



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

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

**AFFIDAVIT OF LANCE CAVALLO REGARDING (A) MAILING OF THE
POSTCARD NOTICE; (B) PUBLICATION OF THE SUMMARY NOTICE;
(C) ESTABLISHMENT OF THE TELEPHONE HOTLINE; AND
(D) ESTABLISHMENT OF THE SETTLEMENT WEBSITE**

STATE OF NEW YORK)
) SS.:
COUNTY OF NASSAU)

I, Lance Cavallo, do hereby state as follows:

1. I am a Vice President of Class Actions at KCC, LLC (“KCC”). My business address is 1 McInnis Parkway, Suite 250, San Rafael, CA 94903. I am familiar with, and have personal knowledge of, the matters stated in this declaration and am competent to testify about them if called upon to do so.

2. KCC was approved by the Court to serve as the Settlement Administrator¹ in connection with the proposed Settlement of the above-captioned

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Scheduling Order, dated July 20, 2023, and/or the Stipulation and Agreement of Settlement, dated July 6, 2023.

Action and to, among other things, effect the mailing, publication, and distribution of the Notices to members of the Settlement Class, which is 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.”²

MAILING OF NOTICE

3. In accordance with the Stipulation and Scheduling Order, KCC and Plaintiff’s Counsel received from Defendants’ Counsel a list of 36 names and addresses of record holders of Advant-e common stock at the time of the 2021 Reverse Stock Split, including Cede & Co. (the registered holder for the Depository Trust Corporation (“DTC”)), Defendant Jason Wadzinski (who is excluded from the Settlement), and one stockholder who was listed twice at the same address.

4. On August 4, 2023, KCC mailed copies of the Postcard Notice of Pendency of Stockholder Class Action and Proposed Settlement, Settlement Hearing, and Right to Appear (“Postcard Notice”) by United States mail, first class,

² 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.*

postage prepaid to each of the 34 unique record holders other than Defendant Wadzinski (*i.e.* potential Settlement Class Members). A sample of the Postcard Notice is attached hereto as Exhibit A.

5. As in most class actions of this nature, a large majority of potential Settlement Class Members are beneficial owners of the shares of a company's common stock whose securities are held in "street name" – *i.e.*, the securities are purchased by brokerage firms, banks, institutions and other third-party nominees in the name of the nominee, on behalf of the beneficial purchasers. KCC and Plaintiff's Counsel received from Defendants Counsel a list of 22 unique DTC participants (*i.e.* brokers and other nominees) that held Advant-e common stock for their beneficial owner customers.

6. KCC maintains a proprietary database with names and addresses of the largest and most common U.S. banks, brokerage firms, and nominees, including national and regional offices of certain nominees (the "Nominee Database"). KCC's Nominee Database is updated from time to time as new nominees are identified, and others go out of business. On August 4, 2023, KCC caused Postcard Notice to be mailed to the 22 DTC participants at the addresses reflected in KCC's Nominee Database or at the address on the list provided by Defendants' Counsel. If KCC had multiple addresses for a DTC participant, it mailed a copy of the Postcard Notice to

each of those addresses. In addition, KCC mailed the Postcard Notice to Broadridge. In total, KCC mailed 30 Postcard Notices to the 22 DTC participants and Broadridge

7. The Postcard Notice requested those who held shares of the common stock of Advant-e on behalf of a Settlement Class Member to promptly send the Postcard Notice to all of their respective beneficial owners. If additional copies of the Postcard Notice were needed for forwarding to such beneficial owners, any requests for such additional copies or provision of a list of names and mailing addresses of beneficial owners could be made to the Settlement Administrator. If the broker or nominee chose the latter option, KCC caused the Postcard Notice to be mailed promptly to said beneficial owners.

8. As of October 6, 2023, KCC has received requests from brokers and other nominees for 130 Postcard Notices to be sent to such brokers and nominees so that they could forward them to their customers. All such requests were promptly fulfilled. Brokers and nominees did not provide any names and addresses of beneficial owners for KCC to mail Postcard Notices directly.

9. As a result of the efforts described above, as of October 6, 2023, KCC has mailed or distributed a total of 194 Postcard Notices, including the 130 Postcard Notices provided to brokers and nominees in response to their requests.

10. KCC also provided a copy of the Notice of Pendency of Stockholder Class Action and Proposed Settlement, Settlement Hearing, and Right to Appear

(“Long-Form Notice”) to the DTC for posting on its Legal Notice System (“LENS”). A copy of the Long-Form Notice is attached hereto as Exhibit B. The LENS may be accessed by any broker or other nominee that participates in DTC’s security settlement system. The Long-Form Notice was posted on DTC’s LENS on August 4, 2023.

SUMMARY NOTICE

11. On August 11, 2023, KCC caused the Summary Notice of Pendency of Stockholder Class Action and Proposed Settlement, Settlement Hearing, and Right to Appear (“Summary Notice”) to be transmitted and published over PR Newswire. A copy of the Summary Notice is attached hereto as Exhibit C.

TELEPHONE HOTLINE

12. Beginning on August 4, 2023, KCC established and continues to maintain a toll-free telephone number (1-855-658-3943) to accommodate potential Settlement Class Members with questions about the Settlement. The telephone hotline connects potential Settlement Class Members to a live operator on weekdays between 8am and 8pm ET. As of October 6, 2023, the telephone hotline received a total of 6 calls from potential Settlement Class Members. If the call was received at a time when a live operator was not available, then the call was promptly returned once a live operator was available.


