



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 BLAKE A. BENNETT IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF DELAWARE

: SS

COUNTY OF NEW CASTLE

I, Blake A. Bennett, being duly sworn, depose and say:

1. I am a Director with Cooch and Taylor P.A. ("C&T") and a member of good standing of the Delaware 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. C&T served as Counsel to Plaintiff Josh Wortman in this action and took on this representation on a fully contingent basis.

3. The information in this Affidavit regarding C&T'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 8.7 hours through August 3, 2026 (the day the settlement stipulation was signed) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$7,830.00, 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 8/3/2026	RATE	TOTAL LODESTAR THROUGH 8/3/2026
DIRECTORS			
Blake A. Bennett	8.7	\$900	\$7,830.00
TOTAL	8.7		\$7,830.00

5. After the adjustments for de minimus timekeeper entries described above, the attorneys and paralegals at my firm dedicated 8.7 hours 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 \$7,830.00 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 inception through June 5, 2026 is as follows:

TIMEKEEPER	TOTAL HOURS THROUGH 6/5/2026	RATE	TOTAL LODESTAR THROUGH 6/5/2026
DIRECTORS			
Blake A. Bennett	8.7	\$900	\$7,830.00
TOTAL	8.7		\$7,830.00

6. At a high level, the work performed by my firm during the period from inception through August 3, 2026 included: (i) investigating the claims underlying the Action; (ii) preparing Plaintiff Josh Wortman's complaint; (iii) preparing discovery; and (iv) coordinating and discussing the matter with co-counsel, Levi & Korsinsky, LLP.

7. All of C&T's expenses have been reimbursed by Levi & Korsinsky, LLP.

8. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested for the reasons set forth in Plaintiffs' Opening Brief in Support of Their Motion to Approve the Settlement and Plan of Allocation,

Certify the Class, and for an Award of Attorneys' Fees and Expenses and Service Awards.

Dated: October 1, 2026



Blake A. Bennett (#5133)

SWORN and SUBSCRIBED before me
this 1st day of October 2026,

Cynthia L. Stritzinger

Notary Public

My Commission Expires: 10-1-28

