



**GRANTED**

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

IN RE MPM HOLDINGS INC.  
APPRAISAL AND STOCKHOLDER  
LITIGATION

C.A. No. 2019-0519-NAC

**[PROPOSED] ORDER GRANTING LEAD PLAINTIFF FRANK FUNDS'  
UNOPPOSED MOTION FOR ADMINISTRATIVE ORDER**

WHEREAS, the parties in the above-captioned action agreed to a Settlement reflected in the Stipulation and Agreement of Settlement, Compromise, and Release, dated November 17, 2023 (Trans. ID 71441441) (the “Stipulation”);

WHEREAS, the Stipulation describes a method for the distribution of the Net Settlement Fund to Eligible Class Members<sup>1</sup> (*see* Stipulation ¶II.2(b));

WHEREAS, the Court entered an Order and Final Judgment Approving Class Action Settlement on April 16, 2025 (Trans. ID 76080769);

WHEREAS, Lead Plaintiff has filed an Unopposed Motion for Administrative Order (“Motion”), seeking: (1) authorization for A.B. Data (the Settlement Administrator) to make an Initial Distribution of the Net Settlement Fund to former stockholders of MPM Holdings, Inc. (“MPM”) who are Eligible Class Members entitled to receive Settlement consideration; and (2) approval of payment from the Settlement Fund to the Settlement Administrator for Administrative Costs;

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms used in this Order shall have the same meaning as set forth in the Stipulation or the Ewashko Affidavit (defined below).

WHEREAS, in support of Lead Plaintiff’s Motion, Lead Plaintiff filed the Affidavit of Jack Ewashko in Support of Lead Plaintiff Frank Fund’s Unopposed Motion for Administrative Order (“Ewashko Affidavit”), describing: (1) the specific steps the Settlement Administrator plans to take in order to effect distribution of the Net Settlement Fund to Eligible Class Members, and (2) the Administrative Costs that A.B. Data incurred in providing notice to the Class and administering the Settlement;

IT IS HEREBY ORDERED, this \_\_\_ day of \_\_\_\_\_ 2026, that Lead Plaintiff’s Motion is GRANTED; and

1. The Settlement Administrator is directed to arrange for the distribution of the Net Settlement Fund to Eligible Class Members in the manner contemplated by the Stipulation and further described in the Motion and Ewashko Affidavit.

2. Payment of approximately \$114,700.40 from the Settlement Fund to A.B. Data for Administrative Costs incurred in connection with administering the Settlement is hereby authorized.

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Vice Chancellor Nathan A. Cook

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

**Court:** DE Court of Chancery Civil Action

**Judge:** Nathan A Cook

**File & Serve**

**Transaction ID:** 78681254

**Current Date:** Mar 24, 2026

**Case Number:** 2019-0519-NAC

**Case Name:** CLOSED 01/06/2026 CONF ORD ON DISC - CONS W/ 2019-0521-JTL, 2019-0565-JTL, 2020-0130-JTL - IN RE APPRAISAL OF MPM HOLDINGS INC. APPRAISAL AND STOCKHOLDER LITIGATION

**Court Authorizer:** Nathan A Cook

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/s/ Judge Nathan A Cook