



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

GEORGE ASSAD and)
CHRISTOPHER L. BEUER,)

Plaintiffs,)

v.)

C.A. No. 2023-0096-LWW

TPG INC., TPG CANNES)
AGGREGATION, L.P., SHARAD S.)
MANSUKANI, PAUL V.)
CAMPANELLI, STEPHEN C.)
FARRELL, and W. CARL)
WHITMER,)

Defendants.)

**AFFIDAVIT OF ERIC J. JURAY IN SUPPORT OF
AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF DELAWARE :
 : ss
COUNTY OF NEW CASTLE :

I, Eric J. Juray, being duly sworn, depose and say:

1. I am a Director of Prickett, Jones & Elliott, P.A. ("Prickett Jones"), and a member in good standing of the Delaware Bar.

2. I submit this Affidavit in support of the request for an award of attorneys' fees and expenses.

3. Prickett Jones served as Counsel to Plaintiff Christopher Beuer in the above-captioned action (the "Action").

4. Based on the daily time records maintained by my firm, attorneys, law clerks, and summer associates at Prickett Jones recorded 978.60 hours in time from June 23, 2022 through February 27, 2024, when the settlement term sheet was executed. A breakdown of Prickett Jones' hours at current hourly billing rates is as follows:

Name	Hours	Rate	Value at Current Hourly Rate
Eric J. Juray	187.70	\$700	\$131,390.00
Kevin H. Davenport	159.40	\$850	\$135,490.00
Michael Hanrahan	1.20	\$1,300	\$1,560.00
Corinne Elise Amato	22.70	\$850	\$19,295.00
Stacey A. Greenspan	237.10	\$650	\$154,115.00
Jason W. Rigby	0.50	\$525	\$262.50
Seth T. Ford	289.90	\$350	\$101,465.00
David C. Skoranski	28.20	\$425	\$11,985.00
Caitlin Whetham (Law Clerk)	21.10	\$275	\$5,802.50
Brianna V. Manobianco (Summer Associate)	3.60	\$250	\$900.00
Christine N. Chappellear	3.70	\$375	\$1,387.50
Kirsten M. Valania	23.50	\$375	\$8,812.50
TOTAL:	978.60		\$572,465.00

5. Based on records maintained by my firm, the total expenses incurred by Prickett Jones from inception of the Action through June 1, 2024 are as follows:

Description	Amount
Contribution to Litigation Fund	\$18,500.00
Filing, Printing and Recording Costs	\$5,413.85
Messenger and Courier Service	\$149.53
Travel, Meal and Related Expenses	\$2,305.53
TOTAL:	\$26,368.91

6. The expenses and charges pertaining to this case are reflected in the books and records of my firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

7. Based upon the affidavit provided by Kessler Topaz Meltzer & Check, LLP (“Kessler Topaz”) (Ex. A hereto), attorneys, summer associates, paralegals and investigators at Kessler Topaz recorded 1,621.70 hours in time from the inception of this matter through February 27, 2024, with a time value of \$895,489.00. Kessler Topaz also reported \$25,971.95 in expenses.

8. Based upon the affidavit provided by Block & Leviton LLP (“B&L”) (Ex. B hereto), attorneys, paralegals, and contract attorneys at B&L recorded 1996.60 hours in time from the inception of this matter through February 27, 2024, with a time value of \$1,056,192.00. B&L also reported \$37,230.03 in expenses. As detailed in Paragraphs 6 -7 of Exhibit B, B&L also administered the Litigation Fund that counsel for the Co-Lead Plaintiffs used to pay case-related expenses.

9. Based upon the affidavit provided by Friedman Oster & Tejtell PLLC (“FOT”) (Ex. C hereto), attorneys and contract attorneys at FOT recorded 1,269.00 hours in time from the inception of this matter through February 27, 2024, with a time value of \$722,312.50. FOT also reported \$19,479.42 in expenses.

10. Based upon the affidavit provided by RM Law, P.C. (“RM Law”) (Ex. D hereto), an attorney at RM Law recorded 65.7 hours in time from the inception of this matter through February 27, 2024, with a time value of \$65,371.50. RM Law also reported \$200.00 in expenses

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

Executed on this 11th day of June, 2024.

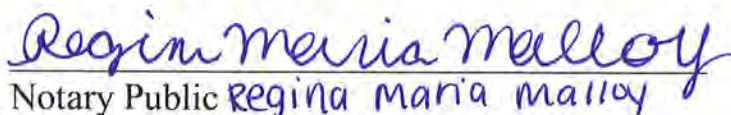
PRICKETT, JONES & ELLIOTT, P.A.



Eric J. Juray (No. 5765)
1310 N. King Street
Wilmington, Delaware 19801
(302) 888-6500

Counsel for Plaintiff Christopher Beuer

SWORN TO AND SUBSCRIBED before me,
this 11th 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, Eric J. Juray, hereby certify that on this 12th day of June, 2024, true and correct copies of the foregoing *Affidavit of Eric J. Juray in Support an Award of Attorneys' Fees and Expenses* were served by File & ServeXpress upon the following counsel of record:

MORRIS, NICHOLS, ARSHT &
TUNNELL LLP
Kevin M. Coen, Esquire
1201 N. Market Street
Wilmington, Delaware 19801

ROSS ARONSTAM & MORITZ LLP
Bradley R. Aronstam, Esquire
Michael Sirkin, Esquire
Holly Newell, Esquire
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1313 North Market Street, Suite 1001
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RICHARDS, LAYTON &
FINGER, P.A.
Blake Rohrbacher, Esquire
Morgan R. Harrison, Esquire
One Rodney Square
920 North King Street
Wilmington, Delaware 19801

/s/ Eric J. Juray
Eric J. Juray (No. 5765)