



GRANTED WITH MODIFICATIONS

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

COLLEEN WITMER, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

BARRY H. GOLSEN, STEVEN L.
PACKEBUSH, MARK T.
BEHRMAN, JONATHAN S. BOBB,
KANNA KITAMURA, RICHARD
SANDERS, JR., RICHARD W.
ROEDEL, LYNN F. WHITE, DIANA
M. PENINGER, LSB INDUSTRIES,
INC., and COMPUTERSHARE
TRUST COMPANY, N.A.,

Defendants.

C.A. No. 2024-0351-PAF

**STIPULATION AND [PROPOSED] ORDER CONCERNING PLAINTIFF’S
COUNSEL’S APPLICATION FOR AN AWARD OF ATTORNEYS’ FEES
AND REIMBURSEMENT OF EXPENSES**

WHEREAS:

A. On May 31, 2024, plaintiff Colleen Witmer (“Plaintiff”) filed her application for an award of attorneys’ fees and reimbursement of expenses (the “Fee and Expense Application”) in connection with the mooted claims in the above-captioned action; and

B. On May 31, 2024, the Court instructed the parties to provide “appropriate notice to stockholders” in a form “approved by the court” (the “Notice”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, subject to the approval of the Court, that:

1. The Notice, appended hereto as Exhibit A, is approved.
2. On or before August 2, 2024, Defendants shall file any omnibus brief in opposition to the Fee and Expense Application.
3. On or before September 17, 2024, Plaintiff shall file any reply in further support of the Fee and Expense Application.
4. The Court will hear oral argument on the Fee and Expense Application on October 4, 2024, at 1:30 p.m. in Wilmington, Delaware.

Dated: June 20, 2024

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Attorneys for Defendants Barry H. Golsen, Steven L. Packebush, Mark T. Behrman, Jonathan S. Bobb, Kanna Kitamura, Richard Sanders, Jr., Richard W. Roedel, Lynn F. White, Diana M. Peninger, and LSB Industries, Inc.

SO ORDERED this ____ day of _____, 2024.

Vice Chancellor Paul A. Fioravanti, Jr.

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

Court: DE Court of Chancery Civil Action

Judge: Paul A Fioravanti Jr

**File & Serve
Transaction ID:** 73439256

Current Date: Jul 02, 2024

Case Number: 2024-0351-PAF

Case Name: Colleen Witmer v. Barry H. Golsen, et al.

Court Authorizer: Paul A Fioravanti Jr

Court Authorizer

Comments:

The notice shall be posted on the websites of the corporate defendant and the websites of all plaintiffs' counsel starting no later than July 8, 2025, and continuing through the date of the hearing on the fee application.

/s/ Judge Paul A Fioravanti Jr