

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

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	: Index No. 653594/2018
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IN RE RENREN, INC.	:
DERIVATIVE LITIGATION	:
	: Hon. Andrew Borrok
	:
	: Mot. Seq. No. 021
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	X

**NOTICE OF PLAINTIFFS' MOTION FOR
APPROVAL OF PROPOSED SETTLEMENT AND
AWARD OF ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of Plaintiffs' Motion for Approval of the Proposed Settlement and an Award of Attorneys' Fees and Expenses ("**Motion**"); (ii) Affirmation of William T. Reid, IV, dated November 1, 2021, together with the exhibits annexed thereto; (iii) Affirmation of Jeffrey E. Gross, dated November 1, 2021, together with the exhibit annexed thereto; (iv) Affirmation of Mark C. Zauderer, dated November 1, 2021; (v) Affirmation of James Notis, dated November 1, 2021, together with the exhibit annexed thereto; (vi) Affirmation of Christine M. Mackintosh, dated November 1, 2021, together with the exhibit annexed thereto; (vii) Affidavit of Alexander Shogi, dated November 1, 2021; (viii) Affirmation of Phillip Meyer, dated November 2, 2021;¹ (ix) Affidavit of Peter Halesworth, dated November 1, 2021; and (x) Affidavit of Jodi Arama, dated October 20, 2021, Plaintiffs Heng Ren Silk Road Investments LLC, Oasis Investments II Master Fund Ltd., and Jodi Arama (together, "**Plaintiffs**"), derivatively on behalf of Renren, Inc. ("**Renren**") by their attorneys Reid Collins & Tsai LLP, Grant & Eisenhofer, P.A, Gardy & Notis, LLP, and Ganfer, Shore, Leeds & Zauderer, LLP will move this Court on the 9th day of

¹ Mr. Meyer is located in Hong Kong and is 12 hours ahead of U.S. Eastern Time.

December 2021, at 9:30 AM, pursuant to the procedures set forth in the Scheduling Order entered by the Court on October 18, 2021 [[NYSCEF No. 755](#)], for an order pursuant to BCL §626: (i) granting final approval of the Settlement; (ii) approving plaintiffs' counsel's request for an award of attorneys' fees in the amount of 33% of the Settlement Amount and reimbursement of expenses in the amount of \$906,470.47; and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the above-referenced Scheduling Order, any answering papers or objections to the relief requested herein must be filed and served in accordance with paragraphs 8 through 13 of the above-referenced Scheduling Order on or before November 24, 2021. In accordance with paragraph 18 of the above-referenced Scheduling Order, reply papers, if any, shall be filed and served no later than December 2, 2021.

PLEASE TAKE FURTHER NOTICE, that pursuant to the above-referenced Scheduling Order, the Settlement Hearing for this matter will be held virtually via Microsoft Teams. Please visit www.renrensettlement.com for a link to attend the Settlement Hearing.

Dated: New York, New York
November 1, 2021



Jeffrey E. Gross