

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:21-cv-02774-RMR-KAS  
Consolidated with 1:21-cv-3215-RMR-KAS

JOHNNY R. SHAFFER,  
DAVID P. SARRO,  
KEVIN L. TYE  
JESS Q. WILLIAMS  
JUSTIN COHEN

Individually and On Behalf of All Others Similarly Situated

Plaintiffs,

v.

LIGHTNING EMOTORS, INC.  
TIMOTHY R. REESER,  
TERESA P. COVINGTON,  
GIGACQUISITIONS3 LLC,  
GIGCAPITAL GLOBAL  
AVI S. KATZ,  
RALUCAL DINU  
DEIL MIOTTO  
GIGFOUNDERS LLC  
BRAD WEIGHTMAN  
ANDREA BETTI-BERUTTO  
PETER WANG  
JOHN J . MIKULSKY, and  
ROBERT FENWICK-SMITH,

Defendants.

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**AFFIDAVIT OF MICHELE S. CARINO FILED ON BEHALF OF  
GREENWICH LEGAL ASSOCIATES LLC IN SUPPORT OF  
APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

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time reflected in the Firm's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the State Action.

3. After the reductions referred to above, the number of hours spent on the State Action by GLA is 80.00. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for the attorney/paraprofessional time based on GLA's current rates is \$46,500.00. The hourly rates shown in Exhibit A are consistent with hourly rates submitted by the Firm in other class action litigation, and consistent with what GLA actually charges clients where GLA has agreed to provide services on an hourly basis and not a contingency fee. GLA's rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side.

4. Set forth below is a brief description of services rendered for each person for whom fees are claimed and a summary of their relevant qualifications and experience:

a. I joined GLA in 2022 as Of Counsel of the firm. Prior to joining GLA, I worked as Counsel for the law firms of Pomerantz LLP in New York, New York, and Grant & Eisenhofer in Wilmington, Delaware. At GLA, I have served as a plaintiff side attorney representing the interests of

individual investors. In the instant matter, I acted as the primary contact for plaintiff Richard Delman and facilitated communications between and among plaintiff and co-counsel, including but not limited to: (i) discussing case analyses; (ii) reviewing pleadings and briefs; (iii) providing regular updates regarding cases status and discovery; and (iv) relaying plaintiff's comments and feedback concerning settlement during both the mediation and post-mediation discussions. I billed 50 hours over the course of the litigation.

b. Inga Nogueira is a paralegal at GLA. Ms. Nogueira was responsible for maintaining the files and coordinating signatures and notarization as needed. Ms. Nogueira billed 30 hours to the case.

5. GLA is not seeking an award of expenses.

I have read this affidavit and declare under penalty of perjury that the foregoing is true and correct.

**FURTHER AFFIANT SAYETH NOT.**

*Michele S. Carino*  
Michele S. Carino

SUBSCRIBED and SWORN to me this 3<sup>rd</sup> day of October 2024 by Michele S. Carino.

Witness my hand and official seal.

My Commission Expires:

*Inga Nogueira*  
Notary Public

<p><b>INGA NOGUEIRA</b> Notary Public, Connecticut My Commission Expires 02/28/2029</p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Court's Electronic Mail Notice List.

s/ Hillary B. Stakem  
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HILLARY B. STAKEM

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# EXHIBIT A

*Delman v. GigAcquisitions3, LLC, et al.,*

C.A. No. 2021-0679-LWW

Time Report for Greenwich Legal Associates LLC

<b>TIMEKEEPER</b>	<b>TOTAL HOURS</b>	<b>RATE</b>	<b>TOTAL LODESTAR</b>
<b>Of Counsel</b>			
Michele S. Carino	50	\$750/hr	\$37,500
<b>Paralegal</b>			
Inga Nogueira	30	\$300/hr	\$9,000
<b>TOTAL</b>	<b>80</b>		<b>\$46,500</b>