

**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 FINAL APPROVAL OF THE SETTLEMENT AND PLAN  
OF ALLOCATION**

**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, Plaintiffs Sonny St. John and Guozhang Wang<sup>1</sup> 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) granting final approval of the proposed \$12,000,000 settlement (the "Settlement") of this securities class action (the "Action"); and (ii) granting approval of the proposed Plan of Allocation.

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.

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<sup>1</sup> As discussed in the Memorandum of Law submitted in support hereof, Guozhang Wang (the "Federal Plaintiff") is the Court-appointed Lead Plaintiff in the related federal action, *Dong v. Cloopen Group Holding Limited, et al.*, No 1:21-cv-10610-JGK-RWL (S.D.N.Y.) (the "Federal Action").

Dated: December 21, 2023  
New York, NY

Respectfully submitted,

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

/s/ Max R. Schwartz

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*Counsel for Plaintiff Sonny St. John*