



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.)

**AFFIDAVIT OF ERIK W. LUEDEKE IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA :
: SS
COUNTY OF SAN DIEGO :

I, Erik W. Luedeke, being duly sworn, depose and say:

1. I am a partner of Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") and a member of good standing of the California Bar. I am submitting this Affidavit in support of an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-captioned action (the "Action").

2. Robbins Geller served as counsel to plaintiff Dylan Newman (“Plaintiff”) in this Action and took on this representation on a fully contingent basis.

3. The information in this Affidavit regarding the Firm’s time and expenses is taken from time and expense records maintained by the Firm in the ordinary course of business. I reviewed my Firm’s time and expense entries 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 for, the time and expenses committed to the litigation. As part of this review, I removed certain time entries for attorneys and paralegals who contributed *de minimus* time to this Action. I believe that the time reflected in my lodestar calculation and the expenses for which payment is sought as set forth in this Affidavit are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the Action. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the adjustments for *de minimus* timekeeper entries described above, the attorneys, paralegals, and staff at my Firm dedicated 600 hours through July 11, 2025 (the day the revised settlement stipulation was signed) to the investigation, prosecution, and resolution of this Action. The lodestar value is \$509,252.00, based on the Firm’s current hourly rates that are the usual and

customary rates charged for each individual in our cases. A breakdown of the hours and lodestar is as follows:

NAME		HOURS	RATE	LODESTAR
Baron, Randall J.	(P)	67.00	1390	\$ 93,130.00
Luedeke, Erik W.	(P)	251.50	980	246,470.00
Lyons, Christopher H.	(P)	24.40	990	24,156.00
Pintar, Theodore J.	(P)	9.00	1270	11,430.00
Bolton, Tayler D.	(A)	144.60	590	85,314.00
Park, Michaela D.	(A)	33.20	395	13,114.00
Wintemute, Lion A.	(A)	8.50	490	4,165.00
Avellino, Jason M.	(OC)	10.20	885	9,027.00
McDade, Jaime A.	(PL)	51.60	435	22,446.00
TOTAL		600.00		\$ 509,252.00

(P) Partner

(A) Associate

(OC) Of Counsel

(PL) Paralegal

5. After the adjustments for *de minimus* timekeeper entries described above, the attorneys, paralegals, and staff at my Firm dedicated 553 hours through December 6, 2024 (the day the mediator's proposal was accepted) to the investigation and prosecution of this Action. The lodestar value is \$461,323.50, based on the Firm's current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the hours and lodestar is as follows:

NAME		HOURS	RATE	LODESTAR
Baron, Randall J.	(P)	67.00	1390	\$ 93,130.00
Luedeke, Erik W.	(P)	224.40	980	219,912.00
Lyons, Christopher H.	(P)	21.60	990	21,384.00
Bolton, Tayler D.	(A)	144.60	590	85,314.00

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Park, Michaela D.	(A)	33.20	395	13,114.00
Wintemute, Lion A.	(A)	8.50	490	4,165.00
Avellino, Jason M.	(OC)	2.10	885	1,858.50
McDade, Jaime A.	(PL)	51.60	435	22,446.00
<i>TOTAL</i>		<i>553.00</i>		<i>\$ 461,323.50</i>

(P) Partner

(A) Associate

(OC) Of Counsel

(PL) Paralegal

6. A breakdown of the Firm's hours and lodestar from December 7, 2024 through July 11, 2025, is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Luedeke, Erik W.	(P)	27.10	980	\$ 26,558.00
Lyons, Christopher H.	(P)	2.80	990	2,772.00
Pintar, Theodore J.	(P)	9.00	1270	11,430.00
Avellino, Jason M.	(OC)	8.10	885	7,168.50
<i>TOTAL</i>		<i>47.00</i>		<i>\$ 47,928.50</i>

(P) Partner

(OC) Of Counsel

7. At high level, the work performed by my Firm during the period from inception through July 11, 2025 included: (i) investigating the claims underlying this Action; (ii) preparing the complaint; (iii) opposing Defendants' motion to dismiss; (iv) engaging in written discovery, including interrogatories, requests for production, third party subpoenas, and the review of document productions; and (v) undertaking work in connection with the settlement of this Action.

8. Robbins Geller seeks \$28,313.20 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing and Other Fees	\$ 450.95
Transportation, Hotels, and Meals	14,251.18
Expert (Matthew D. Cain dba Cleveland Analytics, LLC)	3,500.00
Outside Photocopies	239.14
Online Legal and Financial Research	73.44
eDiscovery Database Hosting	1,133.90
Mediation Fees (Jams Inc.)	8,654.59
AmEx Misc. Costs (Entity Search)	10.00
<i>TOTAL</i>	<i>\$ 28,313.20</i>

9. These expenses are reflected in the books and records of the Firm. These books and records are prepared from invoices, bills, expense vouchers, and check records kept in the normal course of business.

10. I respectfully request that the Court award the attorneys' fees and expenses requested for the reasons set forth in Plaintiff's Opening Brief in Support of Approval of Proposed Settlement, Class Certification, Award of Attorneys' Fees and Expenses, and Incentive Award and supporting documents.

I state under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 30, 2025



Erik W. Luedeke
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
eluedeke@rgrdlaw.com

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 30 day of July 2025 by Erik W. Luedke, proved to me on the basis of satisfactory evidence to be the person who appeared before me.




Notary Public, State of California