



GRANTED

EFiled: Feb 03 2025 08:21AM EST
Transaction ID 75559910
Case No. 2023-0096-LWW



THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE GEORGE ASSAD and
CHRISTOPHER L. BEUER,

Plaintiffs,

C.A No. 2023-0096-LWW

v.

TPG INC., TPG CANNES
AGGREGATION, L.P., SHARAD S.
MANSUKANI, PAUL V.
CAMPANELLI, STEPHEN C.
FARRELL, and W. CARL WHITMER,

Defendants.

[PROPOSED] ADMINISTRATIVE ORDER

WHEREAS, the parties in the above-captioned action agreed to a settlement reflected in a Stipulation and Agreement of Settlement, Compromise, and Release, dated March 29, 2024 (the “Stipulation”) (Trans. ID 72263773);

WHEREAS, Section II.B of the Stipulation describes a method for the distribution of the Net Settlement Fund to Eligible Shares;¹

WHEREAS, the Court entered an Order and Final Judgment approving the Settlement reflected by the Stipulation on July 12, 2024 (Trans. ID 73647454);

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation.

WHEREAS, Plaintiffs filed a Motion for Administrative Order (the “Motion”), seeking (i) authorization for the Settlement Administrator, A.B. Data Ltd. (“A.B. Data”), to make an Initial Distribution of the Net Settlement Fund to Eligible Shares from the Account; (ii) approval of payment from the Account to the Administrator for unreimbursed Administrative Costs incurred in administering the Settlement; and (iii) approval of reserving amounts to pay the Administrator’s anticipated and actual Administrative Costs in connection with the Initial Distribution, including Taxes owed on the Account;

WHEREAS, in support of the Motion, Plaintiffs filed the Affidavit of Jack Ewashko in Support of the Motion (the “Ewashko Affidavit”), describing (i) the specific steps the Administrator will take to effect the Initial Distribution of the Net Settlement Fund in the manner provided in the Stipulation and (ii) the Administrative Costs that A.B. Data has incurred, and anticipates incurring, including A.B. Data’s payment and anticipated payment of Taxes owed on the Account;

IT IS HEREBY ORDERED this ____ day of _____, 2025, that the Motion is GRANTED; and

1. The Administrator, A.B. Data, is directed to arrange for the Initial Distribution of the Net Settlement Fund to Eligible Shares in the manner contemplated by the Stipulation and described in the Ewashko Affidavit, subject to Paragraphs 2-4, below.

2. \$11,643.02 shall be paid to A.B. Data from the Account for A.B. Data's unreimbursed Administration Costs, as set forth in the Ewashko Affidavit.

3. \$20,780.48 shall be reserved from the Account for A.B. Data's anticipated Administrative Costs, as set forth in the Ewashko Affidavit. A.B. Data shall be paid from that reserve for the additional, actual Administrative Costs it incurs, without further order of the Court, upon A.B. Data providing invoices to Lead Counsel.

4. \$18,375.12 shall be reserved for anticipated Taxes owed by the Account, as set forth in the Ewashko Affidavit, which A.B. Data may use to pay actual Taxes owed by the Account, pursuant to Paragraph 29(c) of the Stipulation.

Vice Chancellor Lori Will

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Lori W. Will

**File & Serve
Transaction ID:** 75551282

Current Date: Feb 03, 2025

Case Number: 2023-0096-LWW

Case Name: CLOSED 7.12.24 CONF ORD - George Assad, et al. v. TPG Inc., et al.

Court Authorizer: Lori W. Will

/s/ Judge Lori W. Will