



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GEORGE ASSAD and)
CHRISTOPHER L. BEUER,)
)
Plaintiffs,)
)
v.)
)
TPG INC., TPG CANNES)
AGGREGATION, L.P., SHARAD S.)
MANSUKANI, PAUL V.)
CAMPANELLI, STEPHEN C.)
FARRELL, and W. CARL)
WHITMER,)
)
Defendants.)

C.A. No. 2023-0096-LWW

**TRANSMITTAL AFFIDAVIT OF SETH T. FORD IN SUPPORT OF
PLAINTIFFS' BRIEF IN SUPPORT OF CLASS CERTIFICATION,
THE PROPOSED SETTLEMENT AND AN AWARD OF
ATTORNEYS' FEES AND EXPENSES**

I, Seth T. Ford, do hereby certify on this 12th day of June, 2024 that:

1. I am a member of the Bar of the State of Delaware and an attorney at the law firm Prickett, Jones & Elliott, P.A., counsel for Plaintiff Christopher L. Beuer in the above-captioned matter.
2. I submit this Transmittal Affidavit in support of Plaintiffs' Opening Brief in Support of Class Certification, the Proposed Settlement and an Award of Attorneys' Fees and Expenses.

3. Attached hereto are true and correct copies of the following documents:

Exhibit	Date	Description
1.	9/1/2022	Excerpt from Schedule 14C Information Statement for Convey Health Solutions Holdings, Inc.
2.	3/2022	Convey Discussion Materials (TPG_CNVY_00000414) [CONFIDENTIAL]
3.	3/24/2022	Email from Sharad Mansukani to Katherine Wood re: Board Update (CONVEY_SPCOMM-0020341) [CONFIDENTIAL]
4.	3/31/2022	Houlihan Lokey - Convey Health Solutions, Inc. Goodwill Impairment Analysis (CONVEY_00030494) [CONFIDENTIAL]
5.	4/2022	Convey Discussion Materials (TPG_CNVY_00011152) [CONFIDENTIAL]
6.	4/13/2022	Email from Stephen Farrell to Carl Whitmer et al. re: Board Update (CONVEY_SPCOMM-0020632) [CONFIDENTIAL]
7.	4/25/2022	Email from Aaron M. Gruber to Marnie J. Lerner re: Potential Special Committee Assignment (ASSAD_CSM_00000003) [CONFIDENTIAL]
8.	5/3/2022	Convey Health Solutions Holdings, Inc. Minutes of the Meeting of the Board of Directors (CONVEY_00017882) [CONFIDENTIAL]
9.	5/4/2022	Chat with Carl (William) Whitmer and Stephen C. Farrell (CONVEY_00052706) [CONFIDENTIAL]
10.	5/4/2022	Letter from TPG Capital, L.P. to Convey Health Solutions (CONVEY_ASSAD_00000741) [CONFIDENTIAL]
11.	5/6/2022	Multiple Minutes of Meetings of the Special Committee of the Board of Directors of Convey Health Solutions Holdings, Inc. (CONVEY_00000680) [CONFIDENTIAL]

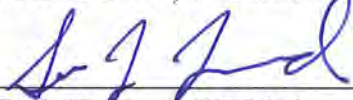
12.	5/27/2022	Letter from Centerview Partners to Special Committee of the Board of Directors of Convey Health Solutions Holdings, Inc. (CENTERVIEW_00003786) [CONFIDENTIAL]
13.	5/31/2022	Centerview Partners Project Commodore Confidential Discussion Materials (CONVEY_SPCOMM-0007680) [CONFIDENTIAL]
14.	6/8/2022	Email from Brett Carlson to Matt Holt re: Call with Steve Farrell (EIR_0000191) [CONFIDENTIAL]
15.	6/9/2022	Ares – Convey Situation Update – Incremental Investment (ARES-CONVEY-00000001) [CONFIDENTIAL]
16.	6/9/2022	Email from Brett Carlson to Matt Holt re: Call with Steve Farrell (EIR_0000192) [CONFIDENTIAL]
17.	6/9/2022	Email from Todd Sisitsky to Matt Holt re: Call (NMC_CNVY_00001107) [CONFIDENTIAL]
18.	6/15/2022	Email from Alan Hartman to Marni J. Lerner et al. re: Update/ Atty Client Privileged (CONVEY_SPCOMM-0009292) [CONFIDENTIAL]
19.	6/17/2022	Excerpt from Convey Excel Workbook – Mgmt Summary (CENTERVIEW_00000437) [CONFIDENTIAL]
20.	6/20/2022	Centerview Partners Project Commodore Confidential Discussion Materials (CENTERVIEW_00014628) [CONFIDENTIAL]
21.	6/20/2022	Centerview Partners Project Commodore Confidential Discussion Materials (CONVEY_SPCOMM-0012965) [CONFIDENTIAL]
22.	6/22/2022	Email from Matt Holt to Adam Weinstein re: Convey Health Solutions to Be Taken Private by TPG Capital – The Wall Street Journal (NMC_CNVY_00001539) [CONFIDENTIAL]

23.	7/1/2022	Email from Michael Hammond to Brett Carlson re: CNVY (EIR_0000103) [CONFIDENTIAL]
24.	8/4/2022	Chat with Sharad Mansukani and Tim Fairbanks (CONBVEY_00052593) [CONFIDENTIAL]
25.	6/2/2023	Defendant Paul V. Campanelli's Responses and Objections to Plaintiffs' Second Set of Interrogatories (Nos. 1-17) Directed to All Defendants (<i>George Assad et al. v. TPG Inc. et al</i> , C.A. No. 2023-0096-LWW) [CONFIDENTIAL]
26.	6/2/2023	Defendant W. Carl Whitmer's Responses and Objections to Plaintiffs' Second Set of Interrogatories (Nos. 1-17) Directed to All Defendants (<i>George Assad et al. v. TPG Inc. et al</i> , C.A. No. 2023-0096-LWW) [CONFIDENTIAL]
27.	12/20/2023	Deposition Transcript of Paul Campanelli (<i>George Assad et al. v. TPG Inc. et al</i> , C.A. No. 2023-0096-LWW) [CONFIDENTIAL]

I declare under penalty of perjury under the laws of Delaware that the forgoing is true and correct.

Executed on this 12th day of June, 2024.

PRICKETT, JONES & ELLIOTT, P.A.



Seth T. Ford (#7051)
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(302) 888-6500

Counsel for Plaintiff Christopher Beuer

SWORN TO AND SUBSCRIBED before me,
this 12th day of June, 2024.



Notary Public Regina Maria Malloy
State of Delaware, New Castle County
My Commission Expires: 7/26/2024



CERTIFICATE OF SERVICE

I, Seth T. Ford, do hereby certify on this 12th day of June, 2024, that I caused a copy of *Transmittal Affidavit of Seth T. Ford in Support of Plaintiffs' Opening Brief in Support of Class Certification, the Proposed Settlement and an Award of Attorneys' Fees and Expenses* to be served via File & ServeXpress upon the following counsel:

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/s/ Seth T. Ford
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