



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE LORDSTOWN MOTORS CORP.
STOCKHOLDERS LITIGATION

CONSOLIDATED
C.A. No. 2021-1066-LWW

**PLAINTIFFS' UNOPPOSED MOTION
FOR CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE THAT Plaintiffs Benjamin Hebert and Atri Amin (“Plaintiffs”) respectfully move this Court to enter the accompanying Class Distribution Order pursuant to the terms of the Stipulation and Agreement of Settlement, Compromise, and Release (the “Stipulation”) (Trans. ID 72214268) and the Court’s Order and Final Judgment (Trans. ID 73557246) and submit in support of this motion the accompanying Affidavit of Luiggy Segura in Support of Plaintiffs’ Unopposed Motion for Class Distribution Order (the “Segura Affidavit”) submitted by the Court-approved Settlement Administrator, JND, Ltd.’s Class Action Administration Company (“JND”).^{1,2} Lead Counsel has shared a copy of this motion with Defendants’ Counsel, and Defendants’ Counsel informed us that Defendants do not oppose the motion. If approved by the Court, the Class Distribution Order will, *inter alia*:

¹ Pursuant to the Court’s Scheduling Order (Trans. ID 72494281), the Court authorized A.B. Data to act as the Settlement Administrator in connection with the Settlement of this Action.

² Plaintiffs incorporate by reference the definitions in the Stipulation and the Segura Affidavit, and all capitalized terms used herein shall have the same meanings as set forth in the Stipulation and/or the Segura Affidavit.

1. Direct JND to distribute the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payment of JND's fees and expenses requested in this motion, and after deducting a "reserve" for estimated taxes, the costs of preparing appropriate tax returns, escrow fees, and administrative contingencies as set forth in paragraph 10 of the Segura Affidavit (the "Distribution")³.

2. Consistent with ¶ 51 of the Court-approved Plan of Allocation stated in the Notice disseminated to Class Members, direct that each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the "Per-Share Recovery" for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. (Segura Affidavit ¶ 10(a)).

3. Consistent with ¶ 52(i) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, JND shall cause that portion of the Net Settlement Fund to be allocated to Eligible Class Members who held their Eligible Shares through DTC Participants to be paid

³ As indicated in ¶ 6 of the Segura Affidavit, JND has determined there are no non-Cede shares eligible under the terms of the Settlement nor eligible record holders.

to the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,⁴ subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. (Segura Affidavit ¶ 10(b)). The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Member. (*Id.*)

4. For the avoidance of doubt, to the extent that any DTC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of DiamondPeak Class A common stock entitled to payment, whether through permitting naked short-selling or the cash settlement of short positions or through any other means, such DTC Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners an amount equal to the Per-Share Recovery. Whether DTC, any DTC Participant, or DTC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court. (Segura Affidavit ¶ 10(c)).

5. Consistent with ¶ 52(iii) of the Court-approved Plan of Allocation,

⁴ For each DTC Participant, the "Closing Security Position" is the number of Eligible Shares held by such DTC Participant, as reflected on the DTC Allocation Report. *See* Notice n.3.

direct that any person or entity who purchased Eligible Shares but had not settled those Eligible Shares by the Effective Time of the Merger on October 23, 2020 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares on or before the Effective Time of the Merger on October 23, 2020 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares. (Segura Affidavit ¶ 10(d)).

6. Consistent with ¶ 52(iv) of the Court-approved Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from the check’s issue date), the DTC Participants or the holder of a Closing Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution. (Segura Affidavit ¶ 10(e)).

7. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares. (Segura Affidavit ¶ 10(f)).

8. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all

Distribution checks will bear a notation “CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE].” (Segura Affidavit ¶ 10(g)).

9. All undeliverable or uncashed payments returned to JND by DTC Participants will be available for further distribution provided that such distribution is economically feasible. At such time as Co-Lead Counsel, in consultation with JND, determine that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice (the “CCJ”). (Segura Affidavit ¶ 10(h)).

10. Authorize the destruction of paper copies of all supporting documentation one year after the distribution of the Net Settlement Fund, and the destruction of electronic copies of the same one year of documentation after all funds in the Net Settlement Fund have been distributed. (Segura Affidavit ¶ 10(i)).

