

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

SUVEGA SRINIVASAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

COTY INC., SUE NABI, and LAURENT
MERCIER,

Defendants.

Case No.: 1:26-cv-02343-RA-VF [rel. 1:26-
cv-02931-RA; 1:26-cv-04034-RA]

CLASS ACTION

Hon. Ronnie Abrams

JIAN JUN CHEN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

COTY INC., SUE NABI, and LAURENT
MERCIER,

Defendants.

Case No. 1:26-cv-04034-RA [rel. 1:26-cv-
02343-RA-VF]

CLASS ACTION

Hon. Ronnie Abrams

**STIPULATION AND [PROPOSED] ORDER CONSOLIDATING RELATED ACTIONS,
APPOINTING CO-LEAD PLAINTIFFS, AND APPROVING SELECTION OF
CO-LEAD COUNSEL**

Lead Plaintiff Movants Ksenia Solozobova (“Solozobova”) and Mike Logelin (“Logelin”), by and through their undersigned counsel, hereby stipulate as follows in support of their request for consolidation of the above-captioned related actions (the “Related Actions”), appointment as Co-Lead Plaintiffs and approval of their selection of Co-Lead Counsel:

WHEREAS, on March 23, 2026, Suvega Srinivasan commenced the first-filed of the Related Actions, styled *Srinivasan v. Coty Inc. et al.*, No. 1:26-cv-02343-RA-VF (“*Srinivasan*”), alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Coty Inc. (“Coty”) (*see Srinivasan*, Dkt. No. 1);

WHEREAS, on May 14, 2026, Jian Jun Chen commenced a second securities class action alleging substantially the same wrongdoing as *Srinivasan* against the same defendants, styled *Chen v. Coty Inc.*, No. 1:26-cv-04034-UA (“*Chen*”), likewise alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Coty (*see Chen*, Dkt. No. 1);

WHEREAS, Federal Rule of Civil Procedure 42(a) (“Rule 42(a)”) provides that a court may order all actions consolidated if they involve “a common question of law or fact”;

WHEREAS, the Related Actions involve common legal and factual questions, such that efficiency and consistency will result from their consolidation;

WHEREAS, as putative class actions alleging violations of the federal securities laws, the Related Actions are governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), which provides, *inter alia*, that any putative Class member may move for appointment as Lead Plaintiff in this litigation within 60 days of publication of notice (the “Notice”) of the pendency of the litigation—here, on or before May 22, 2026 (*see* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(aa));

WHEREAS, on May 22, 2026, three movants filed timely, separate motions pursuant to the Notice, seeking appointment as Lead Plaintiff and approval of their respective selections of Lead Counsel: (i) Solozobova (*Srinivasan*, Dkt. No. 8); (ii) Logelin (*Srinivasan*, Dkt. No. 15); and (iii) Daniel Stripling (“Stripling”) (*Srinivasan*, Dkt. No. 12);

WHEREAS, on June 5, 2026, Stripling withdrew his competing motion (*see* Dkt. No. 19);

WHEREAS, accordingly, Solozobova and Logelin are the only remaining movants still seeking appointment as Lead Plaintiff in this litigation;

WHEREAS, the PSLRA 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”) (15 U.S.C. § 78u-4(a)(3)(B)(iii)(I));

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

WHEREAS, Solozobova and Logelin 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 Coty securities (*see Srinivasan*, Dkt. Nos. 10-1; 18-2);

WHEREAS, Solozobova claims to have sustained losses of approximately \$81,673.87 as a result of Defendants’ alleged wrongful conduct (*see Srinivasan*, Dkt. No. 10-2);

WHEREAS, Logelin claims to have sustained losses of approximately \$150,407.00 as a result of Defendants’ alleged wrongful conduct (*see Srinivasan*, Dkt. No. 18-1);

WHEREAS, accordingly, Solozobova and Logelin have each alleged a significant financial interest in the outcome of this litigation;

WHEREAS, Solozobova and Logelin submit that they are also each qualified to serve as Lead Plaintiffs in this case given, among other things, their respective Lead Plaintiff motion submissions (*Srinivasan*, Dkt. Nos. 8–11, 15–18);

WHEREAS, having reviewed one another’s submissions to the Court, Solozobova and Logelin believe that they each satisfy the typicality and adequacy requirements of Rule 23;

WHEREAS, after reviewing each other’s submissions to the Court, Solozobova and Logelin—as the only two remaining movants in contention for appointment as Lead Plaintiff—have decided that it is in the best interests of the Class to join together as Co-Lead Plaintiffs and for their respective selections of Levi & Korsinsky, LLP (“Levi & Korsinsky”) and Pomerantz

