

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: ALIBABA GROUP LTD.
SECURITIES LITIGATION

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

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

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

PLEASE TAKE NOTICE that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 139), on March 27, 2025, at 10:00 a.m., before the Honorable George B. Daniels, in Courtroom 11A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, Lead Counsel Glancy Prongay & Murray LLP will and hereby does move the Court for entry of an Order awarding attorneys' fees in the amount of 25% of the Settlement Fund (or \$108,375,000, plus interest earned at the same rate as the Settlement Fund) and reimbursement of Litigation Expenses in the total amount of \$1,110,752.68 (comprised of \$1,025,752.68 in out-of-pocket costs incurred by Lead Counsel, and an aggregate of \$85,000 to Court-appointed lead plaintiff Salem Gharsalli (\$25,000), and additional representative plaintiffs Laura Ciccarello, Dineshchandra Makadia, and Wusheng Hu (\$20,000 each), as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).¹

This motion is based on this Notice of Motion; the Memorandum of Law in support thereof; the Declaration of Kara M. Wolke in Support of: (I) 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; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court. Defendants take no position on this motion.²

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement, dated October 25, 2024. *See* ECF No. 136-1.

² A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: February 20, 2025

GLANCY PRONGAY & MURRAY LLP

By: /s/ Kara M. Wolke

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Additional Counsel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: February 20, 2025

/s/ Kara M. Wolke
Kara M. Wolke