



**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 WALTER SZYMANSKI IN SUPPORT OF PROPOSED  
SETTLEMENT, APPLICATION FOR ATTORNEYS' FEES AND  
EXPENSES, AND INCENTIVE AWARD FOR PLAINTIFFS**

STATE OF PENNSYLVANIA        )  
  ) ss.  
COUNTY OF ALLEGHENY        )

Walter Szymanski, being duly sworn, deposes and says:

1. I am the Executive Director of the Allegheny County Employees Retirement System ("Allegheny"), Co-Lead Plaintiff in the above-entitled action ("Action"). I respectfully submit this Affidavit in support of the proposed settlement of the Action, the requested fee and expense award, and my request for an incentive award to Allegheny for its work as a representative plaintiff in this Action, which would be paid solely from any award of attorneys' fees and expenses ordered by the Court.

2. Allegheny is a public pension fund organized for the benefit of current and retired employees of Allegheny County, Pennsylvania. Allegheny is the

beneficial owner of shares of AMC Entertainment Holdings, Inc. common stock and has held such shares continuously since December 16, 2015.

3. In connection with Allegheny's role as Co-Lead Plaintiff in this Action, I have monitored the work of counsel and have been kept apprised of the status of the litigation. I have regularly communicated with Allegheny's counsel regarding the strategic direction, significant developments, status updates, and major decisions in the litigation.

4. Further, I have discussed with Allegheny's counsel and/or reviewed the pleadings and relevant documents in this Action, including the motion for a temporary restraining order and expedited proceedings and the document demand served on Allegheny. To produce its documents, Allegheny conducted electronic searches of emails and texts, including of mine, and also searched and produced hard copy documents which resulted in the provision of more than 3,206 documents (39,238 pages) to Allegheny's counsel.

5. On March 29, 2023, I met with attorneys from Grant & Eisenhofer, P.A., Allegheny's counsel in this matter, to prepare for my scheduled deposition as the representative of Allegheny.

6. I, and others at Allegheny, also discussed with our counsel the Settlement Agreement. Allegheny accepted and authorized the Settlement Agreement because we believe that it is a fair, reasonable, and adequate compromise

that is in the best interest of the Class. We believe that, balanced against the risks, duration and uncertainty of continued litigation, the Settlement Agreement's guarantee of significant benefits to the Class—with the payment of one share of common stock for every 7.5 shares owned as of the record date—is an excellent result and supports settling the Action on the agreed terms.

7. Allegheny, and I personally, were subject to many negative on-line posts due to Allegheny's role as Co-Lead Plaintiff in this Action. In addition, as a public fund, Allegheny received numerous calls and emails about the case, both for and against it, and took time fielding, responding, and, where appropriate, forwarding them to counsel.

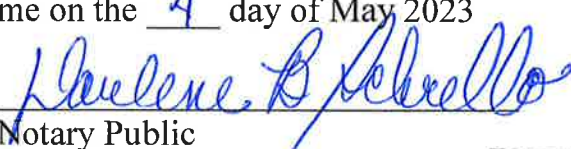
8. Allegheny's counsel never offered any assurance that Allegheny would receive any compensation for bringing this Action, and the prospect of such an award was not a factor in Allegheny's decision to initiate, pursue, or settle the Action. Allegheny did not commence this Action to obtain any special benefit. Allegheny has not received, been promised, or been offered—and would not and will not accept—any form of compensation, directly or indirectly, for prosecuting or serving as a representative party in this Action except (i) such fees, costs, or other payments as the Court expressly approved to be paid to Allegheny or on Allegheny's behalf, or (ii) reimbursement, paid by my attorneys, or actual and reasonable out-of-pocket expenditures in connection with the prosecution of this Action.

9. Allegheny's counsel has requested on Allegheny's behalf a \$5,000 Incentive Award in consideration of the time and effort Allegheny expended on behalf of the Class.

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

  
Walter Szymanski, Executive Director  
Allegheny County Employees Retirement  
System

SWORN and SUBSCRIBED before  
me on the 4 day of May 2023

  
Notary Public

My Commission Expires on:

8/15/2023

