

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

SHUHUAN YU, Individually and on)
Behalf of All Others Similarly Situated,)
)
Plaintiff,)

v.)

C.A. No. 2021-0932-NAC

RMG SPONSOR, LLC, MKC)
INVESTMENTS LLC, ROBERT S.)
MANCINI, PHILIP KASSIN, D.)
JAMES CARPENTER, W. GRANT)
GREGORY, CRAIG BRODERICK, W.)
THADDEUS MILLER, and STEVEN)
P. BUFFONE,)
)
Defendants.)

AFFIDAVIT OF GREGORY E. DEL GAIZO

STATE OF CALIFORNIA)
) ss.:
COUNTY OF SAN DIEGO)

I, GREGORY E. DEL GAIZO, being duly sworn, deposes and says:

1. I am a member of the firm of Robbins LLP (“Robbins” or the “Firm”).

I was actively involved in the prosecution of the above-captioned action (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 am submitting this affidavit in support of my Firm’s application for an award of attorneys’ fees, expenses and charges (“expenses”) in connection with services rendered in the Action.

3. Robbins is counsel for Plaintiff Shuhuan Yu and the Class herein. Plaintiff's counsel, including Robbins, represented Plaintiff in this Action on a fully contingent basis. All costs and expenses in this case were borne by either my firm or co-counsel at Robbins Geller Rudman & Dowd LLP or Andrews & Springer LLC.

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/or maintained by the Firm in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the Action and I reviewed these reports (and backup documentation where necessary or appropriate) 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. 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 November 6, 2023 is 690.75. The number of hours spent on the Action by my Firm from November 7, 2023 through

June 17, 2024 is 92. A breakdown of the hours and lodestar for both time periods is provided in the tables below. The hourly rates shown below are the Firm’s current rates in contingent cases set by the Firm for each individual. These hourly rates are consistent with hourly rates submitted by the Firm to state and federal courts in other securities/stockholder class and derivative litigation. The Firm’s rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. For personnel who are no longer employed by the Firm, the “current rate” used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm.

Inception through November 6, 2023¹

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Gregory E. Del Gaizo	(P)	243.50	\$1,015	\$247,205.00
Brian J. Robbins	(P)	49.00	\$1,225	\$60,025.00
George Aguilar	(P)	45.75	\$1,225	\$56,043.75
Craig W. Smith	(P)	5.25	\$1,225	\$6,431.25
Mario D. Valdovinos	(A)	101.50	\$525	\$53,287.50
Michelle B. Gaulin	(A)	10.5	\$485	\$5,092.50
Anna Marie Miller	(PL)	37.75	\$350	\$13,212.50
Ricardo Salazar	(PL)	37.00	\$350	\$12,950.00
Shab Saadatkah	(PL)	16.25	\$255	\$4,143.75
Brennan P. Whalen	(CR)	67.75	\$275	\$18,631.25
Chloe L. Javen	(CR)	38.50	\$175	\$6,737.50
Brenna C. Resnick	(CR)	24.25	\$175	\$4,243.75
Julia C. Vafiadis	(CR)	6.25	\$195	\$1,218.75
Alexandra G. Super	(CR)	7.50	\$145	\$1,087.50
<i>TOTAL</i>		<i>690.75</i>		<i>\$490,310.00</i>

(P) Partner

¹ November 6, 2023 was the date the Parties accepted the mediator’s proposal to settle the Action.

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
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(A) Associate
(PL) Paralegal
(CR) Corporate Research²

November 7, 2023 through June 17, 2024³

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Gregory E. Del Gaizo	(P)	17.75	\$1,015	\$18,016.25
George Aguilar	(P)	5.00	\$1,225	\$6,125.00
Brian J. Robbins	(P)	1.25	\$1,225	\$1,531.25
Mario D. Valdovinos	(A)	24.25	\$525	\$12,731.25
Anna Marie Miller	(PL)	32.00	\$350	\$11,200.00
Brennan P. Whalen	(CR)	11.75	\$275	\$3,231.25
<i>TOTAL</i>		<i>92.00</i>		<i>\$52,835.00</i>

(P) Partner
(A) Associate
(PL) Paralegal
(CR) Corporate Research

6. The Firm also has \$16,424.23 in expenses and charges in connection with the prosecution of the Action. The expenses and charges are summarized by category below:

² The Firm's Corporate Research Department consists of a group of trained professionals dedicated to investigating various acts of corporate malfeasance. The Corporate Research team conducted substantial factual research and investigation, including, among other things: researching and identifying facts that formed the basis of the allegations; monitoring, analyzing, and circulating to the members of the litigation team relevant public filings, media articles, pleadings in our corporate and securities practice, and other public information. The non-attorney time devoted to this matter by the Corporate Research team substantially reduced the number of attorney hours required to effectively prosecute the Action and reduced the Firm's average effective billing rate and lodestar.

³ June 17, 2024 was the date the Parties executed and filed the Stipulation and Agreement of Compromise, Settlement, and Release.

<i>CATEGORY</i>	<i>AMOUNT</i>
Travel & Meals	\$ 5,600.06
Photocopies	\$ 213.00
Research & Investigation	\$ 2,284.17
Discovery Costs	\$ 42.00
Filing/Service Fees	\$ 160.00
Mediation Fees	\$ 8,125.00
<i>TOTAL</i>	\$ 16,424.23

7. 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 Delaware that the foregoing is true and correct. Executed this 11th day of September, 2024, at San Diego, California.

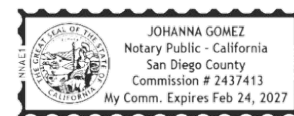
Gregory Del Gaizo

 GREGORY E. DEL GAIZO

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 11th day of September, 2024, by Gregory E. Del Gaizo, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature *Johanna Gomez* (Seal)
 Notary Public, State of California



Commission expires: 02/24/27