

**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.

**LEAD COUNSEL'S NOTICE OF MOTION AND MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

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 counsel, The Rosen Law Firm P.A. and Glancy Prongay & Murray LLP (collectively “Lead Counsel”)¹ will, and hereby do, apply for entry of an Order awarding attorneys’ fees and reimbursement of Litigation Expenses.²

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

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

² A proposed order will be submitted with Lead Counsel’s reply papers, after the deadline for objections has passed.

Lead Counsel conferred with Defendants' Counsel with respect to this motion. Defendants' Counsel have authorized Lead Counsel to represent that Defendants take no position with respect to this motion.

Dated: July 14, 2025

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Erica L. Stone

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*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