11. Direct that payment pursuant to the Class Distribution Order shall be final and conclusive against all Eligible Class Members, and release and discharge all Persons involved in the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund, from any and all claims arising out

of such involvement, and bar all Class Members, whether or not they receive payment from the Net Settlement Fund, from making any further claims against the Net Settlement Fund, Plaintiffs, Co-Lead Counsel, the Settlement Administrator (JND), or any other agent retained by Plaintiffs or Co-Lead Counsel in connection with the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund beyond the amounts allocated to Eligible Closing Date Stockholders.

12. Approve all of JND's fees and expenses incurred in connection with the administration of the Settlement and estimated to be incurred in connection with the distribution of the Net Settlement Fund as set forth in Exhibit A to the Segura Affidavit and authorize Plaintiffs' Counsel to direct payment out of the Settlement Fund to JND in payment of any such outstanding fees and expenses.

13. Retain jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: February 19, 2025

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**

OF COUNSEL:

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Counsel for Plaintiffs

WORDS: 1,301 (of 3,000 Word Limit)

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE LORDSTOWN MOTORS CORP.
STOCKHOLDERS LITIGATION

CONSOLIDATED
C.A. No. 2021-1066-LWW

[PROPOSED] CLASS DISTRIBUTION ORDER

The Court, having considered Plaintiffs' Unopposed Motion for Class Distribution Order (the "Motion"), and for good cause shown, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Settlement Administrator shall implement the proposed Plan of Distribution as described in the Motion.

IT IS SO ORDERED this ____ day of _____, 2025.

Vice Chancellor Lori W. Will

as the Settlement Administrator, JND has implemented the terms of the Settlement by, among other things: (i) mailing the Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the “Notice”) to potential Class Members; (ii) causing the publication of the Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear in *Investor’s Business Daily* and *PR Newswire*; (iii) creating and continuing to maintain a toll-free helpline and a Settlement website to assist potential Eligible Class Members during the course of the administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

3. On July 5, 2024, the Court entered the Order and Final Judgment (the “Final Approval Order”) (Trans. ID 73557246), granting final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the “Plan of Allocation”). I submit this Affidavit in support of Plaintiffs’ motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Class Members in accordance with the terms of the Settlement and the Court-approved Plan of Allocation. *See* Notice ¶ 47. The following statements are based on my personal knowledge and information provided by JND employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

MERGER RECORDS

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Class Members, *i.e.*, all holders of DiamondPeak Holdings Corp. (“DiamondPeak”) Class A common stock as of the Effective Time of the merger of DiamondPeak and Lordstown EV Corporation (“Legacy LMC”) (the “Merger”) on October 23, 2020. In accordance with the terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders or Redeeming Stockholders. *See* Notice ¶¶ 47-49; Stipulation ¶1(f).

5. Consistent with ¶ 43 of the Court-approved Plan of Allocation, Eligible Class Members were not required to file a claim in order to receive a distribution from the Net Settlement Fund.

6. On April 11, 2024, JND received from Co-Lead Counsel an Excel spreadsheet identifying Registered Holders of DiamondPeak Class A common stock as of the Effective Time of the Merger. The spreadsheet contained the names, addresses, and number of DiamondPeak Class A shares held by each of the Registered Holders. The spreadsheet identified 201 Registered Holders, holding a total of Class A 164,326,089 shares of DiamondPeak common stock. This included one record for Cede & Co. (“Cede”) with a total of 27,376,196 shares of DiamondPeak Class A common stock and 200 non-Cede individual record holders with 136,949,893 Class A shares of DiamondPeak common stock, discussed in more

detail below. JND consulted with Co-Lead Counsel and determined that the 136,949,893 Class A non-Cede shares held by individual record holders are not eligible under the terms of the Settlement as they were either shares from the PIPE transaction or Class B shares that were converted into Class A Shares in connection with the Merger. Accordingly, the only Eligible Shares reflected on the Registered Holder report are the 27,376,196 shares of DiamondPeak Class A common stock held by Cede.

7. In addition, on April 4, 2024, JND received an Allocation Report from Cede, as nominee for the Depository Trust & Clearing Company (“DTC”), showing each DTC Participant’s holdings of DiamondPeak securities as of the Effective Time of the Merger. JND consulted with the DTC to confirm the accuracy of the information and security positions identified in the DTC Allocation Report. In consultation with Co-Lead Counsel, though the Allocation Report also included warrant holding positions, the Parties confirmed that only Class A common stock and units² are eligible to receive payment under the terms of this Settlement. The Allocation Report included an additional 622,834 Eligible Shares that were not reflected on the Registered Holder Report. The additional 622,834 Eligible Shares reported only on the Allocation Report added to the 27,376,196 shares on the

² JND was informed that each DiamondPeak Unit included one share of Class A common stock.

