



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE ARCHER AVIATION INC.
STOCKHOLDER LITIGATION

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

**DECLARATION OF REBECCA A. MUSARRA IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

Pursuant to 10 *Del. C.* § 3927, I, Rebecca A. Musarra, do hereby declare as follows:

1. I am a Principal with Grant & Eisenhofer P.A. ("G&E") and a member of good standing of the Delaware Bar. I respectfully submit this Declaration in support of an award of attorneys' fees and expenses incurred in connection with services rendered in the above-captioned action (the "Action").

2. G&E served as co-Lead Counsel on behalf of plaintiffs in this action and took on this representation on a fully contingent basis.

3. The information in this Declaration regarding G&E'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 declaration. 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 (i.e., fewer than 10 hours) 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 Declaration 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 869.4 hours from inception through the date the parties reached a settlement in principle (June 5, 2026) to the investigation and prosecution of this Action. The lodestar value of the work through that date is \$846,917.50, 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 FROM INCEPTION THROUGH 6/5/2026	RATE	TOTAL LODESTAR THROUGH 6/5/2026
PARTNERS			
Rebecca A. Musarra	207.2	\$1,300	\$269,360.00
Christine Mackintosh	35.4	\$2,000	\$70,800.00
COUNSEL			
David Wissbroecker	340	\$1,000	\$340,000.00
ASSOCIATE			
Demetrius Davis	192.5	\$675	\$129,937.50

PARALEGAL			
Mark Hitchens	40.2	\$400	\$16,080.00
Mark Rigney	36	\$375	\$13,500.00
Michael Stein	18.1	\$400	\$7,240.00
TOTAL	869.4		\$846,917.50

5. After the adjustments for de minimus timekeeper entries described above, the attorneys and paralegals at my firm dedicated 63.4 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 \$68,920.00, 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			
Rebecca A. Musarra	18.4	\$1,300	\$23,290.00
COUNSEL			
David Wissbroecker	45	\$1,000	\$45,000.00
TOTAL	63.4		\$68,920.00

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' motions to dismiss the complaint, which the Court denied in part; (iv) reviewing 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 6, 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.

7. During the course of this Action, G&E incurred and disbursed \$51,657.81 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

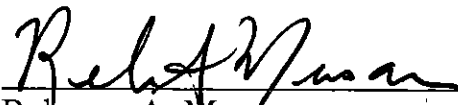
G&E DISBURSEMENTS	
Mediation Expenses	\$20,000.00
Case-Related Research	\$1,644.37
Duplication Services	\$3,887.85
E-Discovery Data Hosting Services	\$10,329.00
E-Discovery Data Processing Services	\$28.00
Filing Fees	\$8,719.63
Postage & Delivery	\$1,146.59
Service Costs	\$1,092.20
Transcription Services	\$285
Travel	\$4,525.17
Total Disbursements:	\$51,657.81

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.

I declare under penalty of perjury under the laws of the State of Delaware that the foregoing is true and correct.

Executed on the 16 day of ~~October~~ 2026



Rebecca A. Musarra