



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE TILE SHOP HOLDINGS, INC.
LITIGATION

Consol. C.A. No. 2019-0892-SG

**AFFIDAVIT OF JONATHAN M. KASS, ESQ.
IN SUPPORT OF PLAINTIFFS' BRIEF IN SUPPORT OF
THEIR APPLICATION FOR APPROVAL OF THE SETTLEMENT,
AN AWARD OF ATTORNEYS' FEES AND EXPENSES,
AND PLAINTIFFS' INCENTIVE AWARDS**

I, JONATHAN M. KASS, do hereby state as follows:

1. I am a Principal of the law firm of Offit Kurman P.A. ("Offit Kurman"), and a member in good standing of the Delaware Bar. Offit Kurman, along with Bernstein Litowitz Berger & Grossmann LLP (collectively, "Plaintiff's Counsel"), acted as counsel for plaintiffs K-BAR Holdings LLC ("K-BAR") and Wynnfield Capital, Inc. ("Wynnfield" and together with K-BAR are referred to as "Plaintiffs"), in the above-captioned action ("Action").

2. I respectfully submit this Affidavit in support of Plaintiff's application for an order awarding attorneys' fees and the reimbursement of expenses incurred in the prosecution of this Action.

3. From the commencement of the Action through August 7, 2020, Offit Kurman dedicated 446.10 hours to the prosecution of the Action for a lodestar value

of \$232,486.00, based on the firm's hourly rates that are the usual and customary rates for each individual in our cases. A breakdown of the lodestar is as follows:

| Timekeeper | Hours | Rate | Lodestar |
|-------------------|--------------|---------------|---------------------|
| Partners: | | | |
| Jonathan Kass | 215.20 | \$550.00 | \$118,360.00 |
| Jonathan Kass | 171.70 | \$600.00 | \$103,020.00 |
| Paralegal: | | | |
| Laurie Sadler | 30.10 | \$195.00 | \$ 5,869.50 |
| Rose Green | 29.00 | \$180.00 | \$ 5,220.00 |
| Rose Green | .10 | \$165.00 | \$ 16.50 |
| TOTALS: | | 446.10 | \$232,486.00 |

4. During the course of this Action, Offit Kurman incurred and disbursed \$2,356.11 in expenses necessary to the prosecution of the Action through the present. These expenses are broken down as follow:

| Disbursements | |
|-----------------------------|------------|
| Messenger | \$ 145.00 |
| Court Costs & Fees | \$ 757.75 |
| Travel & Meals (Deposition) | \$1,092.36 |
| Process Server Fees | \$ 361.00 |
| TOTAL: | |
| \$2,356.11 | |

5. Offit Kurman's expenses pertaining to this case are reflected in the books and records of the firm. These books and records are prepared from invoices, bills, expense vouchers and check records, kept in the normal course of business.

6. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested.


Dated: August 31, 2020

OFFIT KURMAN, P.A.



Jonathan M. Kass (Del. ID 6003)
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SWORN TO AND SUBSCRIBED before me this 31st day of August, 2020.



Laurie A. Sadler, Notary Public
State of Delaware, New Castle County
My Commission Expires: 5/15/2023