IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

D1 JASPER HOLDINGS LP, D1 SPV JL
MASTER LP, JAY BLOCKER LTD., JAY
DOMESTIC LLC, GCCU II LLC, TOCU XX
LLC, OC II FIE VIII LP, JL SPV HOLDINGS,
LLC, EMS J-INV LLC, DISRUPTIVE
TECHNOLOGY SOLUTIONS XIV, LLC,
DISRUPTIVE TECHNOLOGY SOLUTIONS
XVI, LLC—SERIES A, DISRUPTIVE
TECHNOLOGY SOLUTIONS XVI, LLC—
SERIES B, and DISRUPTIVE TECHNOLOGY
SOLUTIONS XVI, LLC—SERIES C,

C.A. No. 2023-1060-NAC

Plaintiffs,

v.

JUUL LABS, INC. and JL TAO LLC,

Defendants.

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL

The Court having considered Plaintiffs' Motion to Compel, or in the Alternative, to Strike (the "Motion"), and any further submissions or arguments, and good cause having been shown,

IT IS HEREBY ORDERED, this _____ day of _____, 2024, that:

- 1. The Motion is **GRANTED**; and
- 2. The Independent Committee shall produce within five calendar days unredacted versions of all documents concerning any advice the Independent Committee received as to whether the Insider Financing constituted a Qualified



Financing,	and as to	the requir	rements of a	Qualified	Financing,	including	but not
limited to t	he docum	ents identi	fied in Appe	endices A a	nd B.		

Vice Chancellor Nathan A. Cook