



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

**ADDENDUM TO STIPULATION AND AGREEMENT OF
COMPROMISE, SETTLEMENT, AND RELEASE**

WHEREAS, on April 27, 2023, all parties to the above-captioned action (the “Parties”) executed a Stipulation and Agreement of Compromise, Settlement, and Release (the “Stipulation”) to resolve the above-captioned action;

WHEREAS, on July 21, 2023, the Court issued an Opinion finding that the definition of “Released Plaintiffs’ Claims” in the Stipulation was overly broad;

WHEREAS, the Parties have conferred and agreed to amend the definition of “Released Plaintiffs’ Claims” to address the issue identified in the Court’s Opinion;
and

WHEREAS, this Addendum shall not in any way impact any of the other terms and conditions of the Stipulation or the obligations of the Parties set forth therein;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED;

1. Paragraph 1.r of the Stipulation is hereby amended to read as follows:

“Released Plaintiffs’ Claims” means any and all actions, causes of action, suits, liabilities, claims, rights of action, debts, sums of money, covenants, contracts, controversies, agreements, promises, damages,

contributions, indemnities, and demands of every nature and description, whether or not currently asserted, whether known claims or Unknown Claims, suspected, existing, or discoverable, whether arising under federal, state, common, or foreign law, and whether based on contract, tort, statute, law, equity, or otherwise (including, but not limited to, federal and state securities laws), that Plaintiffs or any other Settlement Class Member: (i) asserted in the *Allegheny* Complaint or the *Munoz* Complaint; or (ii) ever had, now have, or hereafter can, shall, or may have, directly, representatively, derivatively, or in any other capacity that, in full or part, concern, relate to, arise out of, or are in any way connected to or based upon the allegations, transactions, facts, matters, occurrences, representations, or omissions involved, set forth, or referred to in the Complaints and that relate to the ownership of Common Stock during the Class Period, except claims with regard to enforcement of the Settlement and this Stipulation.

2. The previous version of Paragraph 1.r reflected in the Stipulation as executed on April 27, 2023 shall have no effect.

3. This Addendum shall not in any way impact any of the other terms and conditions of the Stipulation or the obligations of the Parties set forth therein.

IN WITNESS WHEREOF, the Parties, through their undersigned counsel, have executed this Addendum effective as of July 22, 2023.

Of Counsel:

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**

Mark Lebovitch
Jeroen van Kwawegen
Edward Timlin
Sara Swartzwelder
1251 Avenue of the Americas
New York, NY 10020
(212) 554-1400

**FIELDS KUPKA &
SHUKUROV LLP**

William J. Fields
Christopher J. Kupka
Samir Shukurov
1441 Broadway, 6th Floor #6161
New York, NY 10018
(212) 231-1500

SAXENA WHITE P.A.

David Wales
10 Bank Street, 8th Floor
White Plains, NY 10606
(914) 437-8551

– and –

Adam Warden
7777 Glades Road, Suite 300
Boca Raton, FL 33434
(561) 394-3399

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

By: /s/ Gregory V. Varallo
Gregory V. Varallo (#2242)
Daniel E. Meyer (#6876)
500 Delaware Avenue, Suite 901
Wilmington, DE 19801
(302) 364-3601

GRANT & EISENHOFER P.A.

By: /s/ Michael J. Barry
Michael J. Barry (#4368)
Kelly L. Tucker (#6382)
Jason M. Avellino (#5821)
123 Justison Street, 7th Floor
Wilmington, DE 19801
(302) 622-7000

SAXENA WHITE P.A.

By: /s/ Thomas Curry
Thomas Curry (#5877)
824 N. Market Street, Suite 1003
Wilmington, DE 19801
(302) 485-0483

Attorneys for Plaintiffs

**RICHARDS, LAYTON &
FINGER, P.A.**

Of Counsel:

John A. Neuwirth
Joshua S. Amsel
Matthew S. Connors (#5598)
Tanner S. Stanley
**WEIL, GOTSHAL &
MANGES LLP**
767 Fifth Avenue
New York, NY 10153
(212) 310-8000

/s/ Kevin M. Gallagher

Raymond J. DiCamillo (#3188)
Kevin M. Gallagher (#5337)
Matthew Murphy (#5938)
Edmond S. Kim (#6835)
Adriane M. Kappauf (#7073)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
(302) 651-7700

*Attorneys for Defendants Adam M.
Aron, Denise Clark, Howard W. Koch,
Jr., Philip Lader, Gary F. Locke,
Kathleen M. Pawlus, Keri Putnam,
Anthony J. Saich, Adam J. Sussman, Lee
Wittlinger, and AMC Entertainment
Holdings, Inc.*