



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

DYLAN NEWMAN, Individually and)
on Behalf of All Others Similarly)
Situating,)
Plaintiff,)
v.) C.A. No. 2023-0538-LWW
SPORTS ENTERTAINMENT)
ACQUISITION HOLDINGS LLC,)
JOHN COLLINS, ERIC GRUBMAN,)
NATARA HOLLOWAY BRANCH,)
and TIMOTHY GOODELL,)
Defendants.)

**PLAINTIFF'S MOTION TO APPROVE THE SETTLEMENT, CERTIFY
THE CLASS, AND FOR AN AWARD OF ATTORNEYS' FEES
AND EXPENSES AND INCENTIVE AWARD**

Plaintiff Dylan Newman ("Plaintiff"), by and through his undersigned attorneys, hereby move the Court for entry of an order and final judgment granting: (i) final approval of the proposed settlement (the "Settlement") between (a) Plaintiff; and (b) defendants John Collins, Eric Grubman, Natara Holloway Branch, Timothy Goodell, and Sports Entertainment Acquisition Holdings LLC, as set forth in the Revised Stipulation and Agreement of Compromise, Settlement, and Release dated July 11, 2025; (ii) certification of the Class for Settlement purposes, pursuant to Court of Chancery Rules 23(a), 23(b)(1), and 23(b)(2); (iii) an award of attorneys' fees and expenses; and (iv) an incentive award.

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Dated: August 1, 2025

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