WEBSITE

13. In coordination with Class Counsel, KCC designed and implemented a website, www.AdvantEStockholderSettlement.com, dedicated to the Settlement to assist potential Settlement Class Members. The website was operational beginning on August 4, 2023, and is accessible 24 hours a day, 7 days a week. The website includes the Long-Form Notice, Postcard Notice, Summary Notice, and relevant Court Documents, including the Stipulation and Scheduling Order, all of which shareholders may download. The website also contains contact information for KCC. As of October 6, 2023, the website has been visited 331 times from 221 unique visitors. In addition, the Long-Form Notice has been downloaded 29 times.

NO OBJECTIONS RECEIVED

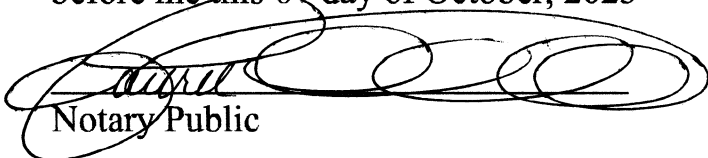
14. As of October 6, 2023, KCC has no received any objections to the Settlement, the Plan of Allocation, the Fee and Expense Application, or the requested Plaintiff Service Award.

I declare under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct.



Lanee Cavallo

SWORN TO AND SUBSCRIBED
before me this 6th day of October, 2023


Notary Public

LAURIE ANN WAGONFIELD
NOTARY PUBLIC - STATE OF NEW YORK
No. 01WA6396360
Qualified in Nassau County
Commission Expires August 19, 2027



Exhibit A

**Court-Ordered Legal Notice of Pendency of
Stockholder Class Action and Proposed Settlement,
Settlement Hearing, and Right to Appear**

Court of Chancery of the State of Delaware

Kreher v. Advant-e Corporation, et al., C.A. No. 2022-0584-SG

This Postcard Notice may affect your legal rights.

Please read it carefully.

Important Legal Notice Authorized by the Delaware Court of Chancery about a Stockholder Class Action.

This Notice is directed to record holders and beneficial owners of Advant-e Corporation (“Advant-e”) common stock who were paid cash for fractional shares of Advant-e common stock as a result of the 1 for 20,000 reverse stock split of Advant-e common stock that took place in December 2021.

Capitalized terms used in this notice that are not otherwise defined are defined in the Stipulation of Settlement, available at www.AdvantEStockholderSettlement.com.

Notice to Persons or Entities Holding Record Ownership on Behalf of Others. Brokerage firms, banks, or other persons or entities that held shares of Advant-e common stock on behalf of Settlement Class Members are requested to promptly send this Postcard Notice to all of their respective beneficial owners of Advant-e common stock. If additional copies of the Postcard Notice are needed for forwarding to such beneficial owners, any requests for such copies may be made to the Settlement Administrator at the address on the front of this Postcard Notice. You may be entitled to reimbursement for your actual costs, as set forth in the Long-Form Notice.

ADVT

Advant-e Stockholder Settlement
c/o KCC Class Action Services
P.O. Box 6162
Novato, CA 94948-6162



VISIT THE SETTLEMENT
WEBSITE BY SCANNING
THE PROVIDED QR CODE

Why Did I Receive This Notice? The Parties to the above-captioned stockholder class action (“Action”) pending in the Court of Chancery of the State of Delaware (“Court”) have, following arm’s length negotiations, reached a proposed settlement of the Action (“Settlement”) on the terms and conditions set forth in the Stipulation and Agreement of Settlement, dated July 6, 2023 (“Stipulation”). This Postcard Notice advises potential Settlement Class Members of information about the Action and the proposed Settlement. The Stipulation and Long-Form Notice are available for download from www.AdvantEStockholderSettlement.com (“Settlement Website”), or by contacting the Settlement Administrator at the contact information on the front of this Postcard Notice.

What Is The Case About? Plaintiff alleges, on behalf of himself and a purported class of Advant-e common stockholders who were paid \$5.25 per share cash, on a pre-split basis, for fractional shares of Advant-e common stock that resulted from the 1 for 20,000 reverse stock split of Advant-e common stock that took place in December 2021 (“2021 Reverse Stock Split”), that Jason Wadzinski and Jason Boone breached their fiduciary duties to the Settlement Class by, among other things, paying an unfair price for fractional shares that resulted from the 2021 Reverse Stock Split and failing to condition the 2021 Reverse Stock Split on approval by an independent special committee of Advant-e’s Board of Directors and a fully informed vote of a majority of the minority stockholders of Advant-e. Defendants deny all allegations of wrongdoing and liability in Plaintiff’s complaint.

Who Is Included In The Settlement Class? The Settlement Class includes all 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. As set forth in the Stipulation and Long-Form Notice, Defendants, their families, and certain current and former employees of Advant-e and other entities, are excluded from the Settlement Class by definition.

What Is The Proposed Settlement? Pursuant to the proposed Settlement, the Defendants will pay \$896,973 to settle the action, which represents \$1.75 for each share of Advant-e common stock, on a pre-split basis, that was owned by a Settlement Class Member and was cashed out as a result of the 2021 Reverse Stock Split (“Settlement Amount”). In exchange for the Settlement Amount, Settlement Class Members will release the Released Plaintiff Claims against the Released Defendant Persons. For all details of the Settlement and the releases, read the Stipulation and Long-Form Notice, available at the Settlement Website.

When And Where Will The Court Decide Whether To Approve The Settlement? A Settlement Hearing will be held before the Court on Wednesday, November 8, 2023, at 1:00 p.m., at the Court of Chancery Courthouse, 34 The Circle, Georgetown, DE 19947. At the Settlement Hearing, the Court will, among other things: determine whether to finally certify this Action as a non-opt-out class action; determine whether the proposed Settlement is fair, reasonable and adequate to the Settlement Class, and should be approved; determine whether to approve the Fee and Expense Application for attorneys’ fees not to exceed 15% of the Settlement, or \$134,545, reimbursement of litigation expenses not to exceed \$25,000, and a Service Award to Plaintiff not to exceed \$1,000; and hear and consider any objections to the Settlement or the Fee and Expense Application. Any objections must be filed with the Register in Chancery and delivered to counsel for the parties such that they are received no later than October 25, 2023, in accordance with the instructions in the Long-Form Notice. The Court may change the date or time of the Settlement Hearing without further notice to the Settlement Class. Please check the Settlement Website for any changes to the Settlement Hearing.

