

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

_____ x
: Index No. 653594/2018
:
IN RE RENREN, INC. : Hon. Andrew Borrok
DERIVATIVE LITIGATION :
: Mot. Seq. No. 028
:
_____ X

[PROPOSED] ORDER TO SHOW CAUSE

UPON the reading and the filing of (i) the Affirmation, dated April 29, 2022, of William T. Reid, IV, counsel for Plaintiffs Heng Ren Silk Road Investments LLC, Oasis Investments II Master Fund Ltd., and Jodi Arama (together, “**Plaintiffs**”), and the exhibit thereto; (ii) the Third Affirmation of Samuel Martin Pierce Dawson, dated April 28, 2022, and the exhibit thereto; and (iii) the Supplemental Affidavit of Alexander Villanova Regarding Administration of Settlement, dated April 28, 2022, and the exhibit thereto, together with Plaintiffs’ accompanying memorandum of law, and upon all prior pleadings and proceedings had herein, and sufficient cause being alleged,

NOW, upon motion of the Plaintiffs,

LET the parties hereto **SHOW CAUSE**, before this Court, at Part 53, Room 659 at 60 Centre Street, New York, New York, on the ____ day of _____, 2022, or as soon thereafter as counsel may be heard, why an Order should not be entered:

- (i) pursuant to CPLR 2221(e) granting renewal of the portion of Plaintiffs’ prior motion (Motion Seq. No. 021) seeking approval of the settlement (the “**Settlement**”) memorialized in the Stipulation of Settlement filed October 7, 2021 [[NYSCEF 753](#)], and upon renewal, approving the Settlement, and, if necessary, granting leave to reargue pursuant to CPLR 2221(d) and/or vacating such orders pursuant to CPLR

5015(a) and the Court's inherent authority, and approving the Settlement (the "**Motion to Renew**");

- (ii) Providing for an award of fees and expenses to Plaintiffs' counsel upon a revised request, to be separately briefed as set forth herein; and
- (iii) granting such other and further relief as the Court deems just and proper.

IT IS FURTHER ORDERED that papers responding to the Motion to Renew, if any, shall be filed and served on or before _____, 2022, and reply papers, if any, shall be filed and served on or before _____, 2022.

IT IS FURTHER ORDERED that Plaintiffs' counsel shall file and serve papers in support of any new and revised application for an award of fees and expenses (to be paid out of the common fund to be created if the Settlement is approved upon reconsideration) on or before _____, 2022; any objections or opposition to such fee request shall be filed and served on or before _____, 2022; and any papers addressing any objections or opposition to such request for an award of fees and expenses shall be filed and served on or before _____, 2022.

IT IS FURTHER ORDERED that Plaintiffs' counsel shall provide notice of any new and revised request for an award of fee and expenses by causing the Settlement Administrator to upload all papers in support of such request to the website maintained by the Settlement Administrator, renrensettlement.com, who shall transmit such papers to all shareholders who previously objected to the prior fee request, and provide any additional notice as otherwise directed by the Court subsequently hereto.

IT IS FURTHER ORDERED that service of a copy of this Order, together with the papers upon which it is based, shall be made by the e-filing of this Order. Plaintiffs shall also

cause a copy of the Motion to Renew to be uploaded to the website maintained by the Settlement Administrator, renrensettlement.com, and transmitted by the Settlement administrator to all prior objectors to the Settlement. Such service shall constitute good and sufficient service.

ENTER:

Hon. Andrew Borrok, J.S.C.