

resulting from a 1 for 20,000 reverse stock split in December 2021, which alleged breaches of fiduciary duties by Defendants and alleged that Advant-E violated 8 *Del. C.* § 155. Throughout Plaintiff's efforts on behalf of the stockholders of Advant-E, I assisted with drafting and revising all Court submissions and documents served on Defendants including the class action complaint, document and information requests, proposed orders, etc., in addition to researching Delaware legal principles, reviewing documents, assisting with communications between the parties and between the Court and the parties, and participating in all conferences between counsel regarding valuation issues. I also assisted in the negotiation and drafting of the Stipulation of Settlement and related documents. In the coming months, I will also assist, as needed, with responding to any stockholder communications regarding the litigation and the proposed Settlement

3. My firm's compensation for services rendered in the Action was entirely contingent on the success of the Action. The fees and unreimbursed expenses described herein have not been paid from any source and have not been the subject of any prior request, or prior award, in any litigation or other proceeding.

4. In sum, through July 6, 2022, the date the Stipulation was fully executed and submitted to the Court, Cooch and Taylor, P.A. devoted 28.6 attorney hours to the case, all time expended by the undersigned. Throughout the litigation, I kept in

mind the relative size of the Class and the potential recovery for the Class, and sought, at all times, to avoid duplication of effort expended by my co-counsel firm.

5. All of the time was reasonably and necessarily expended, in my opinion. Time expended by paralegals and support personnel has not been included. Nor have I included time spent on the brief and related papers in support of the Settlement. The hours worked by Cooch and Taylor, P.A. are recorded in time records kept by my firm, and they are an accurate record of the time expended by my firm.

6. Detailed below are the expenses that my firm has expended that are unreimbursed as of October 9, 2023:

EXPENSES	
Category	Amount
Filing Fees/Court Costs/Pro Hac Vice Fees ¹	717.01
Messenger/Process Server/ Federal Express to Court	39.31
Photocopies (Service of Process and Court courtesy copies)	10.00
Total:	\$766.32

¹ Not included are my firm's anticipated disbursements for Court costs related to filing the brief and supporting documents in connection with seeking approval of the proposed Settlement; copy charges for copies of documents for the Court; hearing fees; and travel expenses. Undersigned counsel's good faith estimate is that my firm will expend approximately \$800 for these additional costs.

7. The expenses attributable to this case are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records and other documents, and are an accurate record of the expenses. All of the expenses were reasonably and necessarily incurred, in my opinion.

EXECUTED on the 10th day of October 2023.

Carmella P. Keener
CARMELLA P. KEENER (DE Bar No. 2810)

On behalf of:
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SWORN TO AND SUBSCRIBED
before me this 10th day of October 2023.

Carol M. Wetty
Notary Public EXPIRES December 5, 2026
My Commission Expires 12-5-2026



EXHIBIT 1

COOCH AND TAYLOR P.A.

EDWARD W. COOCH JR.
1920-2010

DONALD C. TAYLOR
1930-2005

C. SCOTT REESE
BLAKE A. BENNETT
JAMES W. SEMPLE
R. BRUCE MCNEW
R. GRANT DICK IV
JEFFREY S. GODDESS
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THE FIRM

Cooch and Taylor, one of Wilmington's oldest and most respected law firms, was founded in 1960 by Edward W. Cooch, Jr. and Donald C. Taylor. Today it maintains a growing practice specializing in civil litigation. Its diverse practice serves the local community as well as national entities.

Cooch and Taylor's Mission Statement best describes its overall approach to the practice of law:

To provide prompt and competent legal services to the Firm's clients in a professional manner in keeping with the highest standards of the legal profession at a cost that is fair both to the clients and to the lawyers and staff of the Firm.

To maintain a working environment for the lawyers and staff of the Firm which will enable and encourage each individual to mature and grow both as a professional and as an individual.

To encourage lawyers and staff to actively participate in professional and civic activities which will improve the competency, ethics and efficiency of the legal profession and the quality of life for all people.

The Firm has an established reputation for outstanding client service and an unrivaled work environment.

CARMELLA P. KEENER

ADMISSIONS

Delaware, 1990; Delaware District Court, 1990; Third Circuit Court of Appeals

MEMBERSHIPS

Delaware State Bar Association Combined Campaign for Justice, New Castle County Co-Chairperson (2006-2014); General Co-Chair (2015-2016); Lead Chair (2017)

Delaware State Bar Association Executive Committee (2008-2009); Community Legal Aid Society, Inc. (March 2018 to Present; Past Vice-President; Past President)

PROFESSIONAL EXPERIENCE

Carmella Keener began her legal career as a judicial law clerk in the Delaware Superior Court, managing complex construction claim and complex insurance coverage litigations for three judges. Since 1991, she has focused her practice in corporate and commercial litigation, representing stockholders in class and derivative litigations pending before the Delaware Court of Chancery. She has also served as Delaware counsel in antitrust, ESOP, admiralty and class actions before the Delaware District Court. Since 1991, she has represented a number of insurance companies in insurance coverage disputes in the Delaware Superior Court, including in the Complex Commercial Litigation Division.

Carmella has served on the e-Filing Subcommittee to the Court of Chancery Rules Committee, has served as a New Castle County Co-Chairperson for the Delaware State Bar Association's Combined Campaign for Justice, and is a past member of the Executive Committee of the Delaware State Bar Association. Carmella currently serves on the Board of Directors of CLASI, one of Delaware's civil legal aid agencies, having previously served as Vice-President and President.

Carmella's recent successes in cases where she had a significant role include:

- A class action settlement that yielded a 30% increase in consideration to stockholders cashed out in a going-private transaction
- A \$16.25 million settlement of a derivative litigation alleging *Brophy* claims
- Summary judgment on behalf of an insurer in a complex insurance coverage case, which was affirmed on appeal to the Delaware Supreme Courts
- Jury verdict on behalf of insurer on complex insurance coverage claim, affirmed on appeal to the Delaware Supreme Court
- Multi-million dollar settlement of a derivative litigation with an immediate distribution of the net proceeds to the shareholders
- A \$52 million settlement of a class action on behalf of minority shareholders on the eve of trial on fiduciary duty claims in connection with a merger
- Settlement of claims after trial on behalf of minority shareholders cashed out for nominal consideration in a going-private transaction, which settlement resulted in gross additional consideration worth 6.7 times more than the original consideration
- Representing the indenture trustee of a bondholders committee and achieving on behalf of the committee partial summary judgment regarding issues of default under the indenture
- Summary judgment on behalf of insurance companies in coverage litigation regarding insurers' obligation to pay tobacco-related illness and death claims