

SUPPLEMENTAL INFORMATION PURSUANT TO RULE 3(A)
OF THE RULES OF THE COURT OF CHANCERY

EFiled: Apr 03 2025 09:49AM EDT
Transaction ID 75960361
Case No. 2025-0354-



The information contained herein is for the use by the Court for statistical and administrative purposes. Nothing in this document shall be deemed binding for purposes of the merits of the case.

1. Case caption: *Plumbers & Fitters Local 295 Pension Fund v. Dropbox, Inc., Andrew W. Houston, Donald W. Blair, Lisa Campbell, Paul E. Jacobs, Sara Mathew, Abhay Parasnis, Karen Peacock, Michael Seibel and Andrew Moore*

2. Date filed: April 3, 2025

3. Name and address of counsel for plaintiff(s):

PRICKETT, JONES & ELLIOTT, P.A.

Michael Hanrahan (#941)

Corinne Elise Amato (#4982)

Eric J. Juray (#5765)

Stacey A. Greenspan (#7056)

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4. Short statement and nature of claim(s) asserted: Individual and class action alleging breaches of fiduciary duty and seeking a declaration that 8 *Del. C.* § 144 is unconstitutional.

5. Substantive field of law involved (check one):

☐ Administrative law

☐ Labor law

☐ Trusts, Wills and Estates

☐ Commercial law

☐ Real Property

☐ Consent trust petitions

☐ Constitutional law

☐ 348 Deed Restriction

☐ Partition

☒ Corporation law

☐ Zoning

☐ Rapid Arbitration (Rules 96,97)

☐ Trade secrets/trade mark/or other intellectual property

☐ Other

6. Identify any related cases, including any Register of Wills matter. This question is intended to promote jurisdiction efficiency by assigning cases involving similar parties or issues to a single judicial officer. By signing this form, an attorney represents that the attorney has done reasonable diligence sufficient to respond to this question. *Plumbers & Fitters Local 295 Pension Fund v. Dropbox, Inc.*, C.A. No. 2025-0215-SEM.

7. State all bases for the court's exercise of subject matter jurisdiction by citing to the relevant statute. Specify if 8 *Del. C.* § 111, 6 *Del. C.* § 17-111, or 6 *Del. C.* § 18-111. State if the case seeks monetary relief, even if secondarily or in the alternative, under a merger agreement, asset purchase agreement, or equity purchase agreement. 10 *Del. C.* § 341

8. If the complaint initiates a summary proceeding under Sections 8 *Del. C.* §§ 145(k), 205, 211(c), 220, or comparable statutes, check here _____. (If #8 is checked, you must either (i) file a motion to expedite with a proposed form of order identifying the schedule requested or (ii) submit a letter stating that you do not seek an expedited schedule and the reason(s)—e.g., you have filed to preserve standing and do not seek immediate relief.) N/A.

9. If the complaint is accompanied by a request for a temporary restraining order, a preliminary injunction, a status quo order, or expedited proceedings other than in a summary proceeding, check here _____. (If #9 is checked, a motion to expedite must accompany the transaction with a proposed form of order identifying the schedule requested.) N/A.

10. If counsel believe that the case should not be assigned to a Master in the first instance, check here and attach a statement of good cause. X

/s/ Michael Hanrahan
Michael Hanrahan (#941)

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

PLUMBERS & FITTERS LOCAL	)	
295 PENSION FUND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 2025-
	)	
DROPBOX, INC., ANDREW W.	)	
HOUSTON, DONALD W. BLAIR,	)	
LISA CAMPBELL, PAUL E.	)	
JACOBS, SARA MATHEW,	)	
ABHAY PARASNIS, KAREN	)	
PEACOCK, MICHAEL SEIBEL,	)	
and ANDREW MOORE,	)	
	)	
Defendants.	)	

STATEMENT OF GOOD CAUSE

The undersigned counsel has reviewed the Verified Complaint and does not believe this action is suitable for assignment to a Magistrate in Chancery. Plaintiff seeks a declaration that amendments to 8 *Del. C.* § 144, signed into law on March 26, 2025, are unconstitutional under Delaware’s Constitution. Plaintiff also seeks relief for Defendants’ breaches of fiduciary duty related to an effort to reincorporate. Thus, counsel believes that this action should proceed directly before the Chancellor or a Vice Chancellor of this Court.

PRICKETT, JONES & ELLIOTT, P.A.

/s/ Michael Hanrahan

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Dated: April 3, 2025