

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

SONNY ST. JOHN, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

CLOOPEN GROUP HOLDING LIMITED,
CHANGXUN SUN, YIPENG LI, KUI ZHOU,
QINGSHENG ZHENG, XIAODONG LIANG, ZI
YANG, MING LIAO, FENG ZHU, LOK YAN HUI,
JIANHONG ZHOU, CHING CHIU, COGENCY
GLOBAL INC., COLLEEN A. DEVRIES, GOLDMAN
SACHS (ASIA) L.L.C., CITIGROUP GLOBAL
MARKETS INC., CHINA INTERNATIONAL
CAPITAL CORPORATION HONG KONG
SECURITIES LIMITED, TIGER BROKERS (NZ)
LIMITED, and FUTU, INC.,

Defendants.

Index No. 652617/2021

Part 53: Hon. Andrew Borrok

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES TO
CLASS COUNSEL AND SERVICE AWARD TO PLAINTIFFS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE, that upon the annexed Joint Affirmation of Max R. Schwartz and Michael Dell'Angelo in Support of (1) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; (2) Plaintiffs' Class Counsel's Application for Attorneys' Fees and Expenses and (3) Plaintiffs' Requests for Service Awards, dated December 19, 2023, and the exhibits annexed thereto, the accompanying Memorandums of Law in support of motion, and upon all prior pleadings and proceedings had herein, State Plaintiff Sonny St. John will move this Court at the Motion Submission Part at the Courthouse located at 60 Centre Street, Room 130, New York, New York 10007 on January 23, 2024, at 9:30 a.m., or as soon thereafter as the matter may be heard, for an order pursuant to New York Civil Practice Law and Rules Article 9: (i) collectively awarding to all Plaintiffs' Counsel attorneys' fees in the amount of 33-1/3% of the total Settlement fund, which is inclusive of State Class Counsel Scott+Scott Attorneys at Law LLP individual's request for attorneys' fees in the amount of 23.3% of the total Settlement fund, as well as expenses; and (ii) granting a service award to Plaintiffs for their work in representing the Settlement Class.

Per the schedule ordered by the Court in the Order Preliminarily Approving Settlement and Providing for Notice (NYSCEF No. 112) dated October 5, 2023, any exclusions must be filed by December 26, 2023, and any objections must be filed by January 2, 2024, with Plaintiffs' reply due by January 16, 2024.

No previous application has been made for the relief requested.

Dated: December 21, 2023
New York, NY

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Max R. Schwartz
Max R. Schwartz

Emilie B. Kokmanian
Mandeep S. Minhas
The Helmsley Building
230 Park Avenue, 17th Floor
New York, New York 10169
Telephone: (212) 223-6444
Facsimile: (212) 223-6334
mschwartz@scott-scott.com
ekokmanian@scott-scott.com
mminhas@scott-scott.com

Counsel for Plaintiff Sonny St. John