



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

PETER J. KREHER, on behalf of himself	)	
and all others similarly situated,	)	
	)	
Plaintiff,	)	C.A. No. 2022-0584-SG
v.	)	
	)	
ADVANT-E CORPORATION, JASON	)	
WADZINSKI, and JASON BOONE,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF PETER J. KREHER IN SUPPORT OF MOTION FOR (I) APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION, (II) CERTIFICATION OF THE SETTLEMENT CLASS, AND (III) AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND A SERVICE AWARD TO PLAINTIFF**

COMMONWEALTH OF PENNSYLVANIA )  
 ) ss:  
COUNTY OF MONTGOMERY )

Peter J. Kreher, being duly sworn, deposes and says as follows:

1. I am the Plaintiff<sup>1</sup> in the above-referenced action (the “Action”), and I make this Affidavit in support of the Motion for (I) Approval of Settlement, (II) Certification of the Settlement Class, and (III) an Award of Attorneys’ Fees,

<sup>1</sup> Unless otherwise defined, all capitalized terms have the meaning ascribed to them in the Scheduling Order, dated July 20, 2023 (Trans. ID 70439072), or the Stipulation, dated July 6, 2023 (Trans. ID 70317071).

Reimbursement of Litigation Expenses, and a Service Award to Plaintiff (the “Motion”).

2. I submit this Affidavit in full support of the Settlement and recommend that the Court approve the Settlement. I believe the \$896,973 Settlement Amount is an excellent result for the Settlement Class, defined by the Stipulation as “the non-opt-out class of record holders and beneficial owners of Advant-e common stock who were paid cash for fractional shares of Advant-e common stock as a result of the 2021 Reverse Stock Split.”<sup>2</sup> In my opinion, the Settlement is a fair, reasonable, and adequate resolution of the issues presented in this Action.

3. Although I am the Plaintiff in this litigation, I am also an attorney and admitted to the bars of the Commonwealth of Pennsylvania, the State of New York, and the District of Columbia. I have experience representing clients in securities litigations and class actions. As an attorney, I have a firm understanding of the importance of retaining competent and qualified counsel to represent a proposed

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<sup>2</sup> Stipulation ¶ 1.56. Excluded from the Settlement Class are “(i) Defendants; (ii) current and former employees, executives, and directors of Advant-e (“Excluded D&Os”), except for one Advant-e employee who Defendants represent is a programmer and had no involvement in the reverse stock split (the “Included Employee”); and (iii) members of Defendants’ and the Excluded D&Os’ immediate families, legal representatives, heirs, successors or assigns and any entity in which Defendants or the Excluded D&Os have or had a controlling interest (each person or entity listed by romanette in this Paragraph 1.56 except for the Included Employee, an “Excluded Person”). For the avoidance of doubt, the Included Employee is a member of the Settlement Class and is not an Excluded D&O or Excluded Person.” *Id.*

class in a stockholder class action, and the need to supervise counsel to ensure the litigation is prosecuted properly and efficiently. I retained Wolf Popper LLP and Cooch and Taylor, P.A. because of the firms' significant experience successfully prosecuting securities and stockholder class action litigation, including in this Court.

4. I was very involved in the supervision of this litigation and of counsel. During the pendency of the litigation, I had monthly video calls with my counsel at Wolf Popper to discuss the status of the litigation and litigation strategy. I also had discussions with my counsel via email, telephone, and video conference outside those monthly calls, where we discussed, among other things, litigation strategy, potential damages, and settlement negotiation strategy.

5. I reviewed a draft of the Complaint filed in this action and provided comments and edits. I also reviewed the final draft and authorized its filing, as stated in my Verification and Affidavit, dated June 28, 2022. I also reviewed a copy of the Defendants Answer after it was filed. I discussed with counsel and provided comments on a request to Defendants for production of documents and information. I also reviewed documents produced by the Defendants, including the valuation performed by a third party in connection with the 2021 Reverse Stock Split.

6. My counsel kept me apprised of the settlement negotiations, and I approved the agreement to settle this matter for \$896,973, or \$1.75 per share cashed out in the 2021 Reverse Stock Split. Based on my understanding of the potential

litigation risks and benefits, I think this result is reasonable, fair, and adequate for the Settlement Class, and represents an excellent result given it is a 33% increase in the consideration received by Settlement Class Members.

7. I estimate that I spent a total of 15 hours investigating potential claims, meeting with counsel, supervising counsel, and engaging in the activities described herein.

8. I have reviewed and I support my counsel's request for an award of attorneys' fees of 15% of the Settlement Amount, or \$134,545, and reimbursement of litigation expenses of \$19,922.64. Plaintiff's counsel, through their diligent efforts, achieved a great result for the Settlement Class and deserve compensation. In light of the benefits achieved in the Action, I believe that their requests are fair and reasonable.

9. I also request that the Court award me a \$1,000 Plaintiff Service Award for my work on behalf of the Settlement Class and to reimburse me for the time I spent working on the litigation. I believe this amount to be reasonable and appropriate related to the total Settlement Amount. I also request that the Plaintiff Service Award be paid from any Fee and Expense Award granted to my counsel, so that it does not reduce the value of the Net Settlement Fund for the Settlement Class.

10. My support for the settlement is not contingent on me receiving a Plaintiff Service Award. I understand I will receive no compensation if the

Settlement is not approved by the Court. I understand that I will receive only my *pro rata* share of the Net Settlement Fund if the Settlement is approved by the Court but the Plaintiff Service Award is not approved by the Court.

11. I have not received, been promised or offered and will not accept any form of compensation, directly or indirectly, for prosecuting or serving as a representative party in the Action, except for (a) such damages or other relief as the Court may award me as a member of the Settlement Class; (b) such fees, costs, or other payments as the Court expressly approves to be paid to me, including the Plaintiff Service Award; or (c) reimbursement, paid by plaintiff's counsel, of actual and reasonable out-of-pocket expenses incurred by me directly in connection with prosecution of the Action.

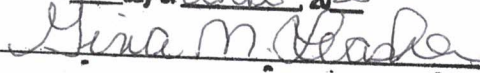


Peter J. Kreher

Sworn before me this  
10<sup>th</sup> day of October, 2023

State of Pennsylvania  
County of Montgomery

Subscribed and sworn to before me this  
10<sup>th</sup> day of October, 2023



Commonwealth of Pennsylvania - Notary Seal  
GINA M LEASHER, Notary Public  
Montgomery County  
My Commission Expires April 12, 2027  
Commission Number 1093467