How Will Settlement Class Members Receive Payment From The Settlement? If the Settlement is approved by the Court and the Effective Date (as defined in the Stipulation) occurs, the Net Settlement Fund will be distributed to Settlement Class Members on a pro rata basis in the same manner in which Settlement Class Members received their 2021 Reverse Stock Split Cash Payment. Settlement Class Members do not need to submit a claim form to receive payment. Please refer to the Long-Form Notice and Stipulation for more detailed information regarding the distribution of the Net Settlement Fund to Settlement Class Members.

Whom Should I Contact If I Have Questions? You may contact the Settlement Administrator at the contact information on the front of this Postcard Notice or the following Plaintiff’s Counsel with any questions: Joshua Ruthizer, Wolf Popper LLP, 845 Third Avenue, New York, NY, 10022, 1-877-370-7703.

Do Not Call Or Write The Court Or The Office Of The Register In Chancery Regarding This Notice.

Exhibit B

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.)	
)	

**NOTICE OF PENDENCY OF STOCKHOLDER
CLASS ACTION AND PROPOSED SETTLEMENT,
SETTLEMENT HEARING, AND RIGHT TO APPEAR**

TO: ALL RECORD HOLDERS AND BENEFICIAL OWNERS OF ADVANT-E CORPORATION COMMON STOCK WHO WERE PAID CASH FOR FRACTIONAL SHARES OF ADVANT-E COMMON STOCK AS A RESULT OF THE 1 FOR 20,000 REVERSE STOCK SPLIT OF COMMON STOCK OF ADVANT-E THAT TOOK PLACE IN DECEMBER 2021.

PLEASE READ ALL OF THIS LONG-FORM NOTICE CAREFULLY. YOUR RIGHTS WILL BE AFFECTED BY THE LEGAL PROCEEDINGS IN THIS ACTION.

THIS LONG-FORM NOTICE RELATES TO THE PROPOSED SETTLEMENT OF A CLASS ACTION LAWSUIT AND CONTAINS IMPORTANT INFORMATION. IF THE COURT APPROVES THE PROPOSED SETTLEMENT, YOU WILL BE FOREVER BARRED FROM CONTESTING THE FAIRNESS OF THE PROPOSED SETTLEMENT OR PURSUING THE RELEASED PLAINTIFF CLAIMS (AS DEFINED BELOW).

I. THE PURPOSE OF THIS LONG-FORM NOTICE

The purpose of this Long-Form Notice is to inform you of this lawsuit, *Kreher v. Advant-e Corp., Jason Wadzinski, and Jason Boone*, C.A. No. 2022-0584-SG (the “Action”), a proposed settlement of the Action, and a hearing to be held by the Court of Chancery of the State of Delaware.

The terms of the Settlement are stated in the Stipulation¹ between Plaintiff and Defendants, and provide for a cash payment for the benefit of the Settlement Class of \$896,973 (the “Settlement Amount”), which amounts to \$1.75 per share, on a pre-split basis, for each share of Advant-e common stock owned by a Settlement Class Member that was cashed out as a result of the 1 for 20,000 reverse stock split of Advant-e common stock that took place in December 2021 (the “2021 Reverse Stock Split”). The Settlement Class, as defined in the Stipulation is:

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, excluding: (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 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.

¹ Capitalized terms not defined in this Long-Form Notice have the meaning set forth in the Stipulation and Agreement of Settlement, dated July 6, 2023 (the “Stipulation”), which is publicly available from the Settlement Website, the Settlement Administrator, or the Register in Chancery as indicated herein.

The hearing will be held at the Court of Chancery Courthouse, 34 The Circle, Georgetown, Delaware 19947, on Wednesday, November 8, 2023, at 1:00 p.m. (the "Settlement Hearing").

At the Settlement Hearing, the Court will be asked:

a. to determine whether to finally certify the Action as a non-opt-out class action on behalf of the Settlement Class (as defined in the Stipulation as stated herein) and appoint Plaintiff as Class Representative and Plaintiff's Counsel as Class Counsel;

b. to determine whether the Settlement, as provided for in the Stipulation, is fair, reasonable, adequate, and in the best interests of the Settlement Class, and should be approved by the Court;

c. to finally confirm that the form and content of the Notices and mailing and distribution of the Notices met the requirements of Delaware Court of Chancery Rule 23 and due process;

d. to determine whether a Judgment substantially in the form attached as Exhibit E to the Stipulation should be entered dismissing the Action with prejudice and releasing the Released Plaintiff Claims and Released Defendant Claims;

e. to hear and rule on any objections to the Settlement or the Fee and Expense Application;

f. to determine whether to approve the Fee and Expense Application for an award of attorneys' fees to Plaintiff's Counsel not to exceed 15% of the Settlement Fund, or \$134,545, reimbursement to Plaintiff's Counsel of litigation expenses not to exceed \$25,000, and an award of a Service Award to the Plaintiff not to exceed \$1,000; and

g. to consider any other matters that may properly be brought before the Court in connection with the Stipulation.

This Long-Form Notice describes the rights that Settlement Class Members have under the Settlement and what steps Settlement Class Members may, but are not required to, take in relation to the Settlement. If the Court approves the Settlement, the Parties will ask the Court at the Settlement Hearing to enter an Order and Final Judgment dismissing the Action with prejudice on the merits. If you are a Settlement Class Member, you will be bound by any judgment entered in the Action, whether or not you actually receive this Long-Form Notice. You may not opt out of the Settlement Class.