LLP (“Pomerantz”) to serve as Co-Lead Counsel, in that it will, *inter alia*, allow their counsel to pool their resources to immediately and efficiently commence prosecution of this litigation and avoid further delay associated with a protracted lead plaintiff dispute;

WHEREAS, Solozobova and Logelin are committed to supervising the conduct of this litigation by their counsel and to ensuring that counsel coordinate appropriately, prosecute the litigation efficiently, and avoid any duplication of effort in the conduct of the litigation; and

WHEREAS, courts have endorsed stipulations among competing Lead Plaintiff movants, like here, as promoting the statutory purposes of the PSLRA, and have permitted “independent lead plaintiff movants [to] join together to help ensure that adequate resources and experience are available to the prospective class in the prosecution of th[e] action and because [e]mploying a co-lead plaintiff structure . . . will also provide the proposed class with the substantial benefits of joint decision-making.” *In re Rockwell Med., Inc. Sec. Litig.*, No. 1:16-cv-01691-RJS, Dkt. No. 18 at 2–3 (S.D.N.Y. May 20, 2016) (internal quotation marks omitted) (citing *Pirelli Armstrong Tire Corp. Retiree Med. Benefits Tr. v. LaBranche & Co.*, 229 F.R.D. 395, 420 (S.D.N.Y. 2004)); *see also Martin v. BioXcel Therapeutics, Inc. et al.*, No. 3:23-cv-00915 (D. Conn. Oct. 4, 2023) (approving joint motion of movants, finding “both the most adequate representatives of the class and thus appointing them as co-Lead Plaintiffs will best serve the interests of the class”); *In re Grab Holdings Ltd. Sec. Litig.*, No. 1:22-cv-02189-VM (S.D.N.Y.), Dkt. No. 39 (approving stipulation of competing lead plaintiff movants to serve as co-lead plaintiffs and approving their selection of co-lead counsel); *In re Millennial Media, Inc. Sec. Litig.*, 87 F. Supp. 3d 563, 570–71 (S.D.N.Y. 2015) (“A co-lead plaintiff structure best protects the interests of the class . . . and gives the class the advantages of the combined knowledge, experience, and judgment of both lead plaintiffs.” (collecting cases));

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

1. Pursuant to Rule 42(a), the Related Actions (*Srinivasan* and *Chen*) are hereby consolidated for all purposes.

2. These actions shall be referred to herein as the “Consolidated Action.” This Order shall apply to the Consolidated Action and to each case that is subsequently filed in this Court that relates to the same subject matter as in the Consolidated Action.

3. Every pleading in this Consolidated Action, and any related action that is consolidated with it, shall hereafter bear the following caption:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE COTY INC. SECURITIES
LITIGATION

Case No. 1:26-cv-02343-RA-VF

THIS DOCUMENT RELATES TO:

CLASS ACTION

[TITLE OF DOCUMENT]

4. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Document Relates To:”. When the document applies to some, but not all, of the actions, the document shall list, immediately after the phrase “This Document Relates To:”, the docket number for each individual action to which the document applies, along with the name of the first-listed plaintiff in said action;

5. Solozobova and Logelin’s motions for appointment as Lead Plaintiff and approval of selection of counsel (*Srinivasan*, Dkt. Nos. 8 and 15) are granted, and Solozobova and Logelin are hereby appointed Co-Lead Plaintiffs in the Consolidated Action and any subsequently filed or

transferred actions that are consolidated with the Consolidated Action, pursuant to 15 U.S.C. § 78u-4(a)(3)(B); and

6. Co-Lead Plaintiffs' selections of Pomerantz and Levi & Korsinsky as Co-Lead Counsel for the Class in this litigation are hereby approved.

IT IS SO STIPULATED.

Dated: June 5, 2026

Respectfully Submitted,

LEVI & KORSINSKY, LLP

/s/ Adam M. Apton
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*Lead Counsel for Ksenia Solozobova and
[Proposed] Co-Lead Counsel for the Class*

Dated: June 5, 2026

POMERANTZ LLP

/s/ J. Alexander Hood II*
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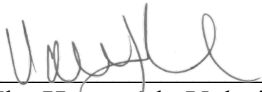
*Counsel for Mike Logelin and [Proposed]
Co-Lead Counsel for the Class*

** With Consent per ECF Rule 8.5*

The Clerk of Court is respectfully directed to close the motions at ECF Nos. 8, 12, and 15.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 10, 2026



The Honorable Valerie Figueredo
United States Magistrate Judge