



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 DONALD J. ENRIGHT IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF MARYLAND

: SS

COUNTY OF MONTGOMERY

I, Donald J. Enright, being duly sworn, depose and say:

1. I am a Partner with Levi & Korsinky, LLP ("L&K") and a member of good standing of the District of Columbia, Maryland, and New Jersey 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. L&K served as counsel for plaintiff Josh Wortman, and as Additional Counsel on behalf of plaintiffs in this consolidated action and took on this representation on a fully contingent basis.

3. The information in this Affidavit regarding L&K'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 minimis* 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 reasonably 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 minimis timekeeper entries described above, the attorneys at my firm dedicated 191.40 hours from inception through June 5, 2026 (the day the parties reached an agreement in principle) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$207,115, 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			
Donald J. Enright, Esq.	84	\$1,650	\$138,600
ASSOCIATE			
Noah R. Gemma, Esq.	87.50	\$675	\$59,062.50
Leah Farrar, Esq.	19.90	\$475	\$9,452.50

TOTAL	191.40		\$207,115
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5. After the adjustments for *de minimis* timekeeper entries described above, the attorneys at my firm dedicated 3.75 hours from June 6, 2026 through August 10, 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 \$4,725.00, 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			
Donald J. Enright, Esq.	2.25	\$1,650	\$3,712.50
ASSOCIATE			
Noah R. Gemma, Esq.	1.5	\$675	\$1,012.50
TOTAL	3.75		4,725

6. At 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 the defendants' motion to dismiss the complaint, which the Court denied; (iv) communicating and coordinating

with our client, Josh Wortman; and (iv) 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.

7. During the course of this Action, L&K incurred and disbursed \$3,472.51 in expenses necessary to the prosecution of the Action through the present.

These expenses are as follows:

L&K Disbursements	
Court and filing fees	\$2,632.10
Service of process	\$605.00
Travel	\$163.45
Postage	\$39.62
Notary	\$25.00
Research	\$7.34
Total Disbursements:	\$3,472.51

8. These expenses are reflected in the books and records of the firm. These books and records are prepared from invoices, bills, expense vouchers, and check records kept in the normal course of business.

9. 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 15th, 2026



Donald J. Enright

State of Pennsylvania, County of Lancaster
SWORN and SUBSCRIBED before me
this 15th day of October, 2026,


Emily Kay Nye, Remote Online Notary Public

My Commission Expires:

Commonwealth of Pennsylvania - Notary Seal EMILY KAY NYE - Notary Public Northumberland County My Commission Expires March 31, 2030 Commission Number 1467382

Donald Enright produced a MD Driver's License as identification.
This notarial act was an online notarization using multi-factor authentication and a two-way audio-video recording.