



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

In re: TRANSPERFECT GLOBAL, INC.	:	
	:	C.A. No. 9700-CM
	:	
ELIZABETH ELTING, Petitioner	:	
	:	
v.	:	
	:	
PHILIP SHawe and SHIRLEY SHawe,	:	
Respondents,	:	C.A. No. 10449-CM
	:	
and	:	
	:	
TRANSPERFECT GLOBAL, INC.,	:	
Nominal Respondent	:	
	:	

**TRANSPERFECT GLOBAL, INC.’S OPPOSITION TO ROBERT B.
PINCUS’S THIRD MOTION FOR AN ORDER HOLDING
TRANSPERFECT GLOBAL, INC. IN CONTEMPT**

TransPerfect Global, Inc. responds in opposition to Robert Pincus’s (“Pincus”) Third Motion for an Order Holding TransPerfect Global, Inc. in Contempt and represents:

INTRODUCTION

1. Pincus seeks to hold TransPerfect in contempt for not paying \$5,000,113.13 under this Court’s August 7, 2023 Letter Decision resolving the

January 2021-March 2023 fees (“Letter Decision”)¹ and August 16, 2023 Order implementing that decision² (“Order” and together “August 2023 Order”).

2. The August 2023 Order, coupled with this Court’s September 22, 2023 Letter Decision denying reargument³ (“Reargument Decision” and with the August 2023 Order, “Decisions”), denied TransPerfect any meaningful review of the exorbitant fees generated by Pincus and his law firms, overruling its objections without reviewing the objectionable fees,⁴ and then stating that TransPerfect cannot appeal this or any future fee award without forfeiting its right to object/appeal.⁵

3. With over \$417,000 in advanced fees for the Securities Action,⁶ Pincus should have had to, at least, execute an undertaking, as this Court acknowledged.⁷

¹ *In re TransPerfect Glob., Inc.*, 2023 WL 5017248 (Del.Ch. Aug. 7, 2023).

² *In re TransPerfect Global, Inc.*, 2023 WL 5302348 (Del.Ch. Aug. 16, 2023).

³ *In re TransPerfect Glob., Inc.*, 2023 WL 6387785, *2 (Del.Ch. Sept. 22, 2023)

⁴ *TransPerfect Glob., Inc.*, 2023 WL 5017248, *2; *see also TransPerfect*, 2023 WL 6387785, *2.

⁵ *TransPerfect*, 2023 WL 6387785, *2.

⁶ *See TransPerfect*, 2023 WL 5017248, *4 (“The fee petitions address advancement for a defendant's attorneys’ fees); *see also TransPerfect*, 2023 WL 6387785, *4.

⁷ *TransPerfect*, 2023 WL 6387785, n.32 citing *Carlson v. Hallinan*, 925 A.2d 506, 541 (Del.Ch.2006)(Holding that advancement requires “secur[ing] an undertaking in some form.”).

Yet this Court ruled that no undertaking was required⁸ even while stating that TransPerfect now supposedly has “claw back rights” for those fees.⁹

4. The Decisions effectively reversed what little protections TransPerfect won in 2019 when successfully avoiding contempt, including the right to review Pincus’s fee petitions and object the fees demanded. Now, Pincus and his law firms can again bill without restraint knowing all fees no matter how excessive will be rubber-stamped.

5. Since the Order was entered on August 16, TransPerfect has continuously sought to obtain clarification and ordinary appellate review. It twice sought to appeal the August 2023 Order, first as a collateral order then as an interlocutory order, while also moving for reargument/clarification and a stay pending appeal. The Contempt Motion would have been precluded if an appeal was accepted or a motion as granted. Further, the Court’s determination that TransPerfect can (theoretically) seek appellate review at some indeterminate future time – albeit subject to improper conditions – means holding TransPerfect in contempt despite the August 2023 Order, on which the purported contempt is based, may be remanded for more meaningful review or a reduction in fees awarded.

⁸ *TransPerfect*, 2023 WL 6387785, *1.

