



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 MICHAEL FARZAD IN SUPPORT OF
PROPOSED SETTLEMENT AND APPLICATION FOR
ATTORNEYS' FEES AND EXPENSES AND INCENTIVE AWARDS**

STATE OF CALIFORNIA)
) SS:
COUNTY OF LOS ANGELES)

I, Michael Farzad, being duly sworn, deposes and says:

1. I am a Plaintiff in the above-entitled action ("Action"). I respectfully submit this Affidavit in support of the proposed settlement of the Action and the requested fee and expense award.

2. I was the owner of shares of Apex Technology Acquisition Corporation stock, which converted to shares of AvePoint, Inc. common stock. I held such shares

continuously since before the redemption deadline, through the Merger, and own some of those same shares.

3. In connection with my role as a Plaintiff in this Action, I have monitored the work of counsel, reviewed pleadings, and regularly communicated with counsel regarding litigation strategy and significant litigation developments. In addition, prior to filing this Action, with the assistance of counsel, I conducted a Section 220 investigation.

4. I have discussed the Settlement Agreement with my counsel and accepted and authorized the Settlement Agreement because I believe that it is a fair, reasonable, and adequate compromise that is in the best interest of the Class. I believe that, balanced against the risks, duration, and uncertainty of continued litigation, the Settlement Agreement's guarantee of significant benefits to the Class is an excellent result and supports settling the Action on the agreed terms.

5. I was never offered any assurance that I would receive any compensation for bringing this Action, and the prospect of such an award was not a factor in my decision to initiate, pursue, or settle the Action. I did not commence this Action to obtain any special benefit. I have not received, been promised, or been offered—and would not and will not accept—any form of compensation, directly or indirectly, for prosecuting or serving as a representative party in this Action except: (i) such damages or other relief as the Court may award me as a member of the Class;

(ii) such fees, costs, or other payments as the Court expressly approved to be paid to me; or (iii) reimbursement, paid by my attorneys, for actual and reasonable out-of-pocket expenditures in connection with the prosecution of this Action.

6. My counsel has requested a \$2,000 Incentive Award in consideration of the time and effort I have expended on behalf of the Class.

I state under the penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct. Dated this 30 day of May, 2025.

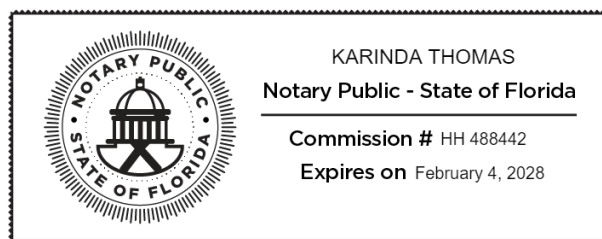
Michael Farzad

MICHAEL FARZAD

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Subscribed and sworn to (or affirmed) before me on this 30th day of May, 2025, by Michael Farzad, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature  (Seal)



Notarized remotely online using communication technology via Proof.