



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE SEARS HOMETOWN AND  
OUTLET STORES, INC.  
STOCKHOLDER LITIGATION

CONSOLIDATED  
C.A. No. 2019-0798-JTL

**AFFIDAVIT OF CYNTHIA STANISLAUS  
REGARDING MAILING OF NOTICE**

STATE OF WISCONSIN                    )  
  )    SS:  
COUNTY OF MILWAUKEE                )

Cynthia Stanislaus, being duly sworn, deposes and says:

1. I am a Project Manager of A.B. Data, Ltd.’s Class Action Administration Company (A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to the Granted Amended Scheduling Order With Respect to Notice and Settlement Hearing entered by the Court on September 16, 2025 (the “Scheduling Order”) (Transaction ID 77091006), A.B. Data was authorized to act as the Settlement Administrator in connection with the partial Settlement of the above-captioned action (the “Action”).<sup>1</sup> I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Amended Stipulation and Agreement of Compromise, Settlement, and Release Between The Primary Subclass Representatives and Defendants dated September 12, 2025 (the “Settlement Stipulation”) (Transaction ID 77071465).

set forth herein and, if called as a witness, could and would testify competently thereto.

### **MAILING OF THE NOTICE**

1. On September 12, 2025, the Settling Parties: Whitebark Value Partners LP and Keith Edquist (“Primary Subclass Representatives”), and Edward S. Lampert, ESL Investments, Inc., ESL Partners, LP, RBS Partners, LP, Transform Holdco LLC, and Hometown Midco LLC (the Defendants”) filed a Stipulation and Agreement of Compromise, Settlement, and Release between The Primary Subclass Representatives and Defendants (“the Stipulation”) (Transaction ID 77071465).

2. On September 16, 2025 the Court granted the parties’ Scheduling Order (Transaction ID 77091006). Pursuant to the Scheduling Order, on the dates and through the methods outlined below, A.B. Data mailed the Notice of Pendency of Stockholder Class Action and Proposed Settlement, Settlement Hearing, and Right to Appear (the “Notice”). On October 1, 2025, A.B. Data caused 4,298 Notices to be sent by first-class mail to each Primary Subclass Member at his, her or its last known address based on the records of A.B. Data, Ltd. collected in connection with the Partial Settlement. A copy of the Notice is attached hereto as Exhibit A.

3. As is typical in merger-related class actions, most potential Class Members are beneficial owners whose securities are held in “street name”—

*i.e.*, purchased and held by brokerage firms, banks, institutions, and other third-party nominees on the owners behalf. A.B. Data maintains a proprietary database of the largest and most common banks, brokers, and other nominees. At the time of the initial mailing, this database contained 4,894 mailing records. On October 1, 2025, A.B. Data sent by first-class mail Notices to all 4,894 mailing records contained in the Record Holder Mailing Database.

4. The Notice directed those brokerage firms, banks, and other persons or entities who held shares of Sears Hometown and Outlet Stores, Inc. common stock as record owners, but not as beneficial owners, to either: (a) within seven calendar days of receipt of this Notice request from A.B. Data, Ltd., sufficient copies of the Notice to forward to all beneficial owners and within seven calendar days of receipt of those Notices forward them to all such beneficial owners; or (b) within seven calendar days of receipt of this Notice, provide a list of the names and addresses, and if available, email addresses of all such beneficial owners to Sears Stockholder Settlement c/o A.B. Data, Ltd., P.O. Box 173025, Milwaukee, Wisconsin 53217-8091, after which A.B. Data sent copies of the Notice to such beneficial owners.

5. On October 1, 2025, A.B. Data also submitted the Notice to the Depository Trust Company (“DTC”) to post on their Legal Notice System, which

offers DTC member banks and brokers access to a comprehensive library of notices concerning DTC-eligible securities.

6. As of November 12, 2025 A.B. Data had received an additional 359 names and addresses of Primary Subclass Member from individuals or brokerage firms and other nominee holders. A.B. Data has also received requests from brokers and other nominee holders for 605 Notices to be forwarded by the nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

7. As of November 12, 2025 a total of 10,156 Notices have been mailed to Primary Subclass Members and their nominees. In addition, A.B. Data has re-mailed 842 Notices to persons whose original mailings were returned by the U.S. Postal Service (“USPS”) and for whom updated addresses were provided to A.B. Data by the USPS.

### **TELEPHONE HELP LINE**

8. On October 1, 2025, A.B. Data established a case-specific, toll-free telephone helpline, 1-877-388-1772, with an interactive voice response system and live operators, to accommodate potential Class Members with questions about the Action and the partial Settlement. The automated attendant presents callers with a series of choices to respond to basic questions. Callers requiring further help have

the option to be transferred to a live operator during business hours. A.B. Data continues to maintain this telephone helpline.

**SETTLEMENT WEBSITE**

9. On October 1, 2025, A.B. Data updated the Settlement website, www.SearsStockholderSettlement.com, providing crucial information about the Action and the proposed partial Settlement.

I state under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of November, 2025.



Cynthia Stanislaus

Sworn to and Subscribed before me  
this 13th day of November, 2025



Noah T. Fenner



Notarized online using audio-video communication

My Commission Expires: August 29, 2026