

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE VNET GROUP, INC. SECURITIES
LITIGATION

Case No. 1:23-cv-11187-DEH

CLASS ACTION

Hon. Dale E. Ho

**PLAINTIFFS' NOTICE AND MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND COMPENSATORY AWARDS FOR PLAINTIFFS**

For the reasons set forth in the accompanying Plaintiffs' Memorandum of Law in Support of Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Compensatory Award for Plaintiffs, Plaintiffs respectfully request that the Court enter an Order:

1. Granting an award of attorneys' fees in the amount of 33 1/3% of the gross Settlement fund, plus accrued interest;
2. Granting reimbursement of expenses to Plaintiffs' Counsel in the amount of \$56,647.20, plus accrued interest;
3. Granting a compensatory award of \$15,000 to Lead Plaintiff Wong Tan and a compensatory award of \$10,000 to additional named Plaintiff Michael Semerak.

Plaintiffs have submitted a Proposed Order for the Court's convenience.

Dated: July 23, 2026

Respectfully submitted,

POMERANTZ LLP

/s/ Christopher P.T. Tourek

Joshua B. Silverman (*pro hac vice*)
Christopher P.T. Tourek (*pro hac vice*)

Jianan Jiang (*pro hac vice*)
10 South LaSalle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Facsimile: (312) 377-1184
Email: jbsilverman@pomlaw.com
ctourek@pomlaw.com
ajiang@pomlaw.com

-and-

Jeremy A. Lieberman
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
Email: jalieberman@pomlaw.com

Lead Counsel and Proposed Class Counsel

**GLANCY PRONGAY WOLKE & ROTTER
LLP**

Gregory B. Linkh
Rebecca Dawson
745 Fifth Avenue, 5th Floor
New York, New York 10151
Telephone: (212) 745-7400
Facsimile: (212) 884-0988
Email: glinkh@glancylaw.com
rdawson@glancylaw.com

***Counsel for Additional Plaintiff Michael
Semerak and Proposed Class Counsel***

HAO LAW FIRM

Junbo Hao
Room 3-401 No. 2 Building
No. 1 Shuangliubei Street
100024 Beijing People's Republic of China
Telephone: +86 137-1805-2888
jhao@haolaw.cn

Additional Counsel for Wong Tan

CERTIFICATE OF SERVICE

On July 23, 2026, the foregoing document was filed through the Court's ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Christopher P.T. Tourek
Christopher P.T. Tourek