

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

<p>KIMBERLY BELTRAN, Individually and On Behalf of All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>SOS LIMITED, YANDAI WANG, and ERIC H. YAN,</p> <p>Defendants.</p>	<p>Civil Action No. 1:21-cv-7454-RBK- MJS</p> <p>Civil Action</p> <p>(Document Filed Electronically)</p> <p>CLASS ACTION</p>
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JOINT SCHEDULING STIPULATION

Lead Plaintiffs Shawn Ho and William Rodgers (“Plaintiffs”), and Defendants SOS Limited (“SOS”), Yandai Wang, and Eric H. Yan (collectively, “Defendants”), by and through their respective counsel, respectfully submit this Joint Scheduling Stipulation setting forth a 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.

WHEREAS, this putative securities class action was commenced on March 30, 2021, on behalf of investors that purchased or otherwise acquired publicly traded securities of SOS between July 22, 2020, and February 25, 2021, both dates inclusive;

WHEREAS, this action is subject to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 (the “PSLRA”);

WHEREAS, on November 2, 2021, this Court entered an Order (Dkt. No. 16) appointing Plaintiffs as Co-Lead Plaintiffs and their counsel as Co-Lead Counsel;

WHEREAS, Plaintiffs presently intend to file an Amended Complaint;

WHEREAS, Defendants presently intend to move to dismiss any complaint in this action;

WHEREAS, pursuant to the PSLRA, all discovery and other proceedings in this action are stayed pending the determination of Defendants’ planned motion to dismiss;

WHEREAS, due to the holiday season, as well as Plaintiffs’ need to complete a thorough investigation in this matter to meet the heightened pleading standards of the PSLRA, good cause exists to grant an extension of time to file an Amended Complaint, and no previous extension has been granted as to this step;

NOW, THEREFORE, Plaintiffs and the Defendants stipulate and agree, subject to approval of the Court, as follows:

1. In the interest of judicial economy and preserving the resources of the parties and the Court, Defendants are not required to answer, move, or otherwise respond to the current Complaint in this action. (Pursuant to waivers executed by Defendants on December 2 and 6, 2021, their answer or other response otherwise would have been due on or about February 1, 2022.)

2. Defendants waive none of their rights, arguments, or defenses by not answering, moving, or otherwise responding to the current Complaint, except that Defendants have waived service of process. *See* Dkt. Nos. 19-21.

3. Plaintiffs shall file an Amended Complaint on or before February 18, 2022, or else notify the Court by that date of their intention not to file an Amended Complaint;

4. 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.

5. If Defendants file a motion to dismiss, Plaintiffs shall file any opposition thereto on or before June 3, 2022.

6. Defendants shall file their reply in support of the motion to dismiss on or before July 6, 2022.

7. Pending determination of the Defendants' planned motion to dismiss, the parties request that no status conference be held, no status report be required to be filed, and pursuant to the PSLRA, no discovery or other proceeding shall take place, unless and until 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.

Dated: December 7, 2021

Respectfully submitted,

/s/ Jeffrey S. Jacobson

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