#### IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE AMC ENTERTAINMENT HOLDINGS, INC.
STOCKHOLDER LITIGATION

CONSOLIDATED C.A. No. 2023-0215-MTZ

### AFFIDAVIT OF THOMAS CURRY IN SUPPORT OF PLAINTIFFS' REQUEST FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

STATE OF DELAWARE

: SS

COUNTY OF NEW CASTLE:

I, Thomas Curry, being duly sworn, depose and say:

- 1. I am a Director of Saxena White P.A., and a member in good standing of the Delaware Bar. I submit this Affidavit in support of Plaintiffs' request for an award of attorneys' fees and the reimbursement of expenses incurred in the prosecution of this action.
- 2. Alongside Co-Lead Counsel of record for Plaintiffs in the above-captioned action—Bernstein Litowitz Berger & Grossman LLP, Fields Kupka & Shukurov LLP, and Grant & Eisenhofer P.A.—Saxena White is serving as additional counsel for Plaintiffs and counsel for Plaintiff Allegheny County Employees' Retirement System.
- 3. The information in this Affidavit regarding the Firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the

Director who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, I believe that the time reflected in the firm's 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. Based on the aforementioned records maintained by my firm, attorneys and paralegals at Saxena White devoted 627.75 hours in time with respect to this action from inception through May 1, 2023 (the date the revised Notice and Scheduling Order were filed in connection with the Proposed Settlement). A breakdown of the lodestar is provided in Exhibit A. Saxena White's total lodestar based on current rates was: \$437,332.50. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

- 5. Saxena White seeks an award of \$26,347.36 in expenses and charges in connection with the prosecution of this Action. This consists of the expenses and charges summarized by category in Exhibit B.
- 6. The expenses pertaining to this Action are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of expenses incurred.

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

\* \* \*

Dated: May 4, 2023

Thomas Curry (#5877)

SWORN TO AND SUBSCRIBED BEFORE ME this 4m day of May, 2023.

Tayler D. Bolton Attorney-at-Law

Notary per 29 <u>Del. C.</u> § 4323(a)(3)

## **EXHIBIT A**

In re AMC Entertainment Holdings, Inc. Stockholder Litigation C.A. No. 2023-0215-MTZ

#### SAXENA WHITE TIME REPORT

# **Inception through May 1, 2023**

NAME	HOURLY	HOURS	LODESTAR
	RATE		
Directors			
Thomas Curry	\$850.00	98.25	\$83,512.50
Senior Counsel			
David Wales	\$850.00	200	\$170,000.00
Attorneys			
Adam Warden	\$660.00	124.5	\$82,170.00
Alec Coquin	\$660.00	36.75	\$24,255.00
Staff Attorneys			
Nicholas Atkinson	\$460.00	120.75	\$55,545.00
Christine Sciarrino	\$460.00	47.5	\$21,850.00
TOTAL LODESTAR		627.75	\$437,332.50

# **EXHIBIT B**

In re AMC Entertainment Holdings, Inc. Stockholder Litigation C.A. No. 2023-0215-MTZ

## SAXENA WHITE EXPENSE REPORT

CATEGORY	AMOUNT(\$)	
Expert Fees	\$22,747.50	
Mediation Fee	\$2,310.00	
Online Legal and Factual Research	\$986.64	
Service of Process	\$225.20	
Printing and Photocopy	\$78.02	
TOTAL EXPENSES:	\$26,347.36	