



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

DEAN WILLIAM DRULIAS and )  
MICHAEL FARZAD, Individually and )  
on Behalf of All Others Similarly )  
Situating, )

Plaintiffs, )

v. )

C.A. No. 2024-0094-LWW

APEX TECHNOLOGY SPONSOR, )  
LLC, JEFF EPSTEIN, BRAD KOENIG, )  
DAVID CHAO, PETER BELL, )  
DONNA WELLS, ALEX VIEUX and )  
STEVEN FLETCHER, )

Defendants. )

**AFFIDAVIT OF CHRISTINE M. MACKINTOSH FILED ON BEHALF OF  
GRANT & EISENHOFER P.A. IN SUPPORT OF APPLICATION FOR  
AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF DELAWARE )  
 ) ss.  
COUNTY OF NEW CASTLE )

I, Christine M. Mackintosh, being duly sworn, deposes and says:

1. I am a partner at the firm of Grant & Eisenhofer P.A. ("G&E" or the "Firm"). G&E served as counsel for plaintiffs Dean William Drulias and Michael Farzad in the above-captioned action ("Action"). I was actively involved in the prosecution of 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 submit this Affidavit in support of my Firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the Action.

3. Plaintiffs' counsel, including G&E, represented plaintiffs in this Action on a fully contingent basis. All costs and expenses in this case were borne by either G&E, Robbins Geller Rudman & Dowd LLP, or Robbins LLP.

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 maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the Action and I reviewed these reports 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, including excluding hours for timekeepers recording fewer than 5.0 total hours. 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 October 24, 2024 (the date the parties accepted the proposal to settle the Action), is 422.90 for a total lodestar of \$323,320.00. A breakdown of the Firm's hours from inception through October 24, 2024, is as follows:

NAME		HOURS	RATE	LODESTAR
Christine Mackintosh	(P)	60.40	1,100.00	\$66,440.00
Kelly Tucker	(P)	7.90	1,000.00	\$7,900.00
David Wissbroecker	(OC)	21.00	1,000.00	\$21,000.00
Jason Avellino	(A)	263.30	725.00	\$190,892.50
Jonathan Millis	(A)	39.00	650.00	\$25,350.00
Angela Petrillo	(PL)	20.20	375.00	\$7,575.00
Zachary Pfannes	(PL)	11.10	375.00	\$4,162.50
<b>Grand Total</b>		<b>422.90</b>		<b>\$323,320.00</b>

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PL) – Paralegal

6. After the reductions referred to above, the number of hours spent on the Action by the Firm from October 25, 2024, through February 7, 2025 (the date the Stipulation and Agreement of Compromise, Settlement, and Release (“Settlement Stipulation”) was filed), is 5.00 for a total lodestar of \$5,000.00. A breakdown of the Firm's hours from October 25, 2024, through February 7, 2025, is as follows:

NAME		HOURS	RATE	LODESTAR
David Wissbroecker	(OC)	5.00	1,000.00	\$5,000.00
<b>TOTAL</b>		<b>5.00</b>		<b>\$5,000.00</b>

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PL) – Paralegal

7. After the reductions referred to above, the number of hours spent on the Action by the Firm from inception through February 7, 2025 is 434.00 for a total lodestar of \$332,787.50. A breakdown of the Firm's hours from inception through February 7, 2025, is as follows:

NAME		HOURS	RATE	LODESTAR
Christine Mackintosh	(P)	61.70	1,100.00	\$67,870.00
Kelly Tucker	(P)	7.90	1,000.00	\$7,900.00
David Wissbroecker	(OC)	26.00	1,000.00	\$26,000.00
Jason Avellino	(A)	263.30	725.00	\$190,892.50
Jonathan Millis	(A)	43.50	650.00	\$28,275.00
Angela Petrillo	(PL)	20.20	375.00	\$7,575.00
Zachary Pfannes	(PL)	11.40	375.00	\$4,275.00
<b>TOTAL</b>		<b>434.00</b>		<b>\$332,787.50</b>

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PL) – Paralegal

8. The Firm also has \$26,084.36 in expenses and charges in connection with the prosecution of the Action from inception to date. The expenses and charges are summarized by category below:

CATEGORY	AMOUNT
Mediation	\$6,500.00
Case-Related Research	\$441.07
Duplication Services	\$991.90
E-Discovery Data Hosting Services	\$8,087.50
E-Discovery Data Processing Services	\$24.50
Filing Fee	\$3,249.86
Postage & Delivery	\$444.70
Service Fees	\$1,791.15
Temp Staffing	\$99.28
Travel	\$4,454.40
<b>TOTAL</b>	<b>\$26,084.36</b>

9. 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.

Dated: June 3, 2025

**GRANT & EISENHOFER P.A.**



Christine M. Mackintosh (#5085)  
123 Justison Street, 7th Floor  
Wilmington, DE 19801  
(302) 622-7000

*Attorneys for Plaintiffs*

Sworn to and subscribed to (or affirmed) before me  
this 3rd day of June 2025



Notary Public

My Commission Expires:

