

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUAN CHEN, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

MISSFRESH LIMITED, ZHENG XU, JUN
WANG, YUAN SUN, ZHAOHUI LI, COLLEEN A.
DE VRIES, HANSONG ZHU, J.P. MORGAN
SECURITIES LLC, CITIGROUP GLOBAL
MARKETS INC., CHINA INTERNATIONAL
CAPITAL CORPORATION HONG KONG
SECURITIES LIMITED, CHINA RENAISSANCE
SECURITIES (HONG KONG) LIMITED, HAITONG
INTERNATIONAL SECURITIES COMPANY
LIMITED, CMB INTERNATIONAL CAPITAL
LIMITED, AMTD GLOBAL MARKETS LIMITED,
ICBC INTERNATIONAL SECURITIES LIMITED,
NEEDHAM & COMPANY, LLC, CHINA
MERCHANTS SECURITIES (HK) CO., LIMITED,
ABCI SECURITIES COMPANY LIMITED, GF
SECURITIES (HONG KONG) BROKERAGE
LIMITED, FUTU INC., TIGER BROKERS (NZ)
LIMITED, and COGENCY GLOBAL, INC.,

Defendants.

Case No. 1:22-cv-09836-JSR

**SUPPLEMENTAL DECLARATION OF LANCE CAVALLO REGARDING:
(A) UPDATE ON PROVISION OF POSTCARD NOTICE AND NOTICE PACKET;
(B) UPDATE ON TELEPHONE HOTLINE AND SETTLEMENT WEBSITE; AND
(C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, Lance Cavallo, declare and state as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Vice President of Class Actions at Verita Global, LLC (“Verita”). Pursuant to the Court’s July 3, 2024 Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of

Settlement (“Preliminary Approval Order,” ECF No. 144), the Court approved the retention of Verita as Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Action”).¹ *See* Preliminary Approval Order ¶8. I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

UPDATE ON MAILING OF THE POSTCARD NOTICE AND NOTICE PACKET

2. As set forth in the previously filed Initial Mailing Declaration (*see* ECF No. 149-4), a total of 9,880 Postcard Notices and 283 Notice Packets had been disseminated to potential Settlement Class Members and nominees as of September 4, 2024. Since the execution of the Initial Mailing Declaration, Verita has continued to receive requests from potential Settlement Class Members and nominees for copies of the Postcard Notice and Notice Packet. As a result, an additional 161 Postcard Notices and no Notice Packets have been mailed or emailed, such that as of October 1, 2024, Verita has disseminated a total of 10,041 Postcard Notices and 283 Notice Packets to potential Settlement Class Members or their nominees.

UPDATE ON TELEPHONE HOTLINE AND SETTLEMENT WEBSITE

3. The Initial Mailing Declaration noted that Verita maintains a toll-free telephone number (1-888-726-1691) for Settlement Class Members to call and obtain information about the Settlement as well as request a Notice Packet. Verita has promptly responded to each telephone inquiry and will continue to respond to Settlement Class Member inquiries via the toll-free telephone number.

4. The Initial Mailing Declaration also noted that Verita maintains a website dedicated to the Settlement (www.MissfreshSecuritiesSettlement.com). On September 6, 2024, Verita

¹ All terms with initial capitalization not otherwise defined herein have the meanings given to them in the Stipulation and Agreement of Settlement, dated as of June 12, 2024 (the “Stipulation,” ECF No. 139).

posted to the Settlement Website copies of the papers filed in support of Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation and Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses.

5. Verita will continue to maintain and, as appropriate, update the Settlement Website until the conclusion of the administration.

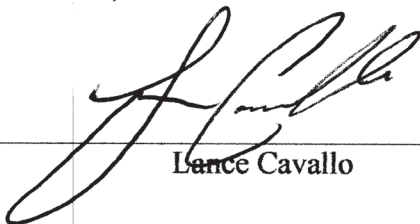
REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE

6. The Postcard Notice, Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members that requests for exclusion from the Settlement Class must be received no later than September 19, 2024. As reported in the Initial Mailing Declaration, Verita had received no requests for exclusion from the Settlement Class as of September 3, 2024. Since that date, Verita has still not received any requests for exclusion from the Settlement Class. Therefore, as of October 1, 2024, Verita has received no requests for exclusion from the Settlement Class.

7. Paragraph 17 of the Preliminary Approval Order requires objections to be filed with the Court and mailed to counsel. To date, Verita has not received any misdirected objections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Wantagh, New York on October 2, 2024.


Lance Cavallo