



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 ERIK LUEDEKE FILED ON BEHALF OF ROBBINS
GELLER RUDMAN & DOWD LLP IN SUPPORT
OF AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

STATE OF CALIFORNIA

: SS

COUNTY OF SAN DIEGO

I, Erik Luedeke, being duly sworn, depose and say:

1. I am a Partner with Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") and a member in good standing of the California Bar. I am submitting this affidavit in support of an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-captioned action (the "Action").

2. Robbins Geller 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 affidavit regarding Robbins Geller'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 of, 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 reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the Action. 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 211.40 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 \$213,070.00, 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 FROM INCEPTION THROUGH 6/5/2026	RATE	TOTAL LODESTAR FROM INCEPTION THROUGH 6/5/2026
PARTNERS			
Baron, Randall J.	13.50	\$1,500.00	\$20,250.00
Luedeke, Erik W.	128.80	\$1,070.00	\$137,816.00

OF COUNSEL			
Avellino, Jason M.	39.00	\$955.00	\$37,245.00
ASSOCIATE			
Bolton, Tayler D.	30.10	\$590.00	\$17,759.00
TOTAL	211.40		\$213,070.00

5. After the adjustments for *de minimis* timekeeper entries described above, the attorneys at my Firm dedicated 27.40 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 \$29,920.00, 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			
Baron, Randall J.	1.40	\$1,500.00	\$2,100.00
Luedeke, Erik W.	26.00	\$1,070.00	\$27,820.00
TOTAL	27.40		\$29,920.00

6. At a high level, the work performed by my Firm during the period from inception through August 10, 2026 included: (i) pursuing books and records from New Archer pursuant to 8 *Del. C.* § 220; (ii) investigating the claims underlying the Action; (iii) preparing the complaint; (iv) opposing defendants' motion to dismiss

the complaint, which the Court denied; (v) engaging in discovery and reviewing documents produced by defendants; (vi) engaging in the mediation process; and (vii) undertaking work in connection with the settlement in this Action.

7. During the course of this Action, Robbins Geller incurred and disbursed \$20,910.00 in expenses necessary to the prosecution of the Action through the present. These expenses are as follows:

ROBBINS GELLER DISBURSEMENTS	
Filing and Other Fees	\$598.30
Transportation, Hotels, and Meals	\$5,348.70
Expert (Matthew D. Cain dba Cleveland Analytics, LLC)	\$3,500.00
eDiscovery Database Hosting	\$1,463.00
Mediation Fees (Phillips ADR Enterprises, P.C.)	\$10,000.00
Total Disbursements:	\$20,910.00

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 expenses 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 15, 2026


Erik Luedeke

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Subscribed and sworn to (or affirmed) before me on this 15th day of October 2026, by Erik Luedeke, proved to me on the basis of satisfactory evidence to be the person who appeared before me.





Notary Public, State of California