for Plaintiff. None of the attorney's fees and expenses submitted to this Court has been paid from any source or has been the subject of any prior request or prior award in any litigation or other proceedings.

7. From the commencement of the Action through this date, my firm incurred a total of \$192.40 in unreimbursed expenses in connection with the prosecution of this Action. They are broken down as follows:

Disbursement	Total
Service of Process	\$0.00
Court Costs: Electronic Filing Fees, Court Clerk Charges	\$192.40
<b>TOTAL:</b>	\$192.40

8. The expenses incurred are reflected in the books and records contemporaneously prepared by the firm. These books and records are prepared from expense vouchers, invoices, and other billing records, and are an accurate record of the expenses incurred. As noted, I have reviewed the expenses for which reimbursement is sought and confirmed that they are reasonably necessary for the effective and efficient prosecution and resolution of the litigation and reasonable in amount. The expense is all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

Executed this 22nd day of September, 2025.



BLAKE BENNETT (#5133)  
Cooch and Taylor, P.A.  
1000 N. West St., Suite 1500  
Wilmington, DE 19801

SWORN TO AND SUBSCRIBED  
before me this 22<sup>nd</sup> day of September, 2025.

Cynthia L. Stritzinger  
Notary Public

October 1, 2028  
My Commission Expires

