

**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**

**SUPPLEMENTAL JOINT AFFIRMATION OF MAX R. SCHWARTZ AND MICHAEL  
DELL'ANGELO IN FURTHER SUPPORT OF: (1) PLAINTIFF'S MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND PLAN OF ALLOCATION; (2) PLAINTIFFS' COUNSEL'S APPLICATIONS FOR  
ATTORNEYS' FEES AND EXPENSES; AND  
(3) PLAINTIFFS' REQUESTS FOR SERVICE AWARDS**

Max R. Schwartz and Michael Dell'Angelo (pending Notice of Motion to Admit Counsel  
*Pro Hac Vice*, NYSCEF No. 114), attorneys duly admitted to practice law before this Court, hereby  
affirm the following under the penalty of perjury, pursuant to CPLR 2106:

1. Unless otherwise indicated, we have personal knowledge of the matters set forth  
herein based upon our extensive participation in the prosecution and settlement of the claims  
asserted. If called upon by the Court, we could and would competently testify that the following  
facts are true and correct.

2. We submit this supplemental affirmation in further support of: (1) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; (2) Plaintiffs' Counsel's Applications for Attorneys' Fees and Expenses; and (3) Plaintiffs' Requests for Service Awards.

3. Paragraph 27 of the Court's October 5, 2023 Preliminary Approval Order (NYSCEF No. 112) directed Settlement Class Members wishing to object to the Settlement, Plan of Allocation, and/or award of attorneys' fees and expenses (including award to Plaintiffs), to file their objections with the Court and serve copies of such objections on Plaintiffs' Counsel and Defense Counsel, Wilson Sonsini Goodrich & Rosati, P.C., by January 2, 2024. Plaintiffs' Counsel has not been served with any objections and none appear on the Court's electronic docket. Defense Counsel also confirmed to Plaintiffs' Counsel that it has not been served with any objections.

4. The Notice provided to Settlement Class Members likewise directed that any requests for exclusion from the Settlement ("opt-out requests") must be mailed to the Claims Administrator by December 26, 2023. The Claims Administrator has advised Plaintiffs' Counsel that it has received no requests for exclusion from Settlement Class Members. Nor have Plaintiffs' Counsel or Defense Counsel received any opt-out requests.

5. Attached hereto as Exhibit A is the proposed Order and Final Judgment.

6. Attached hereto as Exhibit B is the proposed Order Approving Plan of Allocation.

7. Attached hereto as Exhibit C is the proposed Order Approving Attorneys' Fees, Litigation Expenses, and Service Awards.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 16th day of January 2024, in New York, New York.

/s/Max R. Schwartz

Max R. Schwartz

I certify under penalty of perjury that the foregoing is true and correct. Executed this 16th day of January 2024, in Philadelphia, PA.

/s/Michael Dell'Angelo

Michael Dell'Angelo

**PRINTING SPECIFICATIONS STATEMENT**

Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affirmation was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman  
Point Size: 12  
Line Spacing: Double

The total number of words in the affirmation, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 336 words.

DATED: January 16, 2024

/s/Max R. Schwartz  
Max R. Schwartz