⁹ *Id.*, *4.

6. It would be inequitable to punish TransPerfect by holding it in contempt for seeking to have the denial of such fundamental rights reviewed. Therefore, the Court should deny the Contempt Motion, or, alternatively, undo this Court's denial of due process and the right to appeal and allow TransPerfect's objections to be considered on appeal before considering the contempt motion. Otherwise, TransPerfect will have no choice but to seek federal intervention to seek redress of the ongoing denial of its due process rights and right to appeal.

7. Further, as set forth below, the Contempt Motion improperly focuses on irrelevant past conduct, most not even undertaken by TransPerfect. Furthermore, no basis exists for a \$50,000 daily fine, which is clearly punitive, not coercive. Pincus also misleads this Court regarding post-judgment interest, which alone confirms it must not be imposed here.

BACKGROUND

8. TransPerfect objected to the relevant fees petitions as excessive, improper, and unsupportable on multiple grounds, ("General Objections") and objected specifically to the fees advanced for the Securities Action ("Securities Fees") based on federal law prohibiting indemnification for securities fraud and constitutional grounds ("Securities Objections").¹⁰ TransPerfect also requested that

¹⁰ See TransPerfect's objections to January 2021-March 2023 fee petitions.

a mechanism to ensure Pincus, if found liable, repays the advanced Securities Fees be installed.

9. The Letter Decision overruled all objections and awarded Pincus all fees requested, including the advanced Securities Fees.¹¹ It rejected the General Objections solely because similar objections to pre-2021 fees had been overruled¹² in an earlier decision¹³ while finding that TransPerfect’s cited authority was distinguishable and did not provide “that court-ordered advancement or indemnification are categorically unconstitutional” to overrule the Securities Objections.¹⁴

10. Despite identifying the Securities Fees as “advancement,”¹⁵ the Letter Decision rejected TransPerfect’s request for a mechanism to ensure that Pincus repaid the advanced Securities Fees because “the Orders do not require ... a bond.”¹⁶

11. The unchecked approval of the Securities Fees as “advancement” is particularly egregious in light of the serious nature of the allegations, raising

¹¹ See *TransPerfect*, 2023 WL 5017248; *TransPerfect*, 2023 WL 5302348.

¹² See *TransPerfect*, 2023 WL 5017248, *2-3; *5-6.

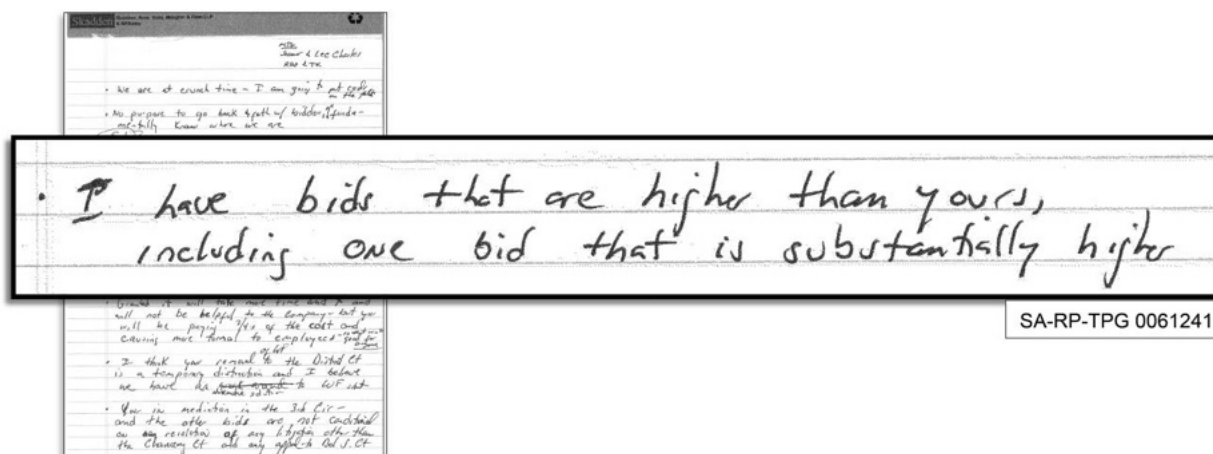
¹³ See *In re TransPerfect Glob., Inc.*, 2021 WL 1711797, *2 (Del.Ch.Apr. 30, 2021) (“April 2021 Opinion”).

