



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

**PLAINTIFF'S MOTION FOR (I) APPROVAL OF SETTLEMENT AND  
PLAN OF ALLOCATION; (II) CERTIFICATION OF THE  
SETTLEMENT CLASS; AND (III) AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

Plaintiff, Peter J. Kreher, by his undersigned counsel hereby moves this Court for an Order approving the proposed Settlement and Plan of Allocation, as described in the parties' Stipulation of Settlement filed with this Court on July 6, 2023 (the "Stipulation", Trans. ID 70317071)<sup>1</sup>.

In addition, plaintiff seeks certification of the Settlement Class, defined as follows: "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

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<sup>1</sup> All capitalized terms have the meaning ascribed to them in the Stipulation or the Scheduling Order, entered July 20, 2023 (Trans. ID. 70439072).

common stock as a result of the 2021 Reverse Stock Split.”<sup>2</sup>

Finally, Plaintiff’s counsel seek an award of attorneys’ fees in the amount of 15% of the Settlement Fund, or \$134,545, reimbursement of litigation costs and expenses in the amount of \$19,922.64, and a service award of \$1,000 to be paid to Plaintiff from the attorneys’ fee and expense award.

The bases for this Motion are set forth in Plaintiff’s Opening Brief, filed herewith, as well as all supporting papers, affidavits, and argument to be provided to the Court in connection with this Motion. Plaintiff will also rely in support of this Motion on all filings made to date with the Court.

/s/ Carmella P. Keener  
Carmella P. Keener (#2810)  
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*Counsel for Plaintiff*  
Words permitted: 500  
Words used: 334

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<sup>2</sup> 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.

OF COUNSEL:

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Dated: October 11, 2023