Registered Holder Report calculate to 27,999,030 total shares. On this basis, the DTC Allocation Report identified 104 DTC Participants holding a total of 27,999,030 DiamondPeak Class A common stock shares, most of which were also reflected on the Registered Holder report discussed above. Accounting for the 1,000,000 Excluded Shares described in paragraph 8 below, the total Eligible Shares held by Cede for the ultimate beneficial owner(s) (“Eligible Beneficial Holders”) is 26,999,030.

8. By definition, any shares held by Excluded Stockholders or Redeeming Stockholders are not eligible to participate in the Settlement (“Excluded Shares”). Defendants’ Counsel provided JND with information concerning the stockholdings of the identified Excluded Stockholders. This report included the name of the Excluded Stockholders, the number of shares held, and the location of those shares. Although the report originally reflected nearly 8 million shares, after further review, it was discovered that the majority of those shares were held by individual Registered Holders, and already ineligible, as discussed in paragraph 6 above. Accordingly, the revised count of Excluded Shares held by Excluded Stockholders is 1,000,000. JND has worked to successfully confirm the Excluded Share count for each of the Excluded Stockholders. These Excluded Shares are held in seven (7) Beneficial Holder accounts and are not included in the Eligible Share count. In addition, Co-Lead Counsel confirmed that there are no Redeeming Stockholders to separately

exclude because the 970 DiamondPeak Class A shares that were redeemed were not included on the DTC Allocation Report and thus not Eligible Shares.

SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS

9. JND agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Co-Lead Counsel received regular reports of all the work JND performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of JND's total fees and expenses for this matter through January 31, 2024, which total \$194,590.04, and JND's estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the "Distribution Plan" described below is \$33,449.36. To date, JND has received \$89,186.94 for its fees and expenses. Accordingly, there is an outstanding balance of \$138,852.46 payable to JND, which amount includes JND's anticipated fees and expenses for the initial distribution.

DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

10. JND will distribute the Net Settlement Fund to Eligible Class Members³, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting a "reserve" for estimated

³ As indicated in ¶ 6, JND in consultation with Co-Lead Counsel, determined that there are no non-Cede shares eligible under the terms of the Settlement and no eligible record holders.

taxes, the costs of preparing appropriate tax returns, escrow fees, and administrative contingencies (the “Distribution”),⁴ as follows:

a. Consistent with ¶ 51 of the Court-approved Plan of Allocation, each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery” for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. Based upon the total number of identified Eligible Shares and the estimated Net Settlement Fund available for distribution, the estimated Per-Share Recovery basis is \$0.42 per share.⁵

b. Consistent with ¶ 52(i) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, JND will cause that portion

⁴ 95% of the Net Settlement Fund will be distributed immediately, and 5% will be held in reserve for taxes, tax returns, escrow fees, and administrative contingencies. The funds available from the reserve will be distributed approximately 9 months after the initial distribution.

⁵ Based on the estimated Net Settlement Fund available for the initial distribution, the estimated Per-Share Recovery for the initial distribution is approximately \$0.40 per Eligible Share.

of the Net Settlement Fund to be allocated to Eligible Class Members who held their Eligible Shares through DTC Participants to be paid to DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,⁶ subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Member.

c. For the avoidance of doubt, to the extent that any DTC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of DiamondPeak Class A common stock entitled to payment, whether through permitting naked short-selling or the cash settlement of short positions or through any other means, such DTC Participants, or their

⁶ For each DTC Participant, the “Closing Security Position” is the number of eligible shares held by such DTC Participant, as reflected on the DTC Allocation Report. *See* Notice n.3.

respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners an amount equal to the Per-Share Recovery. Whether DTC, any DTC Participant, or DTC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court.

d. Consistent with ¶ 52(iii) of the Court-approved Plan of Allocation, for the avoidance of doubt, any person or entity who purchased Eligible Shares but had not settled those Eligible Shares by the Effective Time of the Merger on October 23, 2020 ("Non-Settled Shares") *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares on or before the Effective Time of the Merger on October 23, 2020 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares.

e. Consistent with ¶ 52(iv) of the Court-approved Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from the

check's issue date), the DTC Participants shall follow their respective policies with respect to further attempted distribution.

f. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.