¹⁴ See TransPerfect’s objections to January 2021-March 2023 fee petitions.

¹⁵ *Id.*

¹⁶ *TransPerfect*, 2023 WL 5017248, *4; see also *id.*, n.1 (defining “Orders”).

substantial claims concerning the conduct of Pincus in the auction process, which alleges he lied to Phil Shawe in order to induce Shawe to increase his bid by millions of dollars, which is documented in Pincus's own handwriting:



See **Exhibit A**. The Court improperly awarded these fees, and is now being asked to force TransPerfect to pay, with no meaningful review, upon threat of contempt.

12. Unlike the April 2021 Opinion, the August 2023 Order was silent regarding finality and appealability.¹⁷

13. On August 21, 2023, TransPerfect sought reargument regarding the objections and clarification regarding (i) the August 2023 Order's finality and (ii) whether the Securities Fees' payment constituted advancement or unconditional indemnification.¹⁸

¹⁷ See *TransPerfect*, 2023 WL 5017248; *TransPerfect*, 2023 WL 5302348.

¹⁸ Dkt.1767.

14. TransPerfect also timely filed a notice of appeal from the August 2023 Order under the collateral order doctrine (September 15, 2023) (“Collateral Appeal”) then a notice of interlocutory appeal from the Decisions (October 20, 2023) and moved the Delaware Supreme Court for a stay (September 29, 2023). The Contempt Motion would have been precluded by acceptance of either appeal or granting of the stay motion.

15. The September 22, 2023 Reargument Decision denied reargument,¹⁹ explaining this Court had “carefully reviewed” the General Objections that “regurgitated old [rejected] arguments,” so it need not consider them regarding the January 2021-March 2023.²⁰

16. The Reargument Decision stated the August 2023 Order was interlocutory, but then decreed that “TransPerfect will be able to appeal the court’s orders once it has ceased creating fee-generating work for Pincus,”²¹ meaning no appeal without forfeiting its right to object. Note that but for this Court universally awarding fees for opposing TransPerfect’s objections (fees on fees),²² thus

¹⁹ See *TransPerfect*, 2023 WL 6387785.

²⁰ Dkt.1779, pp.3-4.

²¹ *TransPerfect*, 2023 WL 6387785 at *2.

²² Fees on fees are awarded “when a plaintiff successfully shows an entitlement to advancement wrongfully withheld by the defendant corporation.” *Mooney v. Echo Therapeutics, Inc.*, 2015 WL 3413272, at *12 (Del.Ch. May 28, 2015); see also *Fasciana v. Elec. Data Sys. Corp.*, 829 A.2d 178, 181 n. 13 (Del.Ch. July 1, 2003) (“‘Fees on fees’ ...

incentivizing Pincus to seek objectionable fees, TransPerfect would create no “fee-generating work.”

17. The Reargument Decision further impeded TransPerfect’s right to appeal by improperly attributing it with the “fee-generating work” for the Securities Action initiated by TransPerfect Holdings, LLC (“Holdings”),²³ a separate legal entity over which TransPerfect has no control, and thus disregarding TransPerfect’s separate legal existence.²⁴

18. Since this Court has also awarded Pincus fees for opposing appeals,²⁵ TransPerfect must also forfeit its appellate rights for future fees to appeal the January

refers to an award of litigation expenses ... incurred in the process of obtaining another award of litigation expenses pursuant to some statutory or contractual authority.”)(citation omitted).

By objecting to Pincus’s fees, TransPerfect is not wrongfully withholding advancement. And only the Securities Fees constitute advancement. Therefore, it is not clear why Pincus is entitled to his fees for opposing the objections—fees on fees—for to the Securities Fees, let alone fees on fees for all fees.

