



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE ARCHER AVIATION INC.
STOCKHOLDER LITIGATION

CONSOLIDATED
C.A. No. 2024-0527-LWW

**AFFIDAVIT OF EITAN KIMELMAN IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF NEW YORK

: SS

COUNTY OF NEW YORK

I, Eitan Kimelman, being duly sworn, depose and say:

1. I am a Partner with Brontstein, Gerwitz & Grossman, LLC ("BG&G") and a member of good standing of the New York Bar Bar. I am submitting this affidavit in support of an award of attorneys' fees and expenses incurred in connection with services rendered in the above-captioned action (the "Action").

2. BG&G served as Additional Counsel on behalf of plaintiffs in this action and took on this representation on a fully contingent basis.

3. The information in this Affidavit regarding BG&G's time and expenses is taken from time and expense records maintained by the firm in the ordinary course of business. I reviewed my firm's time and expense entries in connection with the preparation of this affidavit. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness for, the time and expenses committed to the litigation. As part of this review, I removed certain

time entries for attorneys and paralegals who contributed de minimus time to this Action. I believe that the time reflected in my resulting lodestar calculation and the expenses for which payment is sought as set forth in this affidavit are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the adjustments for de minimus timekeeper entries described above, the attorneys and paralegals at my firm dedicated 15.3 hours from inception through June 5, 2026 (the day the parties reached an agreement-in-principle to settle the Action) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$16,905.00, based on the firm's current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the hours and lodestar is as follows:

TIMEKEEPER	TOTAL HOURS THROUGH 6/5/2026	RATE	TOTAL LODESTAR THROUGH 6/5/2026
PARTNERS			
Peretz Bronstein	.75	\$1,200.00	\$900
Eitan Kimelman	14.55	\$1,100.00	\$16,005.00
TOTAL			\$16,906.00

5. After the adjustments for de minimus timekeeper entries described above, the attorneys and paralegals at my firm dedicated .2 hours from June 6, 2026, through August 10, 2026 (the day the parties executed and filed the settlement

stipulation) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$220.00, based on the firm's current hourly rates that are the usual and customary rates charged for each individual in our cases. A breakdown of the Firm's hours and lodestar from June 6, 2026, through August 10, 2026, is as follows:

TIMEKEEPER	TOTAL HOURS FROM 6/6/2026 THROUGH 8/10/2026	RATE	TOTAL LODESTAR FROM 6/6/2026 THROUGH 8/10/2026
PARTNERS			
Eitan Kimelman	0.2	\$1,100.00	\$220.00
TOTAL			\$220.00

6. At a high level, the work performed by my firm during the period from inception through August 10, 2026 included: (i) investigating the claims underlying the Action; (ii) preparing the complaint; (iii) opposing defendants' motion to dismiss the complaint, which the Court denied; (iv) reviewing a substantial production of documents after the Court denied the motion to dismiss; (v) engaging in the mediation process; and (vi) undertaking work in connection with the settlement in this Action. The work performed by my firm during the period from June 5, 2026, through August 10, 2026, included undertaking work in connection with the settlement in this Action and negotiating and drafting the Stipulation and related exhibits.

Dated: October 15, 2026



Eitan Kimelman

SWORN and SUBSCRIBED before me
this 15 day of October 2026,



Notary Public

My Commission Expires:

ALVARO LAZO
Notary Public - State of New York
No. 01LA0037720
Qualified in New York County
My Commission Expires May 23, 2029