II. BACKGROUND OF THE ACTION

THE FOLLOWING RECITATION DOES NOT CONSTITUTE FINDINGS OF THE COURT. IT IS BASED ON STATEMENTS OF THE PARTIES AND SHOULD NOT BE UNDERSTOOD AS AN EXPRESSION OF ANY OPINION OF THE COURT AS TO THE MERITS OF ANY OF THE CLAIMS OR DEFENSES RAISED BY ANY OF THE PARTIES.

On December 15, 2021, Defendant Advant-e effectuated a 1 for 20,000 reverse stock split of common stock of Advant-e (the 2021 Reverse Stock Split). The 2021 Reverse Stock Split was approved through written consent of Defendants Wadzinski and Boone. Defendant Wadzinski owned more than 50% of the outstanding shares of Advant-e common stock at the time and was able to approve the 2021 Reverse Stock Split through the written consent of his shares. The 2021 Reverse Stock Split was not subject to approval by a vote of the minority stockholders of Advant-e or those stockholders who would have their Advant-e common stock cashed out as a result of the 2021 Reverse Stock Split.

Any fractional shares that resulted from the 2021 Reverse Stock Split resulted in a cash payment in lieu of fractional shares at the price of \$5.25 per share on a pre-split basis (the "2021 Reverse Stock Split Cash Payment").

On July 1, 2022, Plaintiff, on behalf of himself and all others similarly situated, filed his Verified Class Action Complaint challenging the 2021 Reverse Stock Split (the "Complaint"). Plaintiff alleged in the Complaint, among other things, that Defendants breached their fiduciary duties to the stockholders of Advant-e whose shares were cashed out in the 2021 Reverse Stock Split because the \$5.25 per share price for fractional shares that result from the 2021 Reverse Stock Split was unfair, and the 2021 Reverse Stock Split

was approved and effected through an unfair process without approval by an independent special committee of the Board of Directors of Advant-e and a majority vote of Advant-e minority stockholders.

Following the filing of the Complaint, Plaintiff and Defendants entered into a Confidentiality Stipulation, which was granted by the Court on September 19, 2022, after which Defendants produced to Plaintiff the non-public valuation report prepared in connection with the 2021 Reverse Stock Split.

After receiving and reviewing the valuation report, Plaintiff's Counsel requested 16 additional categories of documents from Defendants, and Defendants produced the responsive documents on October 10, 2022, comprising approximately 500 pages of mostly non-public documents, including financial documents, documents related to the 2021 Reverse Stock Split, drafts of the valuation report, and other relevant documents.

Plaintiff and Plaintiff's Counsel assert that they reviewed the documents produced by Defendants and other publicly available information concerning Advant-e. Plaintiff's Counsel asserts that they consulted with a valuation expert concerning fair value of Advant-e and the cashed-out minority stock at the time of the 2021 Reverse Stock Split Effective Date, and potential damages to the Settlement Class.

Plaintiff and Defendants, through their counsel, then engaged in arm's-length negotiations in an attempt to resolve the Action, culminating in the agreement on the terms of a proposed settlement between Plaintiff and Defendants. As a result of these negotiations, the Parties have agreed to settle the Litigation and provide the Releases in return for a cash payment on behalf of Defendants of \$896,973 (the "Settlement Amount") for the benefit of the Settlement Class. Defendants produced information to evidence that the Settlement Class owned, collectively, 512,556 shares of Advant-e common stock that were cashed out in the 2021 Reverse Stock Split. The Settlement Amount represents \$1.75, on a pre-split basis, for each Advant-e share, on a pre-split basis, owned by a Settlement Class Member that was cashed out in the 2021 Reverse Stock Split.

Plaintiff and Plaintiff's Counsel believe the Action has merit, and Plaintiff's entry into this Stipulation and Settlement is not intended to be and shall not be construed as an admission or concession concerning the relative strength or merit of the claims alleged in this Action.

Defendants have denied, and continue to deny, any and all allegations of wrongdoing or liability asserted in the Action, including without limitation, that any of the Defendants breached their fiduciary duties in connection with the 2021 Reverse Stock Split. Defendants are entering into this Stipulation solely to eliminate the uncertainty, distraction, burden, risk, and expense of further litigation.

THE SETTLEMENT OF THIS ACTION, IF APPROVED BY THE COURT ON THE TERMS AND CONDITIONS SET FORTH IN THE STIPULATION, WILL INCLUDE, BUT NOT BE LIMITED TO, A RELEASE OF ALL CLAIMS ASSERTED IN OR RELATED TO THE ACTION.

THE COURT HAS NOT FINALLY DETERMINED THE MERITS OF THE CLAIMS MADE BY PLAINTIFF AGAINST, OR THE DEFENSES OF, THE DEFENDANTS. THIS LONG-FORM NOTICE DOES NOT IMPLY THAT THERE HAS BEEN OR WOULD BE ANY FINDING OF VIOLATION OF THE LAW OR THAT RELIEF IN ANY FORM OR RECOVERY IN ANY AMOUNT COULD BE HAD IF THE ACTION WAS NOT SETTLED.

III. THE SETTLEMENT CONSIDERATION

In consideration for the full and final release, settlement and discharge of any and all Released Plaintiff Claims against the Released Defendant Persons, the Defendants agreed to pay the \$896,973 Settlement Amount for the benefit of the Settlement Class. The Settlement Amount represents \$1.75 for each Advant-e share, on a pre-split basis, owned by a Settlement Class Member that was cashed out in the 2021 Reverse Stock Split.

Following the Effective Date, the Net Settlement Fund will be disbursed by the Settlement Administrator according to the Plan of Allocation, provided the Plan of Allocation and the Settlement is approved by the Court. The Net Settlement Fund is the Settlement Amount plus interest, minus (i) any Taxes and Tax Expenses; (ii) any Notice and Administration Costs; (iii) any Fee and Expense Award awarded and Service Award awarded by the Court; and (iv) any other costs or fees approved by the Court.