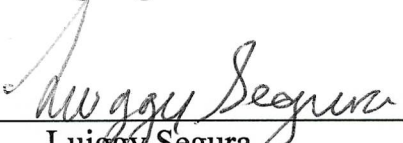
g. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]."

h. All undeliverable or uncashed payments returned to JND by DTC Participants will be available for further distribution provided that such distribution is economically feasible. At such time as Co-Lead Counsel, in consultation with JND, determine that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid

fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice (the "CCJ").

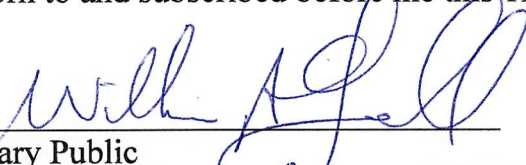
i. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed this 19th day of February, 2025.



Luiggy Segura

Sworn to and subscribed before me this 19th day of February, 2025.



Notary Public
State of New York, Suffolk County

WILLIAM A. O'LOUGHLIN
Notary Public, State of New York
No. 01OL5084336

My Commission Expires: September 2, 2025
Qualified in Suffolk County
Commission Expires September 2, 2025

Personally Known or Produced Identification.

Type of Identification Produced: _____

EXHIBIT A

Invoice Date	Invoice Number	Amount
4/29/2024	171567	\$ 24,483.20
5/23/2024	171669	\$ 77,477.38
6/26/2024	171907	\$ 33,109.82
8/5/2024	172213	\$ 31,675.50
8/21/2024	172306	\$ 4,790.97
9/18/2024	172542	\$ 3,484.34
10/22/2024	172868	\$ 3,322.68
11/26/2024	173122	\$ 3,083.87
12/16/2024	173217	\$ 2,846.40
1/15/2025	173898	\$ 3,367.19
2/6/2025	174080	\$ 6,948.69
1/15/2025	Distribution Estimate (173897)	\$ 33,449.36

Total	\$ 228,039.40
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**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
4/29/2024	171567

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - March 31, 2024)		
	FEES:		
1	Initial Project and Database Set-Up Fee	7,500.00	7,500.00
1	IVR Set-Up Fee	1,900.00	1,900.00
4	IVR Maintenance Fee	50.00	200.00
1	Contact Center – Setup	160.00	160.00
4.25	Website Set-Up and Design Fee	135.00	573.75
4	Website Hosting	155.00	620.00
10	Forms Set-up	160.00	1,600.00
2.75	Summary Notice “Production Costs”	290.00	797.50
1.5	Senior Executive (includes declarant)	650.00	975.00
16	Director	210.00	3,360.00
1	Network Administrator	210.00	210.00
3	Assistant Director	180.00	540.00
13.25	Senior Project Manager Working with financial Institutions and Brokers	160.00	2,120.00
5.5	Senior Data Analyst	160.00	880.00
1.5	Data Analyst	135.00	202.50
1.75	Project Manager	135.00	236.25
8.75	Assistant Project Manager	100.00	875.00
	EXPENSES:		
2	PO Box	175.00	350.00
	Domain Charges	1,383.20	1,383.20

Invoice Total	\$24,483.20
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
5/23/2024	171669

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
38.24	IVR Use/minute	0.32	12.24
1	Website Set-Up and Design Fee	135.00	135.00
1	Website Hosting	155.00	155.00
1.25	Forms Set-up	160.00	200.00
1	Address Trace	160.00	160.00
197	Address Update Before 1st Mailing	0.025	4.93
10.25	Broker Mailing	100.00	1,025.00
70,000	Print 20-Page Notice Packet	0.53	37,100.00
4.75	Summary Notice "Production Costs"	290.00	1,377.50
1	Senior Executive (includes declarant)	650.00	650.00
14	Director	210.00	2,940.00
4	Network Administrator	210.00	840.00
16.75	Senior Project Manager Working with financial Institutions and Brokers	160.00	2,680.00
6.5	Senior Data Analyst	160.00	1,040.00
3.5	Data Analyst	135.00	472.50
17	Project Manager	135.00	2,295.00
8.5	Assistant Project Manager	100.00	850.00
4.25	Contact Center Agent	65.00	276.25
	EXPENSES:		
1	PO Box	175.00	175.00
Invoice Total			
Total Balance Due			



