

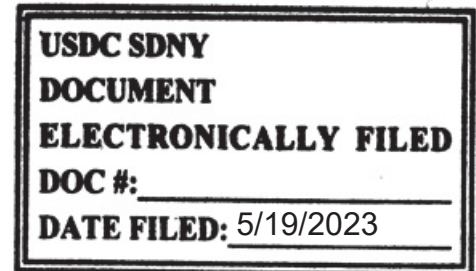
**WILSON
SONSINI**

Wilson Sonsini Goodrich & Rosati
Professional Corporation
1301 Avenue of the Americas
40th Floor
New York, New York 10019-6022
O: 212.999.5800
F: 212.999.5899

May 19, 2023

VIA CM/ECF

The Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



**Re: Dong v. Cloopen Group Holding Limited et al.,
No. 1:21-cv-10610-JGK-RWL**

Dear Judge Lehrburger:

We are counsel for Lead Plaintiff and Defendants in the above-referenced action. We write jointly to request that the Court adjourn the settlement conference scheduled for May 24, 2023. The parties submit that there is good cause for the requested adjournment. The parties' Rule 26(f) Report and Proposed Case Management Order (ECF No. 116) stated that the parties to this action participated in a mediation session with Robert A. Meyer, Esq., on February 13, 2023, and that the parties have continued settlement discussions with the assistance of Mr. Meyer. Those discussions continued productively since the parties' May 3, 2023 telephonic conference with Your Honor. Given the above, the parties request that the May 24, 2023 settlement conference be adjourned.

The parties are available at the Court's convenience if the Court has any questions.

Respectfully submitted,

BERGER MONTAGUE PC

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Michael Dell'Angelo

Sherrie R. Savett
Michael Dell'Angelo
Barbara Podell
Andrew D. Abramowitz
1818 Market Street, Suite 3500
Philadelphia, Pennsylvania 19103
Telephone: (215) 875-3000
Email: ssavett@bm.net
Email: mdellangelo@bm.net
Email: bpodell@bm.net
Email: aabramowitz@bm.net

s/ Sheryl Shapiro Bassin

Sheryl Shapiro Bassin
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (866) 974-7329
Email: sbassin@wsgr.com

The Honorable Robert W. Lehrburger
May 19, 2023
Page 2 of 3

*Counsel for Lead Plaintiff Guozhang Wang
and the Federal Class*

KIRBY McINERNEY LLP

s/ Thomas W. Elrod

Thomas W. Elrod
Ira M. Press
250 Park Avenue, Suite 820
New York, New York 10177
Telephone: (212) 371-6600
Email: telrod@kmlp.com
Email: ipress@kmlp.com

*Counsel for Lead Plaintiff Guozhang Wang
and the Federal Class*

Ignacio E. Salceda (admitted *pro hac vice*)
650 Page Mill Road
Palo Alto, California 94304
Telephone: (650) 493-9300
Facsimile: (866) 974-7329
Email: ISalceda@wsgr.com

*Counsel for Defendants Cloopen Group Holding
Limited, Changxun Sun, Yipeng Li, Xiegang
Xiong, and Cheng Luo*

WILLKIE FARR & GALLAGHER LLP

s/ Charles D. Cording

Todd G. Cosenza
Charles D. Cording
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: ccording@willkie.com
Email: tcosenza@willkie.com

*Counsel for Defendants Goldman Sachs (Asia)
L.L.C., Citigroup Global Markets Inc., China
International Capital Corporation Hong Kong
Securities Limited, Tiger Brokers (NZ) Limited,
and Futu Inc. (n/k/a Moomoo Financial Inc.)*

K&L GATES LLP

s/ Joanna A. Diakos

Joanna A. Diakos
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 536-3900
Facsimile: (212) 536-3901
Email: joanna.diakoskordalis@klgates.com

*Counsel for Defendants Cogency Global Inc.
and Colleen A. De Vries*

The Honorable Robert W. Lehrburger
May 19, 2023
Page 3 of 3

MORRISON & FOERSTER LLP

s/ Haimavathi V. Marlier

Timothy W. Blakely
Edinburgh Tower,
33/F The Landmark,
15 Queen's Road Central
Hong Kong
Telephone: +852 2585-0870
Facsimile: +852 2585-0800
Email: TBlakely@mofocom

Haimavathi V. Marlier
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Email: HMarlier@mofocom

*Counsel for Defendants Kui Zhou and
Qingsheng Zheng*

cc: All Counsel of Record (via CM/ECF)

Granted. The settlement conference scheduled for May 24, 2023 is adjourned sine die. The parties shall continue good faith efforts to settle with the help of the mediator. Should the parties at some later point desire to seek the assistance of the Court for settlement purposes, they shall so notify the Court.

SO ORDERED:

5/19/2023



**HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE**