

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SCOTT SCHWARTZ, Individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

LATCH, INC., LUKE SCHOENFELDER,
ROBERT J. SPEYER, PAUL A. GALIANO,
JENNY WONG, JOSHUA KAZAM,
JENNIFER RUBIO, NED SEGAL,
MICHELANGELO VOLPI, PETER
CAMPBELL, TRICIA HAN, RAJU RISHI, J.
ALLEN SMITH, and ANDREW SUGRUE,

Defendants.

Civil Action No. 1:23-cv-00027-WCB

CLASS ACTION

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a member of the Settlement Class based on your claims in the action entitled *Schwartz v. Latch, Inc., et al*, Case No. 1:23-cv-00027-WCB (D.C. Del.) (the “Action”), you must complete and, on page 5 below, sign this Proof of Claim and Release form (“Claim Form”). If you fail to submit a timely and properly addressed (as explained in paragraph 3 below) Claim Form, your Claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed Settlement.

2. Submission of this Claim Form, however, does not guarantee that you will share in the proceeds of the Settlement of the Action.

3. THIS CLAIM FORM MUST BE SUBMITTED ONLINE AT WWW.RG2CLAIMS.COM/LEGACYLATCH.HTML NO LATER THAN NOVEMBER 10, 2025, OR, IF MAILED, BE POSTMARKED NO LATER THAN NOVEMBER 10, 2025, ADDRESSED AS FOLLOWS: P.O. BOX 59479, PHILADELPHIA PA 19702-9479.

4. If you are a member of the Settlement Class and you do not timely and validly request exclusion in response to the Notice dated September 10, 2025, you are bound by the terms of any judgment entered in the Action, including the releases provided therein, **WHETHER OR NOT YOU SUBMIT A CLAIM FORM OR RECEIVE A PAYMENT.**

II. CLAIMANT IDENTIFICATION

1. You are a member of the Settlement Class if you were a stockholder of pre-merger Latch, Inc. (“Legacy Latch”) and purchased or otherwise acquired Latch, Inc. (“Latch”) common stock pursuant to Latch’s registration statement filed in connection with its June 4, 2021 merger with TS Innovation Acquisitions, Inc. (“TSIA”) (the “Pre-Merger Registration Statement”) and were allegedly damaged thereby. This includes exercises of options of Legacy Latch shares that

converted to post-Merger Latch stock pursuant to Latch's merger with TSIA. If you held the common stock in your name, you are the beneficial owner as well as the record owner. If, however, you purchased or otherwise acquired Latch common stock pursuant to the Pre-Merger Registration Statement through a third party, such as a brokerage firm, you are the beneficial owner and the third party is the record owner.

2. Use **Part A** of this form entitled "Claimant Information" to identify each beneficial owner of Latch common stock that form the basis of this claim, as well as the owner of record if different. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNERS OR THE LEGAL REPRESENTATIVE OF SUCH OWNERS.**

3. All joint owners must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

III. IDENTIFICATION OF TRANSACTIONS

1. Use **Part B** of this form entitled "Schedule of Transactions in Latch Common Stock" to supply all required details of your transaction(s) in Latch common stock. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

2. On the schedule, provide all of the requested information with respect to your holdings, purchases, acquisitions, and sales of Latch common stock, whether the transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim.

3. The date of covering a "short sale" is deemed to be the date of purchase of Latch common stock. The date of a "short sale" is deemed to be the date of sale of Latch common stock.

4. List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

5. Copies of broker confirmations or other documentation of your transactions must be attached to your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim. **THE PARTIES DO NOT HAVE INFORMATION ABOUT YOUR TRANSACTIONS IN LATCH COMMON STOCK.**

6. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All Claimants **MUST** submit a Claim Form whether or not they also submit information regarding their transactions and/or holdings in Latch common stock in electronic files. If you wish to file your transactions in electronic files, contact the Claims Administrator toll-free at 1-866-742-4955 or by email at info@rg2claims.com to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

PART A – CLAIMANT INFORMATION

The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you **MUST** notify the Claims Administrator in writing at the address above. Complete names of all persons and entities must be provided.

Beneficial Owner's First Name

M.I.

Beneficial Owner's Last Name

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Co-Beneficial Owner's First Name

M.I.

