



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.

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

Defendants.

C.A. No. 2023-0929-LWW

**AFFIDAVIT OF GREGORY E. DEL GAIZO IN SUPPORT OF AN AWARD
OF ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA

: SS

COUNTY OF SAN DIEGO

I, Gregory E. Del Gaizo, being duly sworn, depose and say:

1. I am a partner of Robbins LLP ("Robbins") 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 incurred in connection with services rendered in the above-captioned action (the "Action").

2. Robbins served as Co-Lead 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' time and expenses is taken from time and expense records maintained by my 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 paralegals 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 reasonably 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 paralegals at my firm dedicated 290 hours through October 10, 2025 (the day the settlement stipulation was signed) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$202,762.50, based on Robbins' 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 10/10/2025	RATE	TOTAL LODESTAR THROUGH 10/10/2025
Partners			
Gregory Del Gaizo	141.25	\$1,015	\$143,368.75
Brian J. Robbins	9.25	\$1,225	\$11,331.25
Associates			
Grant M. Klasna	24.75	\$485	\$12,003.75
Mario D. Valdovinos	10.00	\$525	\$5,250.00
Paralegals			
Anna Marie Miller	45.50	\$350	\$15,925.00
Corporate Research¹			
Brennan P. Whalen	33.75	\$275	\$9,281.25
Chloe L. Javen	16.00	\$175	\$2,800.00
Litigation Support			
Jerrad Juanich	9.50	\$295	\$2,802.50
TOTAL	290.00		\$202,762.50

5. After the adjustments for *de minimus* timekeeper entries described above, the attorneys and paralegals at my firm dedicated 275.50 hours through February 21, 2025 (the day of the agreement in principle to settle the Action was signed) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$188,396.25, based on Robbins' current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the hours and lodestar from inception through February 21, 2025, is as follows:

¹ 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.

TIMEKEEPER	TOTAL HOURS THROUGH 2/21/2025	RATE	TOTAL LODESTAR THROUGH 2/21/2025
Partners			
Gregory Del Gaizo	127.25	\$1,015	\$129,158.75
Brian J. Robbins	9.25	\$1,225	\$11,331.25
Associates			
Grant M. Klasna	24.75	\$485	\$12,003.75
Mario D. Valdovinos	10.00	\$525	\$5,250.00
Paralegals			
Anna Marie Miller	45.25	\$350	\$15,837.50
Corporate Research²			
Brennan P. Whalen	33.50	\$275	\$9,212.50
Chloe L. Javen	16.00	\$175	\$2,800.00
Litigation Support			
Jerrad Juanich	9.50	\$295	\$2,802.50
TOTAL	275.50		\$188,396.25

6. At high level, the work performed by my firm during the period from inception through October 10, 2025 included: (i) investigating the claims underlying the Action; (ii) preparing the complaint; (iii) opposing Defendants' motion to dismiss; (iv) engaging in written discovery directed to both Plaintiffs and Defendants, as well as third parties, including interrogatories, requests for production, subpoenas, and the review of document productions; and (v) undertaking work in connection with the settlement of this Action. The work performed by Robbins during the period from February 21, 2025 through October 10, 2025, included undertaking work in connection with the settlement in this Action in this

² 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.

Court, and negotiating and drafting the Stipulation and related exhibits.

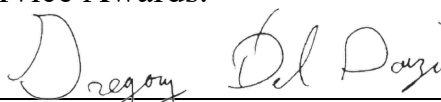
7. During the course of this Action, Robbins incurred and disbursed \$12,240.42 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

DISBURSEMENTS	
Travel & Meals	\$ 3,186.60
Photocopies	\$ 19.00
Research & Investigation	\$ 2,072.56
Discovery Costs	\$ 550.10
Filing/Service Fees	\$ 162.16
Mediation Fees	\$ 6,250.00
Total Disbursements:	\$ 12,240.42

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

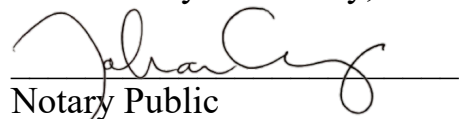
9. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested for the reasons set forth in Plaintiffs' Opening Brief in Support of Their Motion to Certify the Class, Approve the Settlement, for Attorneys' Fees and Expenses, and for Service Awards.

Dated: January 21, 2026



Gregory E. Del Gaizo

SWORN and SUBSCRIBED before me
this 21st day of January, 2026,



Notary Public

My Commission Expires: 02/24/2027