Pursuant to the proposed Plan of Allocation and the Stipulation, the Net Settlement Fund will be distributed to Settlement Class Members on a *pro rata* basis, based upon the number of shares that each Settlement Class Member had cashed out for \$5.25 per share, on a pre-split basis, in the 2021 Reverse Stock Split.

For more information on the Plan of Allocation, please see the Stipulation, which is available from the Settlement Website, www.AdvantEStockholderSettlement.com, or by making a request to the Settlement Administrator at:

Advant-e Stockholder Settlement
c/o KCC Class Action Services
P.O. Box 6162, Novato, CA 94948-6162
Toll-Free Number: 1-855-658-3943
Website: www.AdvantEStockholderSettlement.com
Email: info@AdvantEStockholderSettlement.com

Please note that there is no “claim form” for Settlement Class Members to submit in order to be entitled to payment under the Plan of Allocation. Rather, payment will be made to Settlement Class Members in the same manner in which Settlement Class Members received their 2021 Reverse Stock Split Cash Payment based on the information provided by Defendants, their agents, and the Depository Trust Company (“DTC”). Defendants have agreed to cooperate with Plaintiff and the Settlement Administrator in providing Notice to the Settlement Class, including, but not limited to, providing contact and shareholding information of Settlement Class Members to the extent available to Defendants. Defendants have also agreed to provide information to Plaintiff concerning the number of shares held by the Defendants and other Excluded Persons and where and how the shares were held to ensure no Excluded Person is paid any of the Net Settlement Fund.

Payments will be made only if the Court approves the Settlement and after any appeals are resolved. Please be patient. Any balance which still remains in the Net Settlement Fund after the Settlement Administrator has made good faith efforts to distribute it to Settlement Class Members shall escheat to the State of Delaware.

The Notice and Administration Costs, any Taxes and Tax Expenses for the Settlement Fund, expenses of the Settlement Administrator, and other costs and expenses of the administration and distribution of the Settlement Amount (including the costs, if any, associated with escheat) will be borne by the Settlement Class and funded out of the Settlement Fund. The Stipulation permits Plaintiff and Plaintiff’s counsel to pay up to \$75,000 from the Settlement Fund to the Settlement Administrator for Notice and Administration Costs without further order of the Court. Any amounts in excess of \$75,000 to be paid to the Settlement Administrator will require approval of the Court.

IV. DISMISSAL AND RELEASES

Subject to final approval of the Settlement by the Court, pursuant to Delaware Court of Chancery Rule 23, the Released Plaintiff Claims (as defined below) will be finally and fully compromised, settled, released, discharged, and dismissed with prejudice as against the Released Defendant Persons (as defined below), and the Released Defendant Claims (as defined below) will be finally and fully compromised, settled, released, discharged, and dismissed with prejudice as against the Released Plaintiff Persons, (as defined below), including Settlement Class Members.

“Claims” means all claims and causes of action, rights, liabilities, suits, debts, obligations, demands, damages, losses, costs, expenses, judgments, executions, matters, issues of every nature and description whatsoever, including Unknown Claims, whether arising under federal law, state law, statutory law, common law, foreign law, or any other law, rule or regulation.

“Released Defendant Claims” means all Claims that could have been asserted in the Litigation against the Released Plaintiff Persons, which arise out of the institution, prosecution, settlement or dismissal of the Action, provided, however, that the Released Defendant Claims shall not include claims to enforce the Settlement.

“Released Plaintiff Claims” means all Claims that were alleged, asserted, set forth, or claimed in the Complaint or could have been alleged, asserted, set forth, or claimed in the Complaint or in any other court, tribunal, or proceeding by Plaintiff or any other member of the Settlement Class, individually, or as a member of the Settlement Class directly in their capacities as current or former Advant-e stockholders, against Defendants, in each case arising out of, based on, or relating to the allegations, transactions, facts, events, matters, occurrences, representations, or omissions involved, set forth, or referred to in the Complaint, including without limitation all such claims relating to (i) the 2021 Reverse Stock Split and the process of effecting the 2021 Reverse Stock Split; (ii) the consideration received by Plaintiff and/or the Settlement Class in connection with the 2021 Reverse Stock Split; and (iii) any fiduciary obligations of Defendants relating to the 2021 Reverse Stock Split, the process of deliberation leading to the 2021 Reverse Stock Split, the disclosures respecting the 2021 Reverse Stock Split, or the consideration received by Plaintiff and/or the Settlement Class in connection with the 2021 Reverse Stock Split, provided, however, that the Released Plaintiff Claims shall not include claims to enforce the Settlement.

“Released Plaintiff Persons” means Plaintiff and all other Settlement Class Members and their heirs, estates, executors, trustees, successors and assigns, and Plaintiff’s Counsel.

“Released Defendant Persons” means all Defendants and/or their respective controlling persons and/or their respective families, parent entities, associates, affiliates, or subsidiaries, and each and all of their respective past, present, or future officers, directors, stockholders, agents, representatives, employees, attorneys, financial or investment advisors or investment bankers, other advisors, consultants, accountants, commercial bankers, financing bank or lenders, trustees, engineers, insurers, co-insurers and reinsurers, heirs, executors, trustees, general or limited partners or partnerships, limited liability companies, members, heirs, executors, personal or legal representatives, estates, administrators, predecessors, successors, and assigns, and any of their affiliates, parents, and subsidiaries and their respective control persons, directors, officers, employees, and agents of each and any of them, whether or not any such person or entity was served or appeared in the Litigation.