²³ *TransPerfect Holdings, LLC v. Pincus et al.*; C.A. No. 22-1477-RGA.

²⁴ See *TransPerfect*, 2023 WL 6387785, *4 (“TransPerfect’s arguments ... rest on the misguided notion that *it* would not have claw back rights in the event *it* prevails in the [Securities Action].”)(emphasis added).

²⁵ The August 2023 Order awarded Pincus fees for opposing TransPerfect’s appeal of the April 2021 Opinion without the Supreme Court finding TransPerfect’s appeal was “manifestly without merit.” *Smith v. Francisco*, 781 A.2d 695 (Del.2001)(Table)(“But the norm remains the American Rule, and being the losing party, without more, should not result in an award of attorneys’ fees.”). And this Court “lacks authority to award expenses incurred on appeal on the theory that the appeal was frivolous, absent some direction by

2021-2023 fees, violating due process and punishing TransPerfect for exercising its rights while further enriching Pincus and his lawyers.

19. Although omitting to clarify whether the Securities Fees’ payment constituted advancement or unconditional indemnification,²⁶ the Reargument Decision ruled, contrary to prior decisions, that TransPerfect has “claw back rights in the event [Holdings] prevails in the [Securities Action],”²⁷ but, inconsistently, held Pincus need not execute undertaking²⁸ contrary to Delaware law.²⁹

20. The Reargument Decision held that TransPerfect cannot appeal the August 2023 Order, any future fee awards, or this Court’s finding that its orders supersede federal law, unless (1) TransPerfect forfeits its rights to object to *and appeal* post-March 2023 fees, and (2) the Securities Action concludes (mooting appealable issues).

21. On September 29, 2023, TransPerfect moved the Supreme Court to stay execution on the August 2023 Order pending the Collateral Appeal.

the Delaware Supreme Court to undertake that task.” *Marilyn Abrams Living Tr. v. Pope Investments LLC*, 188 A.3d 829, 832 (Del.Ch.2018).

²⁶ See *TransPerfect*, 2023 WL 6387785.

²⁷ *Id.*, p.4.

²⁸ *Id.*

²⁹ See *Carlson*, 925 A.2d at 541.

22. On October 6, 2023, TransPerfect applied for certification for an interlocutory appeal from the Decisions (“Application”) because they decided substantial issues of material importance, including denying TransPerfect due process, requiring the forfeiture of its objection rights, and precluding review of this Court’s findings conflicting with federal law until moot and the conflicting Reargument Decision and Letter Decision (and the Orders).³⁰ Also, the Decisions issues involved questions of law to be resolved for the first time and related to constitutionality, and their review will serve considerations of justice.³¹

ARGUMENT

23. Besides the constitutional grounds raised, Pincus’s failure to satisfy his burden to establish contempt and the propriety of the requested sanctions supports denying the Contempt Motion.

I. Contempt Standards.

24. “A cardinal requirement for any adjudication of contempt is that the order allegedly violated give clear notice of the conduct being proscribed.”³²

³⁰ See Dkt.1782.

³¹ See *id.*

³² *Mother Afr. Union First Colored Methodist Protestant Church v. Conf. of Afr. Union First Colored Methodist Protestant Church*, 1992 WL 83518, *9 (Del.Ch. Apr. 22, 1992).

“However, the violation ‘must not be a mere technical one, but must constitute a failure to obey the Court in a meaningful way.’”³³

25. “To establish civil contempt, [movant] must demonstrate that [non-movant] violated an order of the court of which they had notice and by which they were bound.”³⁴

26. “Contempt sanctions ‘may be imposed in an ordinary civil proceeding upon notice and an opportunity to be heard.’”³⁵ However, “[t]he decision whether to impose sanctions, upon whom to impose them, and what sanctions to impose, will depend upon the facts and circumstances of each particular case, but it should always be viewed in light of the proper function which sanctions are intended to serve.”³⁶

27. Despite, this Court having “broad discretion when formulating a remedy for contempt,”³⁷ that discretion is not without limits. Any sanction must be

³³ *Gandhi-Kapoor v. Hone Capital LLC*, 2023 WL 4628782, *8 (Del.Ch. July 19, 2023)(citation omitted).

