

“Company”).¹ 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. Newman Ferrara is based in New York, New York but maintains a national-focused class action and complex litigation practice in the areas of securities, shareholder litigation, consumer and product litigation, real estate, and civil rights. The firm has litigated numerous stockholder derivative actions in the State of Delaware and in federal and state courts around the country. A copy of Newman Ferrara’s firm resume is attached hereto as Ex. A.

3. I am the Newman Ferrara attorney primarily responsible for the Firm’s work in this Action. I conducted and oversaw our day-to-day litigation activities, and supervised the Newman Ferrara attorneys and staff who worked on the case.

4. I submit this Affidavit in support of Plaintiff’s Motion to Approve Settlement, Certify the Class, for Attorneys’ Fees and Expenses, and for an Incentive Award (the “Motion”), which is being filed contemporaneously herewith.

5. Newman Ferrara’s compensation for services rendered and out of pocket expenses incurred in this case was, and is, entirely contingent on the success of the Action in providing the Class a substantial benefit, and on the Court’s approval

¹ Unless otherwise noted, all capitalized terms have the same definition as set forth in the Stipulation of Compromise and Settlement, executed and submitted to the Court on July 10, 2025 (the “Stipulation”).

of the fee and expense award. None of the attorneys' fees and expenses submitted to this Court has been paid from any other source or been the subject of any prior request or award.

6. Newman Ferrara, in particular, devoted a total of 744 hours to the investigation, commencement, litigation, and resolution of the Action. These hours are based on contemporaneous time records maintained by the firm's lawyers and staff. Based on my familiarity with the Action, I reviewed the entries to confirm the reasonableness of the time and expenses committed to the Action, and in an abundance of caution, I deleted entries whenever I had any doubt about the utility of the task or reasonableness of the time billed. I firmly believe that the time reflected in my firm's lodestar calculation is reasonable in amount and was reasonably necessary for the effective prosecution and successful resolution of the Action.

7. Newman Ferrara incurred a total lodestar of approximately \$585,725. The "Lodestar Table" below reflects the: (a) the name(s) and position(s) of the attorney(s) timekeeper who undertook litigation activities in connection with the Action; (b) total number of hours the timekeeper reported expending in connection with such work from the preliminary investigation of this action in February 2023 to July 10, 2025; (c) the timekeeper's current hourly rate; (d) total billable amount, in dollars, of such work by each timekeeper; and (e) summary total of Newman Ferrara's total hours and lodestar.

LODESTAR TABLE

Timekeeper	Position	Rate	Hours	Lodestar
Jeffrey M. Norton	Partner	\$1000.00	257	\$328,725.00
Benjamin D. Baker	Sr. Associate	\$675.00	487	\$257,000.00
TOTAL				\$585,725.00

8. The Lodestar Table above was prepared based on, *inter alia*, my activities in this Action as well as my review of my Newman Ferrara's contemporaneous, daily time records, maintained in the ordinary course of business, and related to work performed in this action.² These records are available for an *in camera* review at the request of the Court.

9. The hourly rates charged by attorneys are the firm's regular rates for contingent cases and those charged to clients for their services in non-contingent/hourly matters.³ Based on my knowledge, experience and research, the rates charged are within the range of rates normally and customarily charged by attorneys of similar qualifications and experience in cases similar to this matter.

² Although the underlying work of other attorneys reflected in the hours in the Lodestar Table are based not upon my personal knowledge but rather upon the information reported by each timekeeper and maintained in the files and business records of Newman Ferrara, the same were reviewed by me and, to the best of my knowledge, accurately reflect the time and services rendered in connection with this matter.

³ Standard rates on hourly matters are sometimes adjusted through negotiated discounts or alternative billing arrangements.

10. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for paralegal and administrative time or expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

11. Plaintiff's Counsel incurred a total of \$76,287 in unreimbursed expenses in connection with the prosecution of this action. That sum includes \$76,095 in unreimbursed expenses incurred by Newman Ferrara (*see* below Table) and \$192 incurred by Cooch and Taylor.⁴

12. The "Expense Table" below reflects the: (a) description or nature of the expense item(s); (b) amount of the expense; and (c) summary total of all unreimbursed expenses incurred by Newman Ferrara.

EXPENSE TABLE

Description	Amount
Consultants/Experts	\$2,500.00
Court costs/filing fees	\$4,742.00
Service fees	\$600.00
Document Reproduction	\$424.00
Analyst and Corp. Reports	\$2,200.00
Travel and Meals	\$720.00
Notice and Administration	\$65,000.00 ⁵
Overnight mail	\$101.00

⁴ Bennett Decl. ¶ 7.

⁵ Estimate based on projected costs.

TOTAL	\$76,287.00
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13. The expenses listed exclude administrative costs, billable time, and legal research assessments.

14. In my judgment, these expenses were reasonable and necessary, and expended for the benefit of Plaintiff and the Company.

15. The expenses accurately reflect costs incurred by Newman Ferrara in connection with the litigation of this action and were obtained from the books and records of my firm, prepared in the ordinary course of business, and based on receipts, expense vouchers, check records, invoices, and other source material. Such books and records are available for an *in camera* review at the request of the Court.

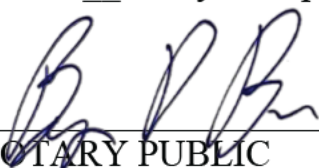
16. Attached hereto are true and correct copies of the following exhibits:

Exhibit A: Firm resume of Newman Ferrara;



JEFFREY M. NORTON

Sworn to and subscribed to me
on this 23rd day of September, 2025



NOTARY PUBLIC