“Unknown Claims” means, as appropriate, (i) any Released Plaintiff Claims that any Plaintiff or any other Settlement Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Persons, which, if known by him, her, or it, might have affected his, her, or its decision(s) with respect to the Settlement, or (ii) any Released Defendant Claims that any Defendant does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Plaintiff Persons, which, if known by him, her, or it, might have affected his, her, or its decision(s) with respect to the Settlement. With respect to any and all Released Plaintiff Claims and Released Defendant Claims, the Parties stipulate and agree that Plaintiff and Defendants shall expressly waive, and each of the other Settlement Class Members by operation of law shall be deemed to have waived, any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States or other jurisdiction, or principle of common law or foreign law, which is similar, comparable, or equivalent to Cal. Civ. Code § 1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Plaintiff and Defendants acknowledge, and each of the other Settlement Class Members by operation of law are deemed to acknowledge, that they may discover facts in addition to or different from those now known or believed to be true with respect to the Released Plaintiff Claims and the Released Defendant Claims, but that it is the intention of Plaintiff and Defendants, and by operation of law the other Settlement Class Members, to completely, fully, finally, and forever extinguish any and all Released Plaintiff Claims and Released Defendant Claims, known or unknown, suspected or unsuspected, which now exist, or heretofore existed, or may hereafter exist, and without regard to the subsequent discovery of additional or different facts. Plaintiff and Defendants also acknowledge, and each of the other Settlement Class Members by operation of law are deemed to acknowledge, that the inclusion of “Unknown Claims” in the definition of Released Plaintiff Claims and Released Defendant Claims is separately bargained for and is a key element of the Settlement.

FOR A FULL DESCRIPTION OF THE RELEASES, PLEASE REVIEW THE STIPULATION.

V. REASONS FOR THE SETTLEMENT

Plaintiff's Counsel investigated and reviewed discovery relating to the claims and the underlying events alleged in the Action. Plaintiff's Counsel have analyzed the evidence adduced during their investigation and through discovery, and have researched the applicable law with respect to Plaintiff and the Settlement Class. In negotiating and evaluating the terms of this Stipulation, Plaintiff's Counsel considered the significant legal and factual defenses to Plaintiff's claims. Plaintiff's Counsel have received sufficient information to evaluate the merits of this Settlement. Based on their evaluation, Plaintiff's Counsel believed in executing the Stipulation and that its provisions were fair, reasonable and adequate and in the best interests of all Settlement Class Members and that they conferred substantial benefits upon Settlement Class Members now, and avoids the time, expense, and uncertainty of a trial. At the Settlement Hearing, the Court will determine whether the Settlement should be approved as fair, reasonable and adequate.

The Defendants deny any and all allegations of wrongdoing, fault, liability or damage whatsoever; deny that they engaged in, committed or aided or abetted the commission of any breach of duty, wrongdoing or violation of law; deny that Plaintiff or any of the other Settlement Class Members suffered any damage whatsoever; deny that they acted improperly in any way; believe that they acted properly at all times; maintain that the Individual Defendants complied with their fiduciary duties; and maintain that they have committed no other breach of duty or wrongdoing whatsoever. The Defendants entered into the Stipulation solely because they consider it desirable that the Action be settled and dismissed with prejudice in order to, among other things, eliminate the uncertainties, burden and expense of further litigation and finally put to rest and terminate all of the claims which were or could have been asserted against the Parties in the Action.

VI. THE SETTLEMENT HEARING

The Court has scheduled a Settlement Hearing, which will be held on Wednesday, November 8, 2023, at 1:00 p.m., at the Court of Chancery Courthouse, 34 The Circle, Georgetown, Delaware 19947, to review the proposed Settlement and consider the entry of an Order and Final Judgment proposed by the Parties. At the hearing, the Court will, among other things, (a) determine whether to finally certify the Action as a non-opt-out class action on behalf of the Settlement Class and appoint Plaintiff as Class Representative and Plaintiff's Counsel as Class Counsel; (b) determine whether the Settlement, as provided for in the Stipulation, is fair, reasonable, adequate, and in the best interests of the Settlement Class, and should be approved by the Court; (c) finally confirm that the form and content of the Notices and mailing and distribution of the Notices met the requirements of Delaware Court of Chancery Rule 23 and due process; (d) determine whether a Judgment substantially in the form attached as Exhibit E to the Stipulation should be entered dismissing the Action with prejudice and releasing the Released Plaintiff Claims and Released Defendants' Claims; (e) hear and rule on any objections to the Settlement or the Fee and Expense Application; (f) determine whether to grant the Fee and Expense Application for an award to Plaintiff's counsel of attorneys' fees in an amount not to exceed 15% of the Settlement Fund, or \$134,545 and reimbursement of litigation expenses in an amount not to exceed \$25,000, and an award of a Service Award to Plaintiff (to be paid, if approved by the Court, solely from the Fee and Expense Award) in an amount not to exceed \$1,000; and (g) consider any other matters that may properly be brought before the Court in connection with the Stipulation.

The Court reserves the right to hold the Settlement Hearing telephonically or by video conference, or to adjourn the Settlement Hearing or any adjournment thereof, including the consideration of the application for attorneys' fees and reimbursement of expenses, without further notice of any kind other than oral announcement at the Settlement Hearing or any adjournment thereof. Any change to the date, time, or location of the Settlement Hearing will also be posted on the Settlement Website.

The Court reserves the right to approve the Settlement at or after the Settlement Hearing with such modification(s) as may be consented to by the Parties to the Stipulation and without further notice to the Settlement Class.

