

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

MICHAEL RAGAN, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

FARFETCH LIMITED, JOSÉ NEVES,  
ELLIOT JORDAN, and STEPHANIE PHAIR,

Defendants.

Case No.: 8:23-cv-02857-MJM

Hon. Matthew J. Maddox

**STIPULATION AND ~~PROPOSED~~ ORDER APPOINTING CO-LEAD PLAINTIFFS  
AND CO-LEAD COUNSEL**

WHEREAS, on October 20, 2023, Plaintiff Michael Ragan commenced the above-captioned action (the “Action”) by filing the Complaint against the above-captioned Defendants, alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Farfetch Limited (“Farfetch”) (Dkt. No. 1);

WHEREAS, as a putative class action alleging violations of the federal securities laws, the Action is governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), which provides, in relevant part, that any putative Class member may move for appointment as Lead Plaintiff in the Action within 60 days of publication of notice of pendency of the Action—here, on or before December 19, 2023 (15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(aa));

WHEREAS, on December 19, 2023, Plaintiff Jasmine Wu commenced a nearly identical action (the “*Wu* Action”) by filing a substantially similar complaint against the Defendants in the United States District Court for the Southern District of New York, Case No. 1:23-cv-10982, alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Farfetch (*Wu* Dkt. No. 1).

WHEREAS, six members of the putative Class filed motions seeking appointment as Lead Plaintiff pursuant to the PSLRA: (i) Fernando Sulichin individually and on behalf of Lyxor Overseas Holdings Ltd & Cinergy Advisors Ltd (“Mr. Sulichin”) (Dkt. Nos. 35); (ii) Yuanzhe Fu (“Ms. Fu”) (Dkt. No. 38); (iii) Eduardo Archer Veloso Martins and Renoporto-Investimentos Imobiliários, LDA (“Martins”) (Dkt. No. 36); (iv) Dr. Michael Bievetski (“Bievetski”) (*Wu* Dkt. No. 5); (v) Tamim Altamimi (“Altamimi”) (Dkt. No. 33); and (vi) Kaundria West (“West”) (Dkt. No. 34);

WHEREAS, the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(iii), provides, *inter alia*, that the most adequate plaintiff to serve as Lead Plaintiff is, in the determination of the Court, the “person or group of persons” that has the largest financial interest in the relief sought by the class and otherwise satisfies the relevant requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”);

WHEREAS, 15 U.S.C. § 78u-4(a)(3)(B)(iv) provides that, subject to the approval of the Court, the most adequate plaintiff will select and retain counsel to represent the class;

WHEREAS, Movants Martins, Bievetski, Altamimi, and West subsequently withdrew their motions and/or filed notices of non-opposition confirming that they did not possess the “largest financial interest” in the relief sought by the class (Dkt. Nos. 43, 44, 47, 48);

WHEREAS, Mr. Sulichin and Ms. Fu are the only remaining movants with pending motions for lead plaintiff;

WHEREAS, Mr. Sulichin and Ms. Fu have each provided sworn Certifications pursuant to the PSLRA in support of their respective applications for Lead Plaintiff appointment, setting forth, *inter alia*, their transactions in Farfetch securities, and each has alleged a significant financial interest in this litigation;

WHEREAS, having reviewed one another's submissions to the Court, Mr. Sulichin and Ms. Fu believe that they both satisfy the requirements of Rule 23;

WHEREAS, having reviewed one another's submissions to the Court, Mr. Sulichin and Ms. Fu believe that it is in the best interests of the Class for them to serve as Co-Lead Plaintiffs and for their respective selections of Levi & Korsinsky, LLP ("Levi & Korsinsky") and Hagens Berman Sobol Shapiro LLP ("Hagens Berman") to serve as Co-Lead Counsel;

WHEREAS, courts around the country have endorsed stipulations among competing lead plaintiff movants as promoting the statutory purposes of the PSLRA, and have permitted independent lead plaintiff movants to join together where movants "concluded that a protracted dispute concerning lead plaintiff appointment . . . [was] not in the best interests of the class and that jointly prosecuting [the] litigation would be appropriate and assist with the speedy commencement of [the] litigation." *In re Facebook, Inc. Sec. Litig.*, No. 5:18-cv-01725-EJD, ECF 56 at 2-3 (N.D. Cal. Aug. 3, 2018) (approving stipulation of lead plaintiff movants); *Pizzuto v. Homology Meds., Inc.*, No. 2:22-cv-01968-FLA-JPR, ECF 38 (C.D. Cal. July 1, 2022) (same); *Deputy v. Akebia Therapeutics, Inc., et al.*, No. 1:22-cv-01411-AMD-VMS, ECF Order (E.D.N.Y. June 28, 2022) (appointing co-lead plaintiffs pursuant to stipulation); *In re Grab Holdings Limited Securities Litigation*, No. 1:22-cv-02189-VM, ECF 39 (S.D.N.Y. Jun. 7, 2022) (same); *Terenzini v. GoodRx Holdings, Inc.*, No. 2:20-cv-11444-DOC-PD, ECF 65 (C.D. Cal. Apr. 8, 2021) (same); *Zhou v. Faraday Future Intelligent Elec. Inc. f/k/a Prop. Sols. Acquisition Corp.*, No. 2:21-cv-09914-CAS-JC, ECF 32-33 (C.D. Cal. Mar. 7, 2022) (same).

WHEREAS, counsel for Mr. Sulichin and Ms. Fu have met-and-conferred with counsel for Defendants in regards to the foregoing and Defendants take no position with respect to the resolution of Mr. Sulichin and Ms. Fu pending motions for lead plaintiff;

IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court's approval, as follows:

1. Mr. Sulichin and Ms. Fu are hereby appointed Co-Lead Plaintiffs in this Action and any subsequently filed or transferred actions that are consolidated with this Action, pursuant to 15 U.S.C. §78u-4(a)(3)(B); and

2. Co-Lead Plaintiffs' selections of Levi & Korsinsky and Hagens Berman as Co-Lead Counsel are hereby approved.

**IT IS SO STIPULATED.**

Dated: January 12, 2024

Respectfully submitted,

**LEVI & KORSINSKY, LLP**

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*Counsel for Lead Plaintiff Movant Fernando  
Sulichin and [Proposed] Co-Lead Counsel for the  
Class*

Dated: January 12, 2024

**HAGENS BERMAN SOBOL SHAPIRO LLP**

/s/ Lucas E. Gilmore  
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and [Proposed] Co-Lead Counsel for the Class*

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*Liaison Counsel for Lead Plaintiff Movant  
Yuanzhe Fu*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 17th, 2024

/S/

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THE HONORABLE MATTHEW J. MADDOX  
UNITED STATES DISTRICT JUDGE