



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

JAMES HARRIS AND THE
ESTATE OF ADAM
CHRISTOPHER VIGNOLA,
derivatively on behalf of FAT
BRANDS INC.,

Plaintiffs,

v.

SQUIRE JUNGER, JAMES
NEUHAUSER, EDWARD H. RENSI,
ANDREW A. WIEDERHORN, FOG
CUTTER HOLDINGS, LLC, and FOG
CUTTER CAPITAL GROUP, INC.,

Defendants,

-and-

FAT BRANDS INC., a Delaware
Corporation,

Nominal Defendant.

C.A. No. 2021-0511-NAC

JAMES HARRIS AND THE
ESTATE OF ADAM
CHRISTOPHER VIGNOLA,
derivatively on behalf of FAT
BRANDS INC.,

Plaintiffs,

v.

SQUIRE JUNGER, JAMES
NEUHAUSER, EDWARD H. RENSI,
ANDREW A. WIEDERHORN, FOG
CUTTER HOLDINGS, LLC, and FOG
CUTTER CAPITAL GROUP, INC.,

Defendants,

-and-

C.A. No. 2022-0254-NAC

FAT BRANDS INC., a Delaware
Corporation,

Nominal Defendant.

**REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF
PLAINTIFFS' APPLICATION FOR APPROVAL OF THE SETTLEMENT,
AN AWARD OF ATTORNEYS' FEES AND EXPENSES, AND
PLAINTIFFS' SERVICE AWARD**

On October 9, 2025, the Notice of Pendency of Settlement of Derivative Actions (the "Notice") was disseminated pursuant to, and in accordance with, the Scheduling Order approved by the Court on September 18, 2025.¹ In response to the Notice, *no objections* to the proposed Settlement or award of attorneys' fees and expenses have been filed with the Court or received by counsel for the parties to the above-captioned Actions. This further supports approval of the Settlement, and the requested award of attorneys' fees and expenses. *Spen v. Andrews Grp., Inc.*, 1992 WL 127512, at *1 (Del. Ch. June 5, 1992).

Because there is no opposition to the proposed Settlement or the requested award of attorneys' fees and expenses, Plaintiffs will not submit an extensive reply brief. Rather, for the reasons stated in Plaintiffs' Application for Approval of the Settlement, an Award of Attorneys' Fees and Expenses, and Plaintiffs' Service Award, Plaintiffs again respectfully request that the Court grant final approval of the

¹ Aff. Regarding Not. of Settlement, ¶¶3-7, Trans. ID 77838321 (Dec. 4, 2025).

proposed Settlement, the requested award of attorneys' fees and expenses, and the requested service awards.

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Case Details

Case Number

2021-0511-NAC

2022-0254-NAC

Case Name

STAYED 5-2-25/CONF/ James Harris v. Squire Junger

STAYED (2/7/2024) CONF ORDER James Harris v. Squire Junger