VII. RIGHT TO APPEAR AND OBJECT AT SETTLEMENT HEARING

Any Settlement Class Member who objects to the class action determination, the proposed Settlement, the Judgment to be entered in the Action and/or the Fee and Expense Application, or otherwise wishes to be heard, may appear personally or by counsel at the Settlement Hearing and present evidence or argument that may be proper and relevant; provided, however, that no Settlement Class Member may be heard and no briefs, pleadings, or other documents submitted by or on behalf of any Settlement Class Member shall be considered by the Court, except by Order of the Court for good cause shown, unless not later than October 25, 2023 the date that is 14 calendar days before the Settlement Hearing, copies of (a) a written notice of intention to appear, identifying the name, address, and telephone number of the objector and, if represented, the objector's counsel; (b) proof of membership in the Settlement Class; (c) a written statement of such objector's objections and the reasons for such objector's desiring to appear and be heard, personally signed by the objecting Settlement Class Member; and (d) all documents and writings such objector desires the Court to consider, shall be filed with the Court of Chancery and, on or before such filing, served electronically via File & ServeXpress, by hand or overnight by mail upon the following counsel, such that they are received on or before October 25, 2023:

Counsel for Plaintiff:

Joshua W. Ruthizer
Wolf Popper LLP
845 Third Avenue
New York, NY 10022

Counsel for Defendants:

Kevin R. Shannon
Potter Anderson Corroon LLP
1313 N. Market Street
Hercules Plaza, 6th Floor
Wilmington, Delaware 19801

Unless the Court orders otherwise, no Settlement Class Member shall be entitled to object to the Settlement, the Judgment to be entered herein, the Fee and Expense Award, or otherwise to be heard, except by serving and filing written objections as prescribed in the foregoing Paragraph such that they are *received* on or before October 25, 2023. Any person who fails to object in the manner provided above shall be deemed to have waived the right to object (including any right of appeal) and shall be forever barred from raising such objection in this Action or in any other action or proceeding.

VIII. APPLICATION FOR ATTORNEYS' FEES AND EXPENSES

Plaintiff's Counsel intends to petition the Court for a Fee and Expense Award of attorneys' fees of no more than 15% of the Settlement Fund, or \$134,545, and reimbursement of litigation expenses of no more than \$25,000, in connection with its role in causing the Settlement and costs incurred in connection with the Action. Any award to Plaintiff's Counsel for fees and expenses shall be determined by the Court.

Plaintiff also intends to petition the Court for a Service Award of no more than \$1,000 to compensate Plaintiff for the time he spent on the Action, including consulting with Plaintiff's Counsel concerning litigation and settlement negotiation strategy.

If the Settlement is vacated, or any fee award is vacated or reduced on appeal, Plaintiff's Counsel and Plaintiff will refund the Fee and Expense Award and any Service Award, and the Settlement Amount, including the Fee and Expense Award and any Service Award, shall be returned to the Defendants, less any amounts that the Stipulation does not require to be refunded, such as Taxes and Tax Expenses and Notice and Administration Costs already incurred.

The disposition of the Fee and Expense Application is not a material term of the Stipulation, and it is not a condition of the Stipulation or the Settlement that such applications be granted. The Fee and Expense Application may be considered separately from the proposed Settlement. Any disapproval or modification of the Fee and Expense Application by the Court or on appeal shall not affect or delay the enforceability of the Stipulation, provide any of the Parties with the right to terminate the Settlement, or affect or delay the binding effect or finality of the Judgment and the release of the Released Plaintiff Claims and Released Defendant Claims. Final resolution of the Fee and Expense Application shall not be a condition to the dismissal, with prejudice, of the Action or effectiveness of the releases of the Released Plaintiff Claims.

IX. SCOPE OF THIS LONG-FORM NOTICE AND FURTHER INFORMATION

The foregoing description of the Settlement Hearing, the Action, the terms of the proposed Settlement, and other matters described herein do not purport to be comprehensive. Accordingly, Settlement Class Members are referred to the documents filed with the Court in the Action, including the Stipulation, which are available for download from the Settlement Website, www.AdvantEStockholderSettlement.com, by making a request to the Settlement Administrator at the contact information set forth in this Long-Form Notice, or for inspection at the Office of the Register in Chancery in the Court of Chancery Courthouse, 34 The Circle, Georgetown, Delaware 19947, during regular business hours of each business day.

Requests for additional copies of the Long-Form Notice, Postcard Notice, Summary Notice, Stipulation, or Court filings should be directed to the Settlement Administrator at:

Advant-e Stockholder Settlement
c/o KCC Class Action Services
P.O. Box 6162, Novato, CA 94948-6162
Toll-Free Number: 1-855-658-3943
Website: www.AdvantEStockholderSettlement.com
Email: info@AdvantEStockholderSettlement.com

Inquiries or comments about the Settlement, other than requests for additional copies of the Long-Form Notice, Postcard Notice, Summary Notice, Stipulation, or Court filings, may be directed to the following Plaintiff's Counsel:

Joshua Ruthizer
Wolf Popper LLP
845 Third Avenue
New York, NY, 10022
1-877-370-7703

X. NOTICE TO PERSONS OR ENTITIES HOLDING RECORD OWNERSHIP ON BEHALF OF OTHERS

Brokerage firms, banks, and/or other persons or entities that held shares of the common stock of Advant-e on behalf of a Settlement Class Member are requested to promptly send the Postcard Notice to all of their respective beneficial owners. If additional copies of the Postcard Notice are needed for forwarding to such beneficial owners, any requests for such copies may be made to the Settlement Administrator at

Advant-e Stockholder Settlement
c/o KCC Class Action Services
P.O. Box 6162, Novato, CA 94948-6162
Toll-Free Number: 1-855-658-3943
Website: www.AdvantEStockholderSettlement.com
Email: info@AdvantEStockholderSettlement.com

You are entitled to reimbursement from the Settlement Fund of your reasonable out-of-pocket expenses actually incurred in connection with the foregoing up to a maximum of \$0.03 for providing names, addresses, and email addresses to the Settlement Administrator; up to a maximum of \$0.03 per Postcard Notice mailed by you, plus postage at the rate used by the Settlement Administrator; or a maximum of \$0.03 per notice sent by email. Those expenses will be paid upon request and submission of appropriate supporting documentation.

