



# GRANTED WITH MODIFICATIONS

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE TS INNOVATION  
ACQUISITIONS SPONSOR, L.L.C.  
STOCKHOLDER LITIGATION

CONSOLIDATED  
C.A. NO. 2023-0509-LWW

## **[PROPOSED] ORDER DIRECTING SUPPLEMENTAL NOTICE AND CLAIM SUBMISSION DEADLINE**

WHEREAS, on December 2, 2024, Plaintiffs submitted a Stipulation and Agreement of Compromise, Settlement, and Release (Trans. ID 75103023) (the “Stipulation”<sup>1</sup>) and accompanying exhibits, including a Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the “Notice”), a Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action Settlement Hearing, and Right to Appear (the “Summary Notice” and with the Notice the “First Notice”), and a Plan of Allocation (the “First Plan of Allocation”);

WHEREAS, there was an inconsistency between the First Notice on the one hand, and the First Plan of Allocation on the other hand, in that the First Notice indicated Stockholders need not submit a claim to maximize their recovery from the

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<sup>1</sup> Capitalized terms not specifically defined herein shall have the same meaning as set forth in the December 19, 2024 Scheduling Order with Respect to Notice and Settlement Hearing (Trans. ID 75270151).

Net Settlement Fund, whereas the First Plan of Allocation contemplated a claims process;

WHEREAS, on March 14, 2025, Plaintiffs discovered this discrepancy and notified the Court;

WHEREAS, on March 27, 2025, the Court held a hearing on the fairness, reasonableness, and adequacy of the Settlement, the proposed plans of allocation, and the application by Class Counsel for a Fee and Expense Award and Incentive Awards (the “Fairness Hearing”); and

WHEREAS, at the Fairness Hearing, the Court adopted the First Plan of Allocation and further directed Plaintiffs’ Counsel to send a Supplemental Notice to Class members informing them of the need to submit Proofs of Claim;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Court approves A.B. Data, Ltd. as the Settlement Administrator to provide supplemental notice to the Class and administer the claims process and the Settlement, including the allocation and distribution of the Settlement Fund.

2. The Court approves, in form and substance, the Supplemental Corrected Notice of Claims Process and Plan of Allocation, including the Proof of Claim attached thereto as Exhibit A, substantially in the form filed by Plaintiffs with the Court on April \_\_\_, 2025 (Trans. ID \_\_\_\_ ) (the “Supplemental Corrected

Notice”) and the Supplemental Corrected Summary Notice of Claims Process and Plan of Allocation substantially in the form filed by Plaintiffs with the Court on April \_\_\_, 2025 (Trans. ID \_\_\_) (the “Supplemental Corrected Summary Notice”).

3. The Court finds that the mailing of the Supplemental Corrected Notice and publication of the Supplemental Corrected Summary Notice in substantially the manner set forth in this Order, constitute the best notice practicable under the circumstances to all persons entitled to such notice of the proposed claims process and modification to the plan of allocation in satisfaction of Delaware Court of Chancery Rule 23, the requirements of due process, and all other applicable law and rules.

4. Within 10 business days following entry of this Order (the “Notice Date”), the Settlement Administrator shall: (i) cause the Supplemental Corrected Notice, substantially in the form submitted by Plaintiffs on April \_\_\_, 2025, to be delivered to each Settlement Class Member in the manner prescribed in the Scheduling Order; (ii) cause the Supplemental Corrected Summary Notice, substantially in the form submitted by Plaintiffs on April \_\_\_, 2025 (Trans. ID \_\_\_\_\_), to be published in the manner prescribed in the Scheduling Order, and (iii) post the Supplemental Corrected Notice and Supplemental Corrected Summary Notice on the Settlement Administrator’s website in the manner prescribed in the Scheduling Order.

5. Within 90 calendar days after the Notice Date, each Person claiming to be a Class Member shall be required to submit to the Claims Administrator a completed Proof of Claim, substantially in the form attached to the Notice as Exhibit A and as approved by the Court, signed under penalty of perjury and supported by such documents as are specified in the Proof of Claim and as are reasonably available to such Person. Each Proof of Claim shall be deemed to have been submitted when legibly postmarked (if properly addressed and mailed by first class mail) or received (if submitted online). Any Proof of Claim submitted in any other manner shall be deemed to have been submitted when it was actually received by the Claims Administrator at the address designated in the Notice.

6. All other terms of the Scheduling Order remain in full force and effect.

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Vice Chancellor Lori W. Will

This document constitutes a ruling of the court and should be treated as such.

**Court:** DE Court of Chancery Civil Action

**Judge:** Lori W. Will

**File & Serve**

**Transaction ID:** 75999267

**Current Date:** Apr 04, 2025

**Case Number:** 2023-0509-LWW

**Case Name:** CONS WITH/ 2023-0514-LWW; 2023-0540-LWW - CONF ORD - In Re TS Innovation Acquisitions Sponsor, L.L.C. Stockholder Litigation

**Court Authorizer**

**Comments:**

The Supplemental Corrected Notice and Supplemental Corrected Summary Notice referenced in this Order were filed on April 3, 2025. These notices are approved.

After notice is disseminated and an affidavit of notice has been filed, the parties are asked to contact the court to schedule a time for the court to deliver a bench ruling on the motion to approve the settlement, certify the class, and for an award of attorneys' fees and expenses.

**/s/ Judge Lori W. Will**