

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

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IN RE RENREN INC. :

DERIVATIVE LITIGATION : Index No. 653564/2018

: Hon. Andrew Borrok

: Mot. Sequence 28

**AFFIRMATION OF CHRISTINE M. MACKINTOSH ON BEHALF OF
GRANT & EISENHOFER, P.A., IN SUPPORT OF THE PROPOSED
SETTLEMENT AND APPLICATION FOR AN AWARD OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES**

Christine M. Mackintosh, an attorney duly admitted *pro hac vice* in the above-captioned action (the “Action”), who is not a party to the Action, hereby affirms the following, pursuant to the Rule 2106 of New York Civil Practice Law and Rules, to be true under the penalties of perjury:

1. I am a Principal in the law firm of Grant & Eisenhofer, P.A. (“G&E”), one of co-lead counsel for Plaintiffs in the Action. This affirmation is submitted in support of Plaintiffs’ counsel’s application for attorneys’ fees and reimbursement of expenses and to provide the Court with details regarding the attorney and professional support staff hours and expenses my firm expended in the Action.

2. My firm’s compensation for services rendered in the Action was contingent on its success. The fees and unreimbursed expenses described herein have not been paid from any source and have not been the subject of any prior request, or prior award, in any litigation or other proceeding.

3. In sum, G&E devoted 1,946.40 hours to the case through May 10, 2022. A breakdown of the time spent by each timekeeper at my firm who worked on the Action is as follows:

TIMEKEEPERS	HOURS
PRINCIPALS	
Michael J. Barry	3.50
Christine M. Mackintosh	455.10
ASSOCIATES	
Michael Bell	437.50
Joseph Christensen	98.00
Lawrence Kempner	15.90
Edward Lilly	740.30
Vivek Upadhyia	5.40
PARALEGALS	
Valisity Beal	0.10
Max Brandy	4.50
Robyn Finnimore-Pierce	3.10
Remi Hovsepian	57.90
Meghan Leyh	47.00
Toby Saviano	63.70
Trineka Schuster	9.80
Ronald E. Wittman	0.90
Keith DiGuglielmo	3.20
Mark Rigney	0.50
Total:	1,946.40

4. All of the time listed above was reasonably and necessarily expended. The time expended includes legal and factual research regarding the potential claims in the case; drafting and editing the complaint and amended complaint; researching, drafting, and editing briefs in opposition to Defendants' motions to dismiss and appeals from the denials thereof; preparing for and conducting oral argument on the motion to dismiss the claims against Defendant Duff & Phelps; researching, drafting, and editing a motion for attachment and opposing an appeal from the ordering granting this motion; researching, drafting, and editing papers opposing Duff & Phelps' order to show cause to permanently seal a document produced in discovery and preparing to oppose the appeal denying such request; researching, drafting, and editing papers opposing objections and motions to intervene filed by former Renren stockholders in response to the originally proposed settlement; negotiating with former Renren stockholders concerning their objections to the originally proposed settlement; engaging in discovery, including preparing

document requests, negotiating with defense counsel concerning the scope of the documents to be produced in response thereto, and reviewing and analyzing thousands of documents produced (many of which needed to be translated from Chinese to English); participating in conferences with co-counsel; participating in numerous meet and confers with defense counsel; attending by Microsoft Teams the hearings on Defendants' motions to dismiss, the motion for attachment, Duff & Phelps' motion for an order sealing documents produced in discovery, and conferences with the Court, defense counsel, and counsel for former Renren stockholders relating to the former stockholders' objections to the originally proposed settlement; attending the virtual argument before the Court of Appeals on Defendants' appeal of the denial of their motions to dismiss; participating in 3 full day mediation sessions before the Honorable Layn Phillips (Ret.) by Zoom and numerous telephonic follow up sessions; and negotiating and documenting the proposed settlement.

5. The hours expended by G&E personnel in connection with this Action are recorded in time records kept by my firm in the ordinary course of business and they are an accurate record of the time expended by my firm.


6. Detailed below are the expenses that my firm has expended as of the date of this affirmation:

EXPENSES	
Category	Amount
Duplication Services	\$951.60
Filing Fees	\$375.00
Expert Fees	\$31,196.26
Mediation Fees	\$26,338.45
Postage	\$19.00
Case Related Research	\$6,172.74
Outside Counsel	\$52,913.14
Service Fees	\$1,131.42
E-Discovery Data Hosting and Processing Services	\$6,187.00
Bond Payment	\$2,250.00
Total:	\$127,534.61

7. The expenses incurred in connection with litigating this Action are reflected in the books and records of my firm maintained in the ordinary course of business. These books and records are prepared from expense vouchers, check records, and other documents, and are an accurate record of the expenses. All of these expenses were reasonably and necessarily incurred.

8. With respect to the standing of counsel in this Action, a biography of my firm is attached as Exhibit 1 and incorporated herein by reference. This information is available on my firm's website, www.gelaw.com.

Dated: Wilmington, Delaware
May 12, 2022

By: 
CHRISTINE M. MACKINTOSH

PRINTING SPECIFICATIONS STATEMENT

Pursuant to N.Y.C.R.R. §202.70(g), Rule 17, I hereby certify 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 foregoing Affirmation, inclusive of point headings and exclusive of the caption, the signature block and the certificate of compliance is 756 words.

Dated: Wilmington, Delaware
May 12, 2022



Christine M. Mackintosh