

**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.

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND PLAN OF ALLOCATION**

**PLEASE TAKE NOTICE** that pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 79), on August 18, 2025, at 10:00 a.m., before the Honorable Stacey D. Adams, U.S.M.J., in Courtroom PO 9 at the Frank R. Lautenberg Post Office and U.S. Courthouse, 2 Federal Square Newark, New Jersey 07102, Court-appointed lead plaintiffs Raphael Seiler and Pedro Reyes (collectively, “Lead Plaintiffs”)<sup>1</sup> will, and hereby do, apply for entry of an Order: (1) finally certifying the Settlement Class; (2) granting final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation; and (3) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund.<sup>2</sup>

This motion is based on this Notice of Motion; the concurrently filed Memorandum of Law; the concurrently filed 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 and all

---

<sup>1</sup> Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation of Settlement, dated July 30, 2024 (the “Stipulation,” ECF No. 61).

<sup>2</sup> Proposed orders will be submitted with Lead Plaintiffs’ reply papers, after the deadlines for objections and seeking exclusion have passed.

exhibits thereto; all pleadings and records on file in this Action; and other such matters as the Court may consider.

Lead Counsel conferred with Defendants' Counsel with respect to this motion. Defendants' Counsel have authorized Lead Counsel to represent that Defendants do not oppose this motion.

Dated: July 14, 2025

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Erica L. Stone

Laurence M. Rosen  
Jing Chen  
One Gateway Center  
Suite 2600  
Newark, NJ 07102  
Tel: (973) 313-1887  
Fax: (973) 833-0399  
Email: lrosen@rosenlegal.com  
jchen@rosenlegal.com

Phillip Kim (*Pro Hac Vice*)  
Erica L. Stone  
275 Madison Ave, 40th Floor  
New York, NY 10016  
Tel: (212) 686-1060  
Fax: (212) 202-3827  
Email: philkim@rosenlegal.com  
Email: estone@rosenlegal.com

**GLANCY PRONGAY & MURRAY LLP**

Joseph D. Cohen (*Pro Hac Vice*)  
Casey E. Sadler (*Pro Hac Vice*)  
1925 Century Park East, Suite 2100  
Los Angeles, CA 90067  
Tel: (310) 201-9150

Email: [jcohen@glancylaw.com](mailto:jcohen@glancylaw.com)  
[csadler@glancylaw.com](mailto:csadler@glancylaw.com)

*Co-Lead Counsel for Lead Plaintiffs and the  
Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Erica L. Stone  
Erica L. Stone