



GRANTED

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

LAWRENCE BASS,

Plaintiff,

v.

C.A. No. 2022-0778-JTL

GENEVE HOLDINGS, INC., STEVEN B
LAPIN, ROY T.K. THUNG, AND TERESA
HERBERT,

Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFF’S UNOPPOSED
MOTION FOR ADMINISTRATIVE ORDER**

WHEREAS, the parties in the above-captioned action agreed to a Settlement reflected in the Stipulation and Agreement of Settlement, Compromise, and Release, dated November 27, 2024 (Trans. ID 75108191) (the “Stipulation”);

WHEREAS, the Stipulation describes a method for the distribution of the Net Settlement Fund to Eligible Class Members¹ (*see* Stipulation ¶III.3(b));

WHEREAS, the Court entered a Final Order and Judgment approving the Settlement reflected by the Stipulation on March 14, 2025 (Trans. ID 75861512);

WHEREAS, Plaintiff has filed an Unopposed Motion for Administrative Order (“Motion”), seeking: (1) authorization for A.B. Data (the Settlement Administrator) to make the Initial Distribution of the Net Settlement Fund to Eligible

¹ Unless otherwise defined herein, all capitalized terms used in this Order shall have the same meaning as set forth in the Stipulation or the Ewashko Affidavit (defined below).

Class Members of IHC; and (2) approval of payment from the Settlement Fund to the Settlement Administrator for Administrative Costs and Notice Costs;

WHEREAS, in support of Plaintiff's Motion, Plaintiff filed the Affidavit of Jack Ewashko in Support of Plaintiff's Unopposed Motion for Administrative Order ("Ewashko Affidavit"), describing: (1) the specific steps the Settlement Administrator plans to take to effect distribution of the Net Settlement Fund in the manner provided in the Stipulation, and (2) the Administrative Costs and Notice Costs that A.B. Data incurred or anticipates incurring in providing notice to the Class and administering the Settlement;

IT IS HEREBY ORDERED, this __ day of _____ 2025, that Plaintiff's Motion is GRANTED; and

1. The Settlement Administrator is directed to arrange for distribution of the Net Settlement Fund to Eligible Class Members in the manner contemplated by the Stipulation and further described in the Ewashko Affidavit.

2. Payment of approximately \$94,497.01 from the Settlement Fund to A.B. Data for Administrative Costs and Notice Costs incurred in connection with administering the Settlement is hereby authorized.

Vice Chancellor J. Travis Laster

This document constitutes a ruling of the court and should be treated as such.

Alternate Judge: Unassigned

File & Serve

Transaction ID: 76188001

Current Date: May 01, 2025

Case Number: 2022-0778-JTL

Case Name: CONF ORD - Lawrence Bass v. Geneve Holdings, Inc., et al.

Court Authorizer: J Travis Laster

/s/ Judge J Travis Laster