

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

DINO KURT, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

FLY-E GROUP, INC., ZHOU OU, and SHIWEN
FENG,

Defendants.

Case No. 1:25-cv-05017-RER-CHK

**NOTICE OF VOLUNTARY
DISMISSAL OF DEFENDANTS THE
BENCHMARK COMPANY, LLC, BIN
WANG, ALAN JACOBS, AND LUN
FENG**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A), Lead Plaintiffs Fredrik Melin and Ringkallens Holding AB, (“Plaintiffs”) hereby voluntarily dismiss Defendants The Benchmark Company, LLC, Bin Wang, Alan Jacobs and Lun Feng, from this lawsuit without prejudice. These parties have not served an answer or moved for summary judgment. The purported Class has not been certified. As such, Federal Rule of Civil Procedure 41 controls the dismissal of Defendants The Benchmark Company, LLC, Bin Wang, Alan Jacobs and Lun Feng.

Plaintiffs preserve all claims against the remaining Defendants in this action.

Dated: September 15, 2026

Respectfully submitted,

POMERANTZ LLP

By: /s/ Brian P. O’Connell

Joshua B. Silverman
(*pro hac vice* forthcoming)
Brian P. O’Connell
(*pro hac vice*)
10 S. LaSalle Street, Suite 3505
Chicago, Illinois 60603
Tel: (312) 377-1181
Fax: (312) 229-8811
jbsilverman@pomlaw.com
boconnell@pomlaw.com

Jeremy A. Lieberman
J. Alexander Hood II
James M. LoPiano
600 Third Avenue, 20th Floor
New York, New York 10016
Tel: (212) 661-1100
Fax: (212) 661-8665
jalieberman@pomlaw.com
ahood@pomlaw.com
jlopiano@pomlaw.com

Attorneys for Lead Plaintiffs

KEHOE LAW FIRM, P.C.

Michael K. Yarnoff

2001 Market Street

Suite 2500

Philadelphia, PA 19103

Tel: (215) 792-6676

myarnoff@kehoelawfirm.com

Additional Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2026, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

Dated: September 15, 2026

POMERANTZ LLP

By: /s/ Brian P. O'Connell
Brian P. O'Connell