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MEMORANDUM ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN BELLINGHAM, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. QUDIAN INC., MIN LUO, and CARL YEUNG, Defendants.	Case No.: 1:20-cv-00577-GHW **STIPULATION AND [PROPOSED] SCHEDULING ORDER**

WHEREAS, on January 22, 2020, Plaintiff Stephen Bellingham ("Plaintiff") filed a Class Action Complaint asserting federal securities claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act"), and SEC Rule 10b-5, on behalf of a putative class;

WHEREAS, pursuant to a Stipulation and Order dated April 7, 2020, the Court appointed Juan Pablo di Benedetto and Galessi Holding Corp (collectively, "di Benedetto") and Pablo Greco as Co-Lead Plaintiffs, and approved of Lead Plaintiffs' selection of Pomerantz LLP and Kahn Swick & Foti, LLC as Co-Lead Counsel (Dkt. No. 34);

WHEREAS, Lead Plaintiffs filed an Amended Complaint on June 12, 2020 (Dkt. No. 44);

WHEREAS, Defendants filed a motion to dismiss the Amended Complaint on September 4, 2020 (Dkt. No. 54);

WHEREAS, on September 13, 2022, the Court granted Defendants' motion to dismiss, with leave to file a second amended complaint within 30 days, *i.e.*, by October 13, 2022 (Dkt. No. 61);

WHEREAS, the parties have conferred and, for the convenience of the parties and the Court, hereby enter into the following stipulation regarding the schedule for the filing of an second amended complaint and the defendants' response thereto;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the undersigned parties, subject to the Court's approval, as follows:

1. Lead Plaintiffs shall file a Second Amended Complaint no later than November 14, 2022;

2. Defendants shall file their pre-motion conference request related to its anticipated motion to dismiss ("Defendants' Pre-Motion Letter"), pursuant to Rule 2C of the Court's Individual Rules of Practice in Civil Cases, no later than December 12, 2022;

3. Lead Plaintiffs shall file their response to Defendants' Pre-Motion Letter no later than December 19, 2022;

4. Defendants shall move to dismiss the Amended Complaint no later than January 20, 2023 or 14 days after the Court's ruling on Defendant's Pre-Motion Letter, whichever is later;

5. Lead Plaintiffs shall file any opposition to such motion no later than 42 days after Defendants files its motion to dismiss;

6. Defendants shall file their reply to any such opposition no later than 28 days after Lead Plaintiffs' opposition to their motion to dismiss; and

7. This stipulation is without prejudice to any of the parties' rights or defenses in this action.

Dated: October 7, 2022

Respectfully submitted,

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Co-Lead Counsel for Co-Lead Plaintiff Juan Pablo di Benedetto, Galessi Holding Corp and Pablo Greco

Application granted in part. Lead Plaintiffs are granted leave to file their Second Amended Complaint no later than November 14, 2022. Defendants may file their pre-motion conference request related to their anticipated motion to dismiss ("Defendants' Pre-Motion Letter") no later than December 12, 2022. In accordance with the Court's Individual Rule 2(C)(i), Plaintiffs must submit any letter in response to Defendants' letter within five days of the filing of Defendants' letter. Upon receipt of the parties' letter(s), the Court will determine whether to grant or deny the request to file the motion, or whether to schedule a pre-motion conference on the matter. At that time, the Court will set deadlines, as necessary, for any briefing schedule concerning Defendants' anticipated motion. This application does not comply with the Court's Rule 1(F), which requires the filing of a letter together with any requested order or application. The parties are again directed to review and comply with the Court's Individual Rules.

SO ORDERED

Dated: October 9, 2022

GREGORY H. WOODS
United States District Judge