

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION

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MICHAEL PLUTTE, Individually and on Behalf of All Others Similarly Situated,	: Index No. 655436/2018 The Honorable Jennifer G. Schecter, J.S.C.
	:
Plaintiff,	: PART 54
	:
vs.	: Motion Sequence No. 004
	:
SEA LIMITED, FORREST XIAODONG LI, GANG YE, TONY TIANYU HOU, COLLEEN A. DE VRIES, YUXIN REN, NICHOLAS A. NASH, DAVID HENG CHEN : SENG, KHOON HUA KUOK, GOLDMAN : SACHS (ASIA) L.L.C., MORGAN STANLEY : & CO. INTERNATIONAL PLC, CREDIT : SUISSE SECURITIES (USA) L.L.C., CLSA : LIMITED, CITIGROUP GLOBAL : MARKETS INC., COWEN AND COMPANY, : LLC, NOMURA SECURITIES : INTERNATIONAL, INC., PIPER JAFFRAY : & CO., STIFEