IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

KIMBERLY BELTRAN, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SOS LIMITED, YANDAI WANG, and ERIC H. YAN,

Defendants.

Civil Action No. 1:21-cv-7454-RBK-MJS

Civil Action

(Document Filed Electronically)

CLASS ACTION

MES

[PROPOSED] ORDER GRANTING JOINT SCHEDULING STIPULATION

THIS MATTER having been brought before the Court by way of a joint scheduling stipulation filed by SOS Limited ("SOS"), Yandai Wang, and Eric H. Yan (collectively, "Defendants"), with consent from Lead Plaintiffs Shawn Ho and William Rodgers ("Plaintiffs"), by and through the parties' respective counsel, for an Order granting the stipulated schedule for the filing of an amended complaint, a motion to dismiss, an opposition to the motion to dismiss, and a reply in support of the motion to dismiss; and the Court having considered the parties' submissions; and for good cause shown:

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IT IS on this 9th day of December, 2021,

ORDERED that the parties' joint scheduling stipulation is hereby **GRANTED**; and it is further

ORDERED that Defendants are not required to answer, move, or otherwise respond to the current Complaint in this action; and it is further

ORDERED that Plaintiffs shall file an Amended Complaint, or else notify the Court of their intention not to file an Amended Complaint, on or before February 18, 2022; and it is further

ORDERED that Defendants shall answer or otherwise respond to the Amended Complaint (or to the current Complaint, if Plaintiffs elect not to amend it) on or before April 8, 2022; and it is further

ORDERED that if Defendants file a motion to dismiss, Plaintiffs shall file any opposition thereto on or before June 3, 2022; and it is further

ORDERED that Defendants shall file any reply in support of the motion to dismiss on or before July 6, 2022; and it is further

ORDERED that pending the determination of any motion to dismiss by Defendants, no status conference shall be held, no status report shall be required to be filed, and pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, no discovery or other proceeding shall take place unless and until

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the Court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party.

Hon. Robert B. Kugler, U.S.D.J.

Matthew & Skahill, USMI