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
5/23/2024	171669

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
266	Postage	3,186.06	3,186.06
	DTCC Exception Processing	20,825.00	20,825.00
	Electronic Storage	0.003	0.80
	Broker Reimbursement	1,027.10	1,027.10

Invoice Total	\$77,477.38
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1100 2nd Ave., Suite 300
Seattle, WA 98101
206.788.8750
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www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
6/26/2024	171907

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
396.3	IVR Use/minute	0.32	126.82
1	Website Hosting	155.00	155.00
5.75	Mailing Coordination	100.00	575.00
1	Address Trace	160.00	160.00
31.75	Broker Mailing	100.00	3,175.00
2	Summary Notice "Production Costs"	290.00	580.00
1.5	Senior Executive (includes declarant)	650.00	975.00
8.75	Director	210.00	1,837.50
1.75	Network Administrator	210.00	367.50
6	Senior Project Manager Working with financial Institutions and Brokers	160.00	960.00
11.25	Senior Data Analyst	160.00	1,800.00
4.5	Data Analyst	135.00	607.50
14.25	Project Manager	135.00	1,923.75
1	Assistant Project Manager	100.00	100.00
17.25	Contact Center Agent	65.00	1,121.25
1	US1 National Newsline	3,620.00	3,620.00
1	Investor's Business Daily	4,400.00	4,400.00
	EXPENSES:		
1	PO Box	175.00	175.00
	Postage	8,060.53	8,060.53
Invoice Total			
Total Balance Due			



**CLASS ACTION
ADMINISTRATION**

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 1100 2nd Ave., Suite 300
 Seattle, WA 98101
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
6/26/2024	171907

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
8,527	Electronic Storage	0.003	25.58
	Broker Reimbursement	754.90	754.90
18	Copy Charges	0.25	4.50
	FedEx	1,554.99	1,554.99

Invoice Total	\$33,109.82
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/5/2024	172213

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
491.04	IVR Use/minute	0.32	157.13
1	Website Hosting	155.00	155.00
8.5	Mailing Coordination	100.00	850.00
4	Broker Mailing	100.00	400.00
0.5	Senior Executive (includes declarant)	650.00	325.00
7.5	Director	210.00	1,575.00
4.5	Senior Project Manager Working with financial Institutions and Brokers	160.00	720.00
1.25	Data Analyst	135.00	168.75
22	Project Manager	135.00	2,970.00
3	Assistant Project Manager	100.00	300.00
12.75	Contact Center Agent	65.00	828.75
	EXPENSES:		
1	PO Box	175.00	175.00
	Postage	291.51	291.51
8,913	Electronic Storage	0.003	26.74
	Broker Reimbursement	22,607.37	22,607.37
301	Copy Charges	0.25	75.25

Invoice Total	\$31,675.50
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/21/2024	172306

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
147.21	IVR Use/minute	0.32	47.11
1	Website Hosting	155.00	155.00
2.5	Mailing Coordination	100.00	250.00
0.5	Broker Mailing	100.00	50.00
0.5	Senior Executive (includes declarant)	650.00	325.00
7.5	Director	210.00	1,575.00
1.25	Senior Project Manager Working with financial Institutions and Brokers	160.00	200.00
9.5	Project Manager	135.00	1,282.50
2.75	Assistant Project Manager	100.00	275.00
5.75	Contact Center Agent	65.00	373.75
	EXPENSES:		
1	PO Box	175.00	175.00
	Postage	5.35	5.35
9,087	Electronic Storage	0.003	27.26

Invoice Total	\$4,790.97
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
9/18/2024	172542

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
60.13	IVR Use/minute	0.32	19.24
1	Website Hosting	155.00	155.00
1	Mailing Coordination	100.00	100.00
7	Director	210.00	1,470.00
1	Senior Project Manager Working with financial Institutions and Brokers	160.00	160.00
7.5	Project Manager	135.00	1,012.50
1	Assistant Project Manager	100.00	100.00
3.25	Contact Center Agent	65.00	211.25
	EXPENSES:		
1	PO Box	175.00	175.00
	Postage	1.02	1.02
9,110	Electronic Storage	0.003	27.33
12	Copy Charges	0.25	3.00