Co-Beneficial Owner's Last Name

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Entity Name (if claimant is not an individual)

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Representative or Custodian Name (if different from Beneficial Owner(s) listed above)

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Address1 (street name and number)

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Address2 (apartment, unit, or box number)

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City

State ZIP/Postal Code

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Foreign Country (only if not USA) Foreign Country (only if not USA)

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Social Security Number

Taxpayer Identification Number

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OR

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Telephone Number (home)

Telephone Number (work)

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Email address

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Account Number (if filing for multiple accounts, file a separate Claim Form for each account)

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Claimant Account Type (check appropriate box):

☐ Individual (includes joint owner accounts)

☐ Pension Plan

☐ Trust

☐ Corporation

☐ Estate

☐ IRA/401K

☐ Other _____ (please specify)

PART B: TRANSACTIONS IN LATCH COMMON STOCK

Purchases or acquisitions of Latch common stock pursuant to the Pre-Merger Registration Statement (prior to or up to June 4, 2021), including exercise of options of pre-Merger Latch, Inc. shares:

Trade Date(s) Month Day Year (List chronologically)	Number of Shares Purchased or Acquired	Proof of Purchase/ Acquisition Enclosed
1. ____/____/____	1. _____	<input type="checkbox"/> Y <input type="checkbox"/> N
2. ____/____/____	2. _____	<input type="checkbox"/> Y <input type="checkbox"/> N
3. ____/____/____	3. _____	<input type="checkbox"/> Y <input type="checkbox"/> N

Sales of Latch common stock (on or after June 4, 2021 to January 10, 2023, inclusive):

Trade Date Month Day Year	Number of Shares Sold	Total Sales Price (Excluding commissions, taxes and fees)	Proof of Sale Enclosed
1. ____/____/____	1. _____	1. _____.	<input type="checkbox"/> Y <input type="checkbox"/> N
2. ____/____/____	2. _____	2. _____.	<input type="checkbox"/> Y <input type="checkbox"/> N
3. ____/____/____	3. _____	3. _____.	<input type="checkbox"/> Y <input type="checkbox"/> N

Number of shares of Latch common stock held at the close of trading on January 10, 2023: _____

Proof of Position Enclosed: ☐ Yes ☐ No

IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

By signing and submitting this Claim Form, the Claimant(s) or the person(s) acting on behalf of the Claimant(s) certify(ies) that: I (We) submit this Claim Form under the terms of the Stipulation described in the accompanying Notice. I (We) also submit to the jurisdiction of the United States District Court for the District of Delaware (the "Court") with respect to my (our) claim as a Settlement Class Member(s) and for purposes of enforcing the releases set forth herein. I (We) further acknowledge that I (we) will be bound by the terms of any judgment entered in connection with the Settlement in the Action, including the releases set forth therein. I (We) agree to furnish additional information to the Claims Administrator to support this claim, such as additional documentation for transactions in eligible Latch common stock, if required to do so. I (We) have not submitted any other claim covering the same transactions in Latch common stock and know of no other person having done so on my (our) behalf.

V. RELEASES, WARRANTIES, AND CERTIFICATION

1. I (We) hereby warrant and represent that I am (we are) a Settlement Class Member as defined in the Notice, that I am (we are) not excluded from the Settlement Class, that I am (we are) not one of the “Defendant Releasees” as defined in the accompanying Notice.

2. As a Settlement Class Member, I (we) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever settle, release, and discharge with prejudice the Released Plaintiff Claims as to each and all of the Defendant Releasees (as these terms are defined in the accompanying Notice). This release shall be of no force or effect unless and until the Court approves the Settlement and it becomes effective on the Effective Date.

3. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

4. I (We) hereby warrant and represent that I (we) have included information about all of my (our) purchases, acquisitions and sales of Latch common stock and the number of shares held by me (us), to the extent requested

5. I (We) certify that I am (we are) NOT subject to backup tax withholding. (If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the prior sentence.)

I declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied on this Claim Form by the undersigned is true and correct.

Executed this _____ day of _____, in _____, _____
(Month / Year) (City) (State/Country)

Signature of Claimant

Signature of Joint Claimant, if any

Print Name of Claimant

Print Name of Joint Claimant, if any

(Capacity of person(s) signing, *e.g.*, Beneficial Purchaser, Executor or Administrator)

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.

REMINDER CHECKLIST:

1. Please sign this Claim Form.
2. DO NOT HIGHLIGHT THE CLAIM FORM OR YOUR SUPPORTING DOCUMENTATION.
3. Attach only copies of supporting documentation as these documents will not be returned to you.
4. Keep a copy of your Proof of Claim for your records.
5. If you move after submitting this Claim Form please notify the Claims Administrator of the change in your address, otherwise you may not receive additional notices or payment.