



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE ARCHER AVIATION INC.
STOCKHOLDER LITIGATION

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

**PLAINTIFFS' MOTION TO APPROVE THE SETTLEMENT AND PLAN
OF ALLOCATION, CERTIFY THE CLASS, AND FOR AN AWARD OF
ATTORNEYS' FEES AND EXPENSES AND SERVICE AWARDS**

Plaintiffs Sonal Singh (“Singh”), Saheem Kundapur (“Kundapur”), and Josh Wortman (“Wortman”) (together, “Plaintiffs”), by and through their undersigned attorneys, on behalf of themselves and the Class, hereby move the Court for entry of an order and final judgment granting: (i) final approval of the proposed Settlement between Plaintiffs and Defendants (collectively, the “Parties”), as set forth in the Stipulation and Agreement of Settlement, Compromise, and Release filed August 10, 2026 (the “Stipulation”); (ii) approval of the proposed Plan of Allocation; (iii) final certification of the Settlement Class for settlement purposes pursuant to Court of Chancery Rules 23(a), 23(b)(1), and 23(b)(2); and (iv) an award of attorneys’ fees and reimbursement of litigation expenses to Plaintiffs’ Counsel, as well as a service awards to Plaintiffs to be paid from the attorneys’ fee award.

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