



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

DYLAN NEWMAN, Individually and)	
on Behalf of All Others Similarly)	
Situated,)	
)	
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 GREGORY E. DEL GAIZO IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA

: SS

COUNTY OF SAN DIEGO

I, Gregory E. Del Gaizo, being duly sworn, depose and say:

1. I am a partner of Robbins LLP ("Robbins") 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 incurred in connection with services rendered in the above-captioned action (the "Action").

2. Robbins 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 Robbins' time and expenses is taken from time and expense records maintained by my firm in the ordinary course of business. I reviewed my firm's time and expense entries in connection with 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 reasonably in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. 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 689.50 hours through July 11, 2025 (the day the revised settlement stipulation was signed) to the investigation and prosecution of this Action. The lodestar value is \$436,625, based on Robbins' 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:

TIMEKEEPER	TOTAL HOURS THROUGH 7/11/2025	RATE	TOTAL LODESTAR THROUGH 7/11/2025
Partners			
Gregory Del Gaizo	252.75	\$1,015	\$256,541.25
Associates			
Mario D. Valdovinos	235.25	\$525	\$123,506.25
Hickmon H. Friday	15.75	\$485	\$7,638.75
Paralegals			
Anna Marie Miller	51.00	\$350	\$17,850.00
Melanie P. Jones	11.50	\$285	\$3,277.50
Jorgeanne A. Cabuhat	7.50	\$350	\$2,625.00
Corporate Research¹			
Brennan P. Whalen	44.50	\$275	\$12,237.50
Chloe L. Javen	47.25	\$175	\$8,268.75
Miles F. Baird	24.00	\$195	\$4,680.00
TOTAL	689.50		\$436,625.00

5. My firm dedicated 669.50 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 \$418,153.75, based on Robbins' 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:

TIMEKEEPER	TOTAL HOURS THROUGH 12/6/2024	RATE	TOTAL LODESTAR THROUGH 12/6/2024
Partners			
Gregory Del Gaizo	235.50	\$1,015	\$239,032.50

¹ Robbins' Corporate Research department consists of a group of trained professionals dedicated to investigating corporate malfeasance. The Corporate Research team conducted factual research and investigation, including, among other things researching and identifying facts that formed the basis of the allegations.

TIMEKEEPER	TOTAL HOURS THROUGH 12/6/2024	RATE	TOTAL LODESTAR THROUGH 12/6/2024
Associates			
Mario D. Valdovinos	235.25	\$525	\$123,506.25
Hickmon H. Friday	15.75	\$485	\$7,638.75
Paralegals			
Anna Marie Miller	48.25	\$350	\$16,887.50
Melanie P. Jones	11.50	\$285	\$3,277.50
Jorgeanne A. Cabuhat	7.50	\$350	\$2,625.00
Corporate Research			
Brennan P. Whalen	44.50	\$275	\$12,237.50
Chloe L. Javen	47.25	\$175	\$8,268.75
Miles F. Baird	24.00	\$195	\$4,680.00
TOTAL	669.50		\$418,153.75

A breakdown of my firm's hours and lodestar from December 6, 2024 through July 11, 2025, is as follows:

TIMEKEEPER	TOTAL HOURS 12/6/2024 THROUGH 7/11/2025	RATE	TOTAL LODESTAR 12/6/2024 THROUGH 7/11/2025
Partners			
Gregory Del Gaizo	17.25	\$1,015	\$17,508.75
Paralegals			
Anna Marie Miller	2.75	\$350	\$962.50
TOTAL	20.00		\$18,471.25

6. At high level, the work performed by my firm during the period from inception through December 6, 2024, 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. The work performed by my firm during the period from December 7, 2024 through July 11, 2025, included undertaking work in connection with the settlement in this Action and negotiating and drafting the Stipulation and related exhibits.

7. During the course of this Action, Robbins incurred and disbursed \$22,118.89 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

ROBBINS DISBURSEMENTS	
Travel & Meals	\$9,794.52
Photocopies	\$291.00
Communications & Messaging	\$38.24
Research & Investigation	\$3,265.54
Discovery Costs	\$20.00
Filing/Service Fees	\$55.00
Mediation Fees	\$8,654.59
TOTAL	\$22,118.89

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

9. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested for the reasons set forth in Plaintiff's Opening

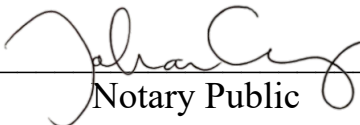
Brief in Support of Approval of Proposed Settlement, Class Certification, Award of Attorneys' Fees and Expenses, and Incentive Award and supporting documents.

Dated: July 31, 2025



Gregory E. Del Gaizo

SUBSCRIBED and SWORN to before
me this 31st day of July, 2025



Notary Public
Johanna Gomez

Print Name



My Commission Expires: 02/24/2027