DO NOT CALL OR WRITE THE COURT, THE OFFICE OF THE REGISTER IN CHANCERY, DEFENDANTS, OR THEIR COUNSEL REGARDING THIS NOTICE

Dated: August 4, 2023

BY ORDER OF THE COURT:

Register in Chancery

Exhibit C

Wolf Popper LLP Announces Proposed Settlement in the Advant-e Stockholder Litigation

NEWS PROVIDED BY
Wolf Popper LLP →
11 Aug, 2023, 08:00 ET

NEW YORK, Aug. 11, 2023 /PRNewswire/ -- The following statement is being issued by Wolf Popper LLP regarding the Advant-e Stockholder Settlement:

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

PETER J. KREHER, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

ADVANT-E CORPORATION, JASON
WADZINSKI, and JASON BOONE,

Defendants.

C.A. No. 2022-0584-SG

SUMMARY NOTICE OF PENDENCY OF STOCKHOLDER CLASS ACTION AND PROPOSED SETTLEMENT, SETTLEMENT HEARING, AND RIGHT TO APPEAR


TO: All record holders and beneficial owners of Advant-e Corporation ("Advant-e") common stock who were paid cash for fractional shares of Advant-e common stock as a result of the 1 for 20,000 reverse stock split of Advant-e common stock that took place in December 2021 (the "Settlement Class").

PLEASE READ THIS SUMMARY NOTICE CAREFULLY. YOUR RIGHTS WILL BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

Any capitalized terms used herein that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated July 6, 2023 (the "Stipulation"), which is available for download from www.AdvantEStockholderSettlement.com (the "Settlement Website") or by making a request to the Settlement Administrator at the contact information set forth herein.

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the Court of Chancery of the State of Delaware (the "Court"), that the above-captioned stockholder class action (the "Action") is pending in the Court.

YOU ARE ALSO NOTIFIED that, after arm's-length negotiations, Peter J. Kreher ("Plaintiff"), on behalf of himself and the Settlement Class, has reached a proposed settlement with Defendants Advant-e, Jason Wadzinski, and Jason Boone (the "Defendants") for \$896,973 in cash (the "Settlement"). This Summary Notice advises potential Settlement Class Members of information about the Action and the proposed Settlement. The terms of the Settlement are stated in the Stipulation between Plaintiff and Defendants dated July 6, 2023. The Stipulation and Long-Form Notice are available for download from the Settlement Website or by contacting the Settlement Administrator. If approved by the Court, the Settlement will resolve all claims in the Action as against Defendants.

A Settlement Hearing will be held on Wednesday, November 8, 2023 at 1:00 p.m., at the Court of Chancery Courthouse, 34 The Circle, Georgetown, DE 19947, to determine, among other things, (i) whether to finally certify this Action as a non-opt-out class action; (ii) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (iii) whether the Action should be dismissed with prejudice and the releases specified and described in the Stipulation (and in the Long-Form Notice) should be granted; and (iv) whether to approve the 

Fee and Expense Application for attorneys' fees not to exceed 15% of the Settlement, or \$134,545, reimbursement of litigation expenses not to exceed \$25,000, and a Service Award to Plaintiff (to be paid solely from any Fee and Expense Award) not to exceed \$1,000. The Court will also hear and consider any objections to the Settlement or the Fee and Expense Application. Any objections must be filed with the Register in Chancery and delivered to counsel for the parties such that they are received no later than October 25, 2023, in accordance with the instructions in the Long-Form Notice.

The Court may change the date or time of the Settlement Hearing without further notice to the Settlement Class. Please check the Settlement Website for any changes to the Settlement Hearing.

If you are a member of the Settlement Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Net Settlement Fund.

If the Settlement is approved by the Court and the Effective Date occurs, the Net Settlement Fund will be distributed on a *pro rata* basis to Settlement Class Members in accordance with the proposed Plan of Allocation stated in the Long-Form Notice and Stipulation or such other plan of allocation as is approved by the Court. Pursuant to the proposed Plan of Allocation, each Settlement Class Member will be eligible to receive a *pro rata* payment from the Net Settlement Fund based on the number of shares each Settlement Class Member had cashed out in the 2021 Reverse Stock Split. Settlement Class Members do not have to submit a claim form to receive a payment from the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, or the Fee and Expense Application, must be filed with the Register in Chancery in the Court of Chancery of the State of Delaware and delivered to Plaintiff's Counsel and Defendants' Counsel such that they are *received* no later than October 25, 2023, in accordance with the instructions set forth in the Long-Form Notice.

Please do not contact the Court or the Office of the Register in Chancery regarding this Notice. All questions about this Notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to the Settlement Administrator or Plaintiff's Counsel.



Requests for copies of the Long-Form Notice, Postcard Notice, Summary Notice, the Stipulation, or Court filings should be made to the Settlement Administrator:

Advant-e Stockholder Settlement

c/o KCC Class Action Services

P.O. Box 6162

Novato, CA 94948-6162

Toll-Free Number: 1-855-658-3943

Website: www.AdvantEStockholderSettlement.com

Email: info@AdvantEStockholderSettlement.com

Inquiries, other than requests for copies of the Long-Form Notice, Postcard Notice, Summary Notice, the Stipulation, or Court filings, may be made to following Plaintiff's Counsel:

Joshua Ruthizer

Wolf Popper LLP

845 Third Avenue

New York, NY, 10022

1-877-370-7703

Dated: August 11, 2023

BY ORDER OF THE COURT OF
CHANCERY OF THE STATE OF
DELAWARE

SOURCE Wolf Popper LLP