³⁴ *Id.* (citation omitted).

³⁵ *DiSabatino v. Salicete*, 671 A.2d 1344, 1349 (Del.1996)(citations omitted).

³⁶ *In re Coinmint, LLC*, 2020 WL 5912596, *4 (Del.Ch.Oct. 2, 2020)(citations omitted).

³⁷ *Gandhi-Kapoor*, 2023 WL 4628782, *8 (citations omitted); *Israel Disc. Bank of N.Y. v. First State Depository Co. LLC*, 2012 WL 1021180, *3 (Del.Ch.Mar. 19, 2012).

“just and reasonable,”³⁸ and when imposing coercive sanctions, this Court must “use the least possible power adequate to the end proposed.”³⁹

II. Past conduct and irrelevant assertions cannot establish contempt.

28. Pincus focuses on assertions, such as “Philip Shawe [being] an unquestionable controller of TransPerfect’s conduct.”⁴⁰ Not only has this not been found but is irrelevant regarding contempt.

29. Pincus, like this Court,⁴¹ consistently disregards TransPerfect’s separate legal existence to attribute it with Shawe’s alleged acts.⁴² to the actions of TransPerfect that Pincus raises are past acts unrelated to the alleged contempt.⁴³ By doing so, Pincus seeks punitive, not coercive, sanctions.⁴⁴

³⁸ *Gandhi-Kapoor*, 2023 WL 4628782, *8(citation omitted).

³⁹ *Coinmint*, 2020 WL 5912596, *4 (citations omitted).

⁴⁰ Dkt.1780, ¶4.

⁴¹ *See TransPerfect*, 2023 WL 6387785, *4.

⁴² *See* Dkt.1780, ¶4; *see also TransPerfect*, 2021 WL 1711797, *27(“Shawe chose to go to battle with the Custodian rather than to cooperate during the wind-up process—acting in contempt of court, filing baseless motions and appeals.”); Dkt.1780, ¶5(citing *TransPerfect*, 2021 WL 1711797, *4-8; *see also id.*(No actions by TransPerfect); Dkt.1780, ¶5(citing *TransPerfect*, 2021 WL 1711797, *36-41); *see also id.*, *36(noting that TransPerfect was not held in contempt for not making payments under earlier fee orders)(citation omitted); Dkt.1780, ¶5 *citing TransPerfect*, 2021 WL 1711797, *6,17,25; *see also id.*(Shawe’s past actions only).

⁴³ *See Contempt Motion*, ¶¶1;9;10.

⁴⁴ *See Crumplar v. Superior Court ex rel. New Castle Cnty.*, 56 A.3d 1000, 1011 (Del.2012)(A “contempt finding was criminal, not civil, and therefore justified more

30. TransPerfect cannot be held in contempt for its past acts or Shawe's acts/conduct. It would amount to manifest injustice to hold TransPerfect in contempt while it is being denied due process by awarding fees (including fees on fees) without review and deprived of the rights to appeal/object future fees and the right to appeal rulings conflicting with federal and Delaware law until such issues are moot.

III. The proposed \$50,000 *per diem* fine is arbitrary and punitive.

31. Pincus's motivations in pursuing the contempt motion are evident from his demand for a "*per diem* sanction of \$50,000,"⁴⁵ which is arbitrary, unreasonable, and unjust.⁴⁶ Pincus fails to explain how such a sanction "is coercive or remedial in nature."⁴⁷

32. Pincus's requested sanction clearly is an attempt to punish Shawe through TransPerfect for his many disputes/confrontations with Shawe earlier in this litigation (*i.e.*, Shawe's past acts). Punitive sanctions are improper for civil contempt (even when not based on another party's conduct), and "would mandate[] heightened

procedural protections, because the sanction was intended to punish past conduct and could not be avoided through compliance with the court's order.").

