

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

_____	x
	: Index No. 653594/2018
<b>IN RE RENREN, INC.</b>	:
	: Hon. Andrew Borrok
<b>DERIVATIVE LITIGATION</b>	:
	: Mot. Seq. No. 28
	:
_____	x

**AFFIRMATION OF MARK C. ZAUDERER IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR APPROVAL OF PROPOSED  
SETTLEMENT AND AWARD OF ATTORNEYS’ FEES AND EXPENSES**

Mark C. Zauderer, an attorney duly admitted to practice law in the state of New York and not a party to this action, hereby affirms under the penalties of perjury as follows:

1. I am a partner of Ganfer Shore Leeds & Zauderer LLP (“GSLZ”). I have personal knowledge of the facts asserted herein. I submit this Affirmation in support of Plaintiffs’ counsel’s application for attorney’s fees and reimbursement of expenses and to provide the Court with details regarding the attorney hours and expenses GSLZ expended in the above-captioned action (the “Action”).

2. GSLZ’s compensation for services rendered in litigating this shareholder derivative Action is contingent on Plaintiffs achieving a recovery in the Action, with any fee award to be determined by the Court. GSLZ has not been compensated for the hours expended below or in any other way in connection with the Action. The fees requested for the work described in this Affirmation have not been paid from any source; nor are they the subject of any pending request or prior award in this Action or in any litigation or other proceeding.

3. So far, from the filing of the Action on July 19, 2018 through May 9, 2022, GSLZ has devoted 811.80 attorney and paralegal hours to this Action. A breakdown of the time spent by each GSLZ attorney who has worked on the matter and the firm’s paralegal staff is as follows:

ATTORNEY HOURS	
Attorney	Hours
Mark Zauderer (P)	155.00
Ira Matetsky (P)	13.50
Jason Cohen (C)	629.30
Grant Shehigian (A)	10.50
Paralegals	3.50
<b>Total</b>	<b>811.80</b>

\*(P) = Partner, (C) = Counsel, (A) = Associate

4. All of the time listed above was reasonably and necessarily expended, in my opinion. The time incurred but GSLZ in this litigation includes work conducting legal and factual research regarding the claims in the case and drafting and editing pleadings; researching, drafting, filing and arguing Plaintiffs' motion for alternative methods of service on certain defendants; preparing and filing *pro hac vice* motions; researching, drafting and editing papers opposing Defendants' multiple motions to dismiss and appeals and attending argument regarding same; researching, drafting, editing and advising co-counsel on a motion for attachment, opposing an appeal thereof and attending argument regarding same; engaging in discovery; participating in strategy conferences with co-counsel; participating in meet and confers with defense counsel; attending court conferences both in person and by Microsoft Teams; preparing for and participating in mediation sessions; advising on the proposed settlement; researching, drafting, editing and advising co-counsel on motions to approve the settlement, multiple intervention motions and motion to vacate the attachment order; advising and drafting with regard to appeals arising from the denial of a settlement agreement and motions to intervene and attending argument and hearings regarding same; participating in mediation before this Court; and consulting with co-counsel regarding numerous additional strategy and legal issues involving New York State trial court and appellate practice and the relevant jurisprudence of New York and other jurisdictions.

The hours worked by GSLZ are recorded in contemporaneously maintained time records kept by my firm, and they are an accurate record of the time expended by my firm.

5. In my 50 years of practice, this was one of the most complex and unique actions I have encountered in the many jurisdictions and courts in which I have practiced around the country, including the many actions in which I have represented parties in complex matters in the Commercial Division of the State of New York. I was a member of Chief Judge Judith S. Kaye's Task Force that worked to establish the Commercial Division in 1995 and, since then, have practiced extensively in this Commercial Division. Defendants were vigorously represented by a host of prominent law firms. Plaintiffs' counsel advanced novel theories of standing, obtained personal jurisdiction over defendants in far-flung locations, defeated numerous motions to dismiss and appeals, and won an order of attachment of more than half a billion dollars, all of which contributed to Plaintiffs' counsel being able to negotiate one of the largest derivative settlements in history.

6. The expenses that GSLZ incurred that are unreimbursed as of the date of this affidavit are detailed below:

<b>EXPENSES</b>	
<b>Category</b>	<b>Amount</b>
Copy and Printing	\$0.75
Filing Fees and Court Reporter Fees	\$90.00
Conference Calls	\$98.46
Meals/ Travel	\$98.63
PACER/United Lawyers Service/Court Alert	\$720.92
Postage & Federal Express	\$35.82
<b>Total:</b>	<b>\$1,044.58</b>

7. These expenses are derived from expense vouchers, invoices, check records and other documents, and are an accurate record of the reasonable costs incurred directly by GLZ to

litigate this action. These costs and expenses are fully attributable to the case and have not been reimbursed.

8. We respectfully direct the Court to my Wikipedia biography, [wikipedia.org/wiki/Mark\\_C.\\_Zauderer](https://wikipedia.org/wiki/Mark_C._Zauderer), and to the biography of GSLZ and the firm's attorneys who worked on this litigation, on the firm's website, [ganfershore.com](https://ganfershore.com), for further information about the many awards and recognition that the firm and its lawyers have received.

Dated: New York, NY  
May 12, 2022

/s/ Mark C. Zauderer  
Mark C. Zauderer

**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 805 words.

Dated: New York, New York  
May 12, 2022

/s/ Mark C. Zauderer  
Mark C. Zauderer