

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: ALIBABA GROUP HOLDING LTD.  
SECURITIES LITIGATION

Master File No. 1:20-CV-09568-GBD-JW

**PLAINTIFFS' NOTICE OF MOTION FOR  
CLASS DISTRIBUTION ORDER**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS  
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Court-appointed lead plaintiff Salem Gharsalli, and additional representative plaintiffs Laura Ciccarello, Dineshchandra Makadia, and Wusheng Hu (collectively, “Plaintiffs”), will move this Court on a date and a time to be set by the Honorable George B. Daniels, in Courtroom 11A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for entry of the concurrently filed [Proposed] Class Distribution Order.<sup>1</sup>

In support of this motion, Plaintiffs submit herewith: (1) a Memorandum of Law in Support of Plaintiffs’ Motion for Class Distribution Order; (2) the Declaration of Adam D. Walter in Support of Plaintiffs’ Motion for Class Distribution Order; and (3) the Declaration of Lauren Barnes of the Public Justice Foundation.

Defendants do not oppose this motion.

Dated: April 6, 2026

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By: /s/ Joseph D. Cohen

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<sup>1</sup> Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated October 25, 2024 (ECF No. 136-1).

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of April, 2026, 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/ Joseph D. Cohen  
Joseph D. Cohen