



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

AARON OFFRINGA and MICHAEL)
FARZAD, Individually and on Behalf of)
All Others Similarly Situated,)

Plaintiffs,)

v.)

C.A. No. 2023-0929-LWW

DMY SPONSOR II, LLC, HARRY L.)
YOU, NICCOLO DE MASI, DARLA)
K. ANDERSON, FRANCESCA)
LUTHI, and CHARLES E. WERT,)

Defendants.)

**AFFIDAVIT OF ERIK W. LUEDEKE IN SUPPORT OF AN AWARD OF
ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA)
) :SS
COUNTY OF SAN DIEGO)

I, Erik W. Luedeke, being duly sworn, depose and say:

1. I am a partner of Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") and a member of good standing of the California Bar. I am submitting this affidavit in support of an award of attorneys' fees and expenses and charges ("expenses") in connection with services rendered in the above-captioned action (the "Action").

2. Robbins Geller served as counsel to plaintiffs Aaron Offringa and Michael Farzad (together, "Plaintiffs") in this Action and took on this representation on a fully contingent basis.

3. The information in this affidavit regarding Robbins Geller time and expenses is taken from time and expense records maintained by the Firm in the ordinary course of business. I reviewed my Firm's time and expense entries 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 for, the time and expenses committed to the litigation. As part of this review, I removed certain time entries for attorneys and paraprofessionals who contributed *de minimus* time to this Action. I believe that the time reflected in my resulting lodestar calculation and the expenses for which payment is sought as set forth in this affidavit are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal market place.

4. After the adjustments for *de minimus* timekeeper entries described above, the attorneys and paraprofessionals at my Firm dedicated 276.60 hours through October 10, 2025 (the day the parties executed and filed the stipulation of settlement) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$252,403.50, based on the Firm's current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the hours and lodestar is as follows:

TIMEKEEPER	TOTAL HOURS THROUGH 10/10/25	RATE	TOTAL LODESTAR THROUGH 10/10/25
PARTNERS			
Baron, Randall J.	24.30	1,390	\$ 33,777.00
Luedeke, Erik W.	159.30	980	156,114.00
ASSOCIATES			
Bolton, Tayler D.	55.50	590	32,745.00
OF COUNSEL			
Avellino, Jason M.	29.90	885	26,461.50
PARAPROFESSIONAL			
McDade, Jaime A. (PL)	7.60	435	3,306.00
TOTAL	276.60		\$ 252,403.50

5. After the adjustments for *de minimus* timekeeper entries described above, the attorneys and paralegals at my Firm dedicated 245.10 hours through February 21, 2025 (the day the parties reached an agreement in principle to settle the Action) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$221,923.00, based on the Firm's current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the Firm's hours and lodestar from inception through February 21, 2025 is as follows:

TIMEKEEPER	TOTAL HOURS THROUGH 02/21/25	RATE	TOTAL LODESTAR THROUGH 02/21/25
PARTNERS			
Baron, Randall J.	24.30	1,390	\$ 33,777.00
Luedeke, Erik W.	131.90	980	129,262.00
ASSOCIATES			
Bolton, Tayler D.	55.50	590	32,745.00
OF COUNSEL			
Avellino, Jason M.	25.80	885	22,833.00
PARAPROFESSIONAL			
McDade, Jaime A. (PL)	7.60	435	3,306.00
TOTAL	245.10		\$ 221,923.00

6. At high level, the work performed by my Firm during the period from inception through October 25, 2025 included: (i) investigating the claims underlying the Action; (ii) preparing the complaint; (iii) opposing Defendants' motion to dismiss; (iv) serving and responding to requests for production and interrogatories; and (v) undertaking work in connection with the settlement in this Action.

7. During the course of this Action, Robbins Geller incurred and disbursed \$19,150.79 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

ROBBINS GELLER DISBURSEMENTS	
Filing Fees	\$ 1,350.70
Transportation, Hotels, and Meals	7,891.57
Experts (Matthew D. Cain (d/b/a Cleveland Analytics, LLC))	3,500.00
Outside Photocopies	75.20
Online Legal and Financial Research	83.32
Mediation Fees (Phillips ADR Enterprises, P.C.)	6,250.00
Total Disbursements:	\$ 19,150.79

8. These expenses are reflected in the books and records of the Firm. These books and records are prepared from invoices, bills, expense vouchers, and check records kept in the normal course of business.

9. I respectfully request that the Court award the attorneys' fees and expenses requested for the reasons set forth in Plaintiffs' Opening Brief in Support

of their Motion to Certify the Class, Approve the Settlement, for Attorneys' Fees and Expenses, and for Service Awards.

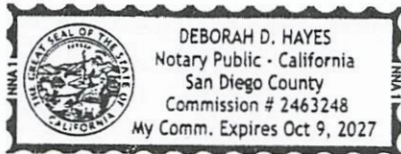
Dated: January 21, 2026



Erik W. Luedeke (#249211)
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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.

Subscribed and sworn to (or affirmed) before me on this 21st day of January, 2026, by Erik W. Luedeke, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public, State of California