

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DAVID RIGO FERNANDEZ, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

DOUYU INTERNATIONAL HOLDINGS
LIMITED, SHAOJIE CHEN, AND
MINGMING SU,

Defendants.

Case No. 2:23-cv-03161-SDA
Document Filed Electronically

CLASS ACTION

Motion Day: August 18, 2025

Hon. Stacey D. Adams, U.S.M.J.

**SUPPLEMENTAL DECLARATION OF SARAH EVANS CONCERNING:
(A) EMAILING AND MAILING OF NOTICE; (B) REPORT ON REQUESTS FOR
EXCLUSION AND OBJECTIONS; AND (C) CLAIMS RECEIVED TO DATE**

I, Sarah Evans, declare as follows:

1. I am a Project Manager at Strategic Claims Services, Inc. (“SCS”), a nationally recognized class action administration firm.¹ I have over nine years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and seventy-five (575) class action cases since its inception. I have personal knowledge of the facts set forth herein and, if called on to do so, I could and would testify competently thereto.

UPDATE ON MAILING/EMAILING OF NOTICE

2. Pursuant to the Court’s Order Preliminarily Approving Class Action Settlement and Providing for Notice, dated March 31, 2025 (ECF No. 79) (the “Preliminary Approval Order”), SCS was appointed and approved as the Claims Administrator in the above-captioned Action. I submit this declaration as a supplement to my earlier declaration, the Declaration of Sarah Evans Concerning: (A) Emailing and Mailing of Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections, dated July 11, 2025 (ECF No. 83-1) (the “Initial Mailing Declaration”).

3. As reported in the Initial Mailing Declaration, as of July 11, 2025, a total of 7,141 Postcard Notices had been mailed to potential Settlement Class Members either by SCS or nominees. Additionally, as noted in the Initial Mailing Declaration, 28,339 emails containing a link to the electronic Long Notice and Proof of Claim had been sent to potential Settlement Class Members by either SCS or a nominee. Since the Initial Mailing Declaration was filed, SCS has not received or fulfilled any requests from potential Settlement Class Members or nominees to be

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation of Settlement, dated July 30, 2024 (ECF No. 61) (“Stipulation”).

sent notice of the Settlement, and SCS has also not been notified by any nominees that they have sent additional notices to their clients who were potential Settlement Class Members.

4. Accordingly, not including the 108² Postcard Notices that remain undeliverable despite attempts to obtain updated mailing addresses, to date, a total of 35,372 potential Settlement Class Members or nominees were either mailed a Postcard Notice or emailed a link to the Long Notice and Proof of Claim.³

UPDATE ON TOLL-FREE PHONE LINE

5. As stated in the Initial Mailing Declaration, SCS maintains a toll-free telephone number (1-866-274-4004) for potential Settlement Class Members to call and obtain information about the Settlement. Settlement Class Members may also request a Long Notice and Proof of Claim. SCS continues to promptly respond to each telephone inquiry and address Settlement Class Members' inquiries through the administration process.

UPDATE ON SETTLEMENT WEBSITE

6. On April 25, 2025, SCS established a webpage dedicated to the Settlement on SCS's website, www.strategicclaims.net/DouYu/ ("Settlement Website"). The Settlement Website is accessible 24 hours a day, 7 days a week, allows for online claim filing, and provides instructions and a claim filing template for institutional investors. The Settlement Website sets forth the current status of this case, and important case deadlines. It also contains an important

² As reported in the Initial Mailing Declaration, 205 Postcard Notices were returned to SCS as undeliverable. The United States Postal Service provided forwarding addresses for 12, SCS was able to obtain updated address information for 85 via skip tracing, and 108 remained undeliverable after SCS's attempts to locate updated address information via skip tracing.

³ As reported in the Initial Mailing Declaration, SCS received and fulfilled two requests from potential Settlement Class Members to mail them a Long Notice and Proof of Claim. Since the Initial Mailing Declaration was filed, SCS has not received any additional requests to mail the Long Notice and Proof of Claim.

documents section with downloadable versions of the Long Notice and Proof of Claim, the Preliminary Approval Order, the Stipulation and its exhibits, and the Second Amended Class Action Complaint for Violations of the Federal Securities Laws. On July 17, 2025, SCS updated the Settlement Website to include downloadable PDF copies of the following documents: (a) Notice of Lead Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation (ECF No. 81); (b) Memorandum of Law in Support of Lead Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation (ECF No. 81-1); (c) Lead Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (ECF No. 82); (d) Memorandum of Law in Support of Lead Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Litigation Costs and Expenses (ECF No. 82-1); and (e) Joint Declaration of Phillip Kim and Casey E. Sadler in Support of: (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (ECF No. 83) and its exhibits (ECF Nos. 83-1 through 83-13, inclusive).

UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS

7. The Postcard Notice, Long Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members that written requests for exclusion were to be mailed to SCS such that they were received no later than July 28, 2025. SCS has been monitoring all mail delivered for this case. To date, SCS has not received any requests for exclusion.

8. According to the Long Notice, any Settlement Class Members wishing to object to the Settlement, any part of the Settlement, the Plan of Allocation, Lead Counsel's motion for attorneys' fees and expenses and/or the application for an award to Plaintiffs, were required to submit their objection in writing to the Court and mail copies to Lead Counsel and Defendants'

Counsel such that the papers were received on or before July 28, 2025. As noted in the Initial Mailing Declaration and attached as Exhibit E thereto, SCS had received an email from one purported Settlement Class Member stating, in part, “I also want to express my disagreement with the settlement amount[,] it's way too little versus the impact but I don't know how to proceed and time is running out.” SCS promptly responded to the purported Settlement Class Member, providing them with an electronic copy of the Long Notice and Proof of Claim, explaining that detailed information on how to object to the Settlement could be found on page 9 of the Long Notice, and instructing them to contact SCS with any further questions. To date, SCS has not received any further response from the purported Settlement Class Member. SCS has also not been notified of any objections or received any misdirected objections.

UPDATE ON CLAIMS RECEIVED TO DATE

9. The deadline for claims submission was no later than July 21, 2025, if submitted online at www.strategicclaims.net/DouYu/ or postmarked no later than July 21, 2025. As of the date of this declaration, SCS has received 12,610 claims. Based on SCS’s preliminary review of the 12,610 claims, 3,625 claims are considered valid, 8,932 claims are considered invalid, and 53 claims are deficient awaiting additional documentation required to process the claim.

10. SCS is continuing to process the claims received to date and will conduct quality assurance reviews and audits of claims. SCS’s rigorous protocols ensure that, among other things, claims that do not meet submission standards are marked as invalid, claims have required supporting documentation, duplicate claims are identified, and potentially fraudulent claims are flagged. Claimants whose claims are incomplete or invalid will be notified of SCS’s determinations in writing and given an opportunity to remedy any curable deficiencies in their claims or to contest SCS’s determinations. With these steps currently outstanding, the figures in

the above paragraph are estimates and subject to change based upon additional information being provided in the curing process.

11. Once the administration is complete, SCS will submit a declaration in conjunction with Lead Counsel's Motion for Settlement Distribution Order, which will set forth the final accepted and rejected claim numbers. *See* Stipulation, ¶6.3.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed this 8th day of August 2025, in Media, Pennsylvania.

A handwritten signature in cursive script, reading "Sarah Evans".

Sarah Evans