Invoice Total	\$3,484.34
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Total Balance Due



**CLASS ACTION
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
10/22/2024	172868

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
20.53	IVR Use/minute	0.32	6.57
1	Website Hosting	155.00	155.00
6.75	Director	210.00	1,417.50
1.75	Senior Project Manager Working with financial Institutions and Brokers	160.00	280.00
8.25	Project Manager	135.00	1,113.75
1.5	Contact Center Agent	65.00	97.50
	EXPENSES:		
1	PO Box	175.00	175.00
9,119	Electronic Storage	0.003	27.36

	Invoice Total \$3,322.68
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
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Seattle, WA 98101
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
11/26/2024	173122

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
46.58	IVR Use/minute	0.32	14.91
1	Website Hosting	155.00	155.00
5	Director	210.00	1,050.00
1.5	Senior Project Manager Working with financial Institutions and Brokers	160.00	240.00
1.75	Senior Data Analyst	160.00	280.00
7	Project Manager	135.00	945.00
2.25	Contact Center Agent	65.00	146.25
	EXPENSES:		
1	PO Box	175.00	175.00
9,236	Electronic Storage	0.003	27.71

Invoice Total	\$3,083.87
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Total Balance Due



**CLASS ACTION
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Class Action Administration LLC
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
12/16/2024	173217

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
	FEES:		
2.25	Contact Center Agent	65.00	146.25
4.75	Director	210.00	997.50
1	IVR Maintenance Fee	50.00	50.00
3.69	IVR Use/minute	0.32	1.18
1	Escalated Communications	160.00	160.00
8.25	Project Manager	135.00	1,113.75
1	Website Hosting	155.00	155.00
	EXPENSES:		
9,240	Electronic Storage	0.003	27.72
1	PO Box	195.00	195.00

	Invoice Total \$2,846.40
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
1/15/2025	173898

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
	FEES:		
1.5	Contact Center Agent	65.00	97.50
6.25	Director	210.00	1,312.50
2.75	Handling General Communications and Processing Exclusion Requests	100.00	275.00
1	IVR Maintenance Fee	50.00	50.00
37.38	IVR Use/minute	0.32	11.96
0.5	Senior Executive	650.00	325.00
0.25	Senior Project Manager	160.00	40.00
6.5	Project Manager	135.00	877.50
1	Website Hosting	155.00	155.00
	EXPENSES:		
9,243	Electronic Storage	0.003	27.73
1	PO Box	195.00	195.00

Invoice Total	\$3,367.19
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

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 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
2/6/2025	174080

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
	FEES:		
1.25	Contact Center Agent	65.00	81.25
18.75	Director	210.00	3,937.50
1	IVR Maintenance Fee	50.00	50.00
10.03	IVR Use/minute	0.32	3.21
1.25	Senior Project Manager	160.00	200.00
17	Project Manager	135.00	2,295.00
1	Website Hosting	155.00	155.00
	EXPENSES:		
9,244	Electronic Storage	0.003	27.73
1	PO Box	195.00	195.00
16	Copy Charges	0.25	4.00

Invoice Total	\$6,948.69
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
1/15/2025	173897

PROJECT	TERMS
LMC - In re Lordstown Motors Corp Stockho	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Distribution Estimate (Assumes 9 Months)		
	FEES		
45	Check Printing, including reissues	0.21	9.45
45	Wire Process	160.00	7,200.00
10	Director	210.00	2,100.00
10	Data Analyst	135.00	1,350.00
25	Project Manager	135.00	3,375.00
10	Reissue Distribution Checks	160.00	1,600.00
20	Account Management and Reconciliation	160.00	3,200.00
800	IVR Minutes	0.32	256.00
15	Contact Center Services	65.00	975.00
15	Class Member Communication	100.00	1,500.00
9	IVR Maintenance Fee	50.00	450.00
9	Website Monthly Maintenance Fee	155.00	1,395.00
1	OFAC Search	5,000.00	5,000.00
	EXPENSES		
45	Check Postage, including reissues	0.71	31.95
83,660	Electronic Storage	0.006	501.96
	Supplies	150.00	150.00
	FedEx	75.00	75.00
100	Copy Charges	0.25	25.00
9	PO Box	195.00	1,755.00
1	Document Destruction	2,500.00	2,500.00

Invoice Total \$33,449.36

Total Balance Due