

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU**

DANIEL OHEBSHALOM, THOMAS FAN,
MATTHEW KIMOTO, and CLINTON BROWN,
individually and on behalf of all others similarly
situated,

Plaintiffs,

- against -

DAPPER LABS, INC.,

Defendant.

Index No.: 615987/2025

**JOINT STIPULATION TO
EXTEND DEADLINES**

Motion Seq. 001

Plaintiffs Daniel Ohebshalom, Thomas Fan, Matthew Kimoto, and Clinton Brown (“Plaintiffs”) and Defendant Dapper Labs, Inc. (“Defendant”) (collectively with Plaintiffs, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs filed their Unopposed Motion for Preliminary Approval of Class Action Settlement on August 27, 2025 (Doc. Nos. 6-11);

WHEREAS, on December 19, 2025, this Court granted Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and appointed Epiq Systems, Inc. (“Epiq”) as the Settlement Claims Administrator and directed Epiq to administer the settlement in accordance with the terms of the Settlement Agreement (Doc. No. 20);

WHEREAS, the Court, in its December 19, 2025 Order, approved the proposed Class Notice and Claim Form and directed its distribution to the Settlement Class consistent with the terms of the Settlement agreement, and approved the deadlines set forth in the Settlement Agreement for Class Members to submit Claims Forms, objections, or requests for exclusion from the Settlement Agreement (Doc. No. 20);

WHEREAS, the Court set a hearing date of April 15, 2026 for the Motion for Final Approval of the Settlement Agreement, and directed Plaintiffs to file their Motion for Final Approval of the Settlement Agreement no later than seven days before the hearing (Doc. No. 20);

WHEREAS, given that the 30-day notice period began during the end-of-year holidays because the Court issued its Order on December 19, 2025, the Parties have agreed to adjust the deadlines to give Epiq an additional 26 days to complete the notice process and while simultaneously giving Class Members the same amount of time to opt-out or file objections as they had been entitled to before the extension;

WHEREAS, the 26-day extension of deadlines will not alter the Court's April 15, 2026 hearing date;

WHEREFORE, the Parties jointly stipulate to and request that the Court extend the deadlines as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Notice Date	January 18, 2026	February 13, 2026
Motion for Final Approval	March 4, 2026	March 27, 2026
Motion for Attorneys' Fees	March 4, 2026	March 27, 2026
Claims Deadline	March 19, 2026	April 15, 2026
Objection/Exclusion Deadline	March 19, 2026	April 15, 2026
Opposition to Motion for Final Approval	March 19, 2026	April 3, 2026
Opposition to Motion for Attorneys' Fees	March 19, 2026	April 3, 2026
Reply In Support of Motion for Final Approval	March 29, 2026	April 8, 2026
Reply in Support of Motion for Attorneys' Fees	March 29, 2026	April 8, 2026

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STIPULATED AND AGREED:

Dated: January 15, 2026
New York, New York

By: /s/ Kenneth P. Herzinger

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