⁴⁵ Contempt Motion, ¶¶6, 39.

⁴⁶ See *Aveta Inc. v. Bengoa*, 986 A.2d 1166, 1188 (Del.Ch.2009).

⁴⁷ *Mother African*, 1992 WL 83518, *6.

procedural protections,” including a jury trial.⁴⁸ Even if not punitive, the requested sanction still must be denied.

33. Although this Court “has previously used daily fines to coerce compliance with its orders,”⁴⁹ such fines must “not be out of reason,”⁵⁰ and it must “use *the least possible power* adequate to the end proposed.”⁵¹ Pincus provides no explanation for how the \$50,000 daily fine is “tailored to the specific violation.”⁵²

34. This Court cannot simply pull an amount out of thin air to craft a *per diem* sanction, as Pincus did.⁵³ As this Court recognized, more information may be necessary to refine a subsequent sanction.⁵⁴ Pincus, without providing such information, simply increased the (also arbitrary) prior sanction by \$20,000.

⁴⁸ *Crumplar*, 56 A.3d at 1011.

⁴⁹ *Gandhi-Kapoor*, 2023 WL 4628782, *10 (citations omitted).

⁵⁰ *New Castle Cnty. Bd. of Educ. v. New Castle Cnty. Educ. Ass'n*, 1978 WL 171758, *1 (Del.Ch.Oct. 25, 1978).

⁵¹ *TR Investors, LLC v. Genger*, 2009 WL 4696062, *18 n.74 (Del.Ch.Dec. 9, 2009) (citation omitted) (emphasis added).

⁵² *Coinmint*, 2020 WL 5912596, *4 (citations omitted).

⁵³ *Gandhi-Kapoor*, 2023 WL 4628782, *10.

⁵⁴ *Matter of Indem. Ins. Corp.*, 2014 WL 31710, *7 (Del.Ch.Jan. 2, 2014)(“The court also authorized discovery ... so that more refined sanctions could be imposed.”).

Therefore, this Court rubberstamping the requested sanction would be both unjust and unreasonable.⁵⁵

IV. Pincus has no right to post-judgment interest.

35. Pincus requests post-judgment interest on the fees awarded by the August 2023 Order, citing *Moffitt v. Carroll*⁵⁶ and *ReCor Med. v. Warnking* as support.⁵⁷ In both cases, post-judgment interest was awarded on final judgments,⁵⁸ which, as this Court has very clearly found, the August 2023 Order is not.

36. To avoid that issue, Pincus intentionally misleads this Court by stating that *ReCor* “award[ed] post-judgment ‘interest, compounded quarterly, on a fee award.’”⁵⁹ He, however, omits the context of the post-judgment interest there, which was imposed on fees awarded under an agreement’s prevailing party clause *as a final judgment*.⁶⁰

⁵⁵ *Aveta*, 986 A.2d at 1188.

⁵⁶ 640 A.2d 169 (Del.1994).

⁵⁷ 2015 WL 535626 (Del.Ch.Jan. 30, 2015)

⁵⁸ See *Moffitt*, 640 A.2d at 171-172; *Recor Medical, Inc. v. Warnking*, 2015 WL 430408 (Del.Ch.Jan. 30, 2015).

⁵⁹ Dkt.1780, ¶7 (quoting *ReCor*, 2015 WL 535626, *1).

⁶⁰ *ReCor Med., Inc. v. Warnking*, 2014 WL 5317768, *1 (Del.Ch.Oct. 15, 2014).

37. Here, this Court ruled the August 2023 Order is interlocutory and denied TransPerfect's request that it be entered as a partial final judgment.⁶¹ Pincus has cited no instances of a Delaware court awarding post-judgment interest as a sanction or otherwise for a litigant's failure to pay fees awarded. Pincus's attempt to mislead this Court as to post-judgment interest serves only to underscore that he is not entitled to post-judgment interest on the fees awarded by the August 2023 Order. Doing so here, as a sanction for TransPerfect's alleged contempt or otherwise, would be punitive making the contempt remedy criminal rather civil.⁶² Therefore, post-judgment interest must not be awarded.

