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Case No. 2023-0509-LWW



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March 14, 2025

**VIA FILE&SERVEXPRESS AND HAND DELIVERY**

The Honorable Lori W. Will  
Vice Chancellor  
Delaware Court of Chancery  
Leonard L. Williams Justice Center  
500 N. King Street  
Wilmington, DE 19801

Re: ***In re TS Innovation Acquisitions Sponsor, L.L.C. Stockholder  
Litigation, Consol. C.A. No. 2023-0509-LWW (Del. Ch.)***

Vice Chancellor Will:

I write on behalf of the Plaintiffs in the above-referenced action. When preparing for the settlement approval hearing set for March 27, 2025, Plaintiffs discovered that Exhibits E and E-1 to the Stipulation and Agreement of Settlement, Compromise, and Release filed on December 2, 2024 (Trans. ID 75103023) mistakenly set forth a plan of allocation that contemplated a settlement claims submission process. Exhibits E and E-1, thus, were inconsistent with the Plan of Allocation set forth in the Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear and the

Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (collectively the “Notice”) provided to stockholders in connection with this proposed settlement,<sup>1</sup> and were filed in error. As set forth in the Notice, if the settlement is approved by the Court, the net settlement fund will be distributed on a pro rata basis to all eligible members of the proposed class. Pursuant to this plan of allocation, eligible class members are not required to submit a proof of claim in order to receive their distributions from the net settlement fund and will be deemed to have released their claims upon the Court’s entry of an Order and Final Judgment approving the settlement.

Plaintiffs therefore submit the enclosed Corrected Exhibit E – Proposed Plan of Allocation and seek to withdraw Exhibit E-1 – Proof Claim, as consistent with the Notice provided to stockholders in connection with the proposed settlement.

As will be set forth in Plaintiffs’ forthcoming affidavit, no Class member has submitted any objection to the settlement or the proposed plan of allocation set forth in the Notice and Corrected Exhibit E. Plaintiffs’ counsel has conferred with A.B. Data, which has advised that no stockholders contacted A.B. Data to submit a claim.

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<sup>1</sup> Affidavit of Jack Ewashko Regarding: (A) Mailing of the Notice; and (B) Publication of the Summary Notice (Trans. ID 75645404).

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We are available to answer any questions the Court may have regarding this matter.

Respectfully,

/s/ Kelly L. Tucker

Kelly L. Tucker (#6382)

**WORDS: 317/1,000**

Enclosures

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