



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE TILE SHOP HOLDINGS, INC.
LITIGATION

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

PLAINTIFFS' UNOPPOSED MOTION FOR ADMINISTRATIVE ORDER

Plaintiffs, K-Bar Holdings LLC and Wynnefield Capital, Inc., by and through their attorneys, hereby move this Court for entry of the accompanying [Proposed] Administrative Order approving the distribution plan proposed pursuant to this Court's Order and Final Judgment (Trans. ID 66014623).¹ In further support of this motion, Plaintiffs submit (i) the Affidavit of Luiggy Segura in Support of Plaintiffs' Unopposed Motion for Administrative Order (the "Segura Affidavit") submitted on behalf of the Court-approved Claims Administrator, JND Legal Administration ("JND"); (ii) Plaintiffs' Brief in Support of Unopposed Motion for Administrative Order; and (iii) all other papers and proceedings herein.

Among other things, the Administrative Order would: (i) approve the administrative determinations of JND accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action; (ii) direct the distribution of the Net Cash Settlement Fund to Claimants whose Claims are

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Segura Affidavit or the Stipulation of Settlement dated as of August 7, 2020 (Trans. ID 65830861) (the "Stipulation").

accepted by JND as valid and approved by the Court (“Authorized Claimants”), while maintaining a Reserve for any tax liability or claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi) approve JND’s fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time.

Pursuant to the terms of the Stipulation, Defendants take no position on this Motion. There are no disputed Claims by any Settlement Class Member requiring Court review, and the motion is ripe for determination. As this matter is fully briefed before the Court, a hearing on this motion is not required. Lead Counsel respectfully requests that this motion be decided on the papers.

Dated: April 22, 2022

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WORD COUNT: 334

CERTIFICATE OF SERVICE

I, Gregory Varallo, hereby certify that, on April 22, 2022, the foregoing *Plaintiffs' Unopposed Motion for Administrative Order*, supporting *Plaintiffs' Brief*, and supporting *Affidavit of Luiggy Segura* were filed and served via File & ServeXpress upon the following counsel of record:

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