CONCLUSION

TransPerfect requests the Contempt Motion be denied without imposition of monetary sanctions or post-judgment interest or, alternatively, held in abeyance until the decision and due process denials can be reviewed.

Date: October 31, 2023

OFFIT KURMAN, P.A.

/s/ Frank E. Noyes, II
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⁶¹ See *TransPerfect*, 2023 WL 6387785.

⁶² *Gandhi-Kapoor*, 2023 WL 4628782, *8 (citations omitted).

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CERTIFICATE OF SERVICE

The undersigned counsel for TransPerfect Global, Inc. certifies that a true and correct copy of *TransPerfect Global, Inc.'s Opposition to Robert B. Pincus's Third Motion for an Order Holding TransPerfect Global, Inc. in Contempt* was served on the following, on October 31, 2023, via File & ServeXpress:

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Transaction Details

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10449-CM	APPEAL NTSC 9.26.2023/CONF ORD Elting, Elizabeth vs Philip R Shawe et al



EXHIBIT A



Exhibit

P-RP 50

4/29/2021

Robert Pincus

MTG

Shaw & Lee Charles

RBP & TK

- We are at crunch time - I am going to put code on the file

- No purpose to go back & forth w/ bidder, ^{we} fundamentally know where we are

- ^{First,} I have a duty to maximize value

- I have bids that are higher than yours, including one bid that is substantially higher

However, I understand your bid brings certainty and allows this saga to be done - I attach value to that, although likely less than you do

- ~~My rationale is~~ I think that if I ^{select} pick a bid substantially higher than yours - with an abuse of discretion theory - I will prevail

- Granted it will take more time and \$ and will not be helpful to the company - but you will be paying $\frac{3}{4}$ s of the cost and causing more turmoil to employees - ^{so that won't be good for anyone}

- I think your removal ^{of WF} to the District Ct is a temporary distraction and I believe we have an ~~work around~~ ^{alternative solution} to WF ^{side}

- Your in mediation in the 3rd Cir - and the other bids are not conditioned on ~~any~~ resolution of any litigation other than the Chancery Ct and any appeal to Del S. Ct

- So that leaves ^{us} ~~the~~ with 3 options

- Sell to you and end the dispute - Not clear what Liz will do

- Sell to a higher bidder and fight for the next six months

have been advised

- or if you are willing to cooperate, sell to the highest bidder likely for more \$ without ~~substantiated~~ ^{substantiated} restrictions on you - I ~~think~~ ^{understand} that's not acceptable to you

what they would advise
do at this time in process

BANKERS WANT TO DO ONE FINAL SEALED BID ROUND TO PICK THE HIGHEST & BEST BUT I have resisted because I think offering to sell the company to you at a ~~max~~ price that I can get comfortable - with all the other provisions you have offered - is value maximizing

- In that vein, we are ~~willing~~ ^{value} to sell the company to you for ~~\$745~~ ^{\$770} that was close to your third round bid, before your bankers told us you were worried about the departures of key employees & you know my view of those resignations - on same terms we discuss w/ Lee

~~that's the best offer~~
That's only \$25 million more that what I understand you are, if you don't buy your mom's shares now -

- I understand that Liz may object, but I think @ that price and with the market test that we had and she will agree that your actions have put you in the position to buy the Company, but the Chancellor specifies per the you to bid ~~and~~ so I have to play the hand I am dealt

Keep Coordinated app'm
re rollers

Combat Ceth

* Supporting documentation

Hepp.

- ability to move quickly
- existing, CPs got 100% allocation
- CO = invest

Hepp

close
\$ 7.5 m sanctions - credited

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Court: DE Court of Chancery Civil Action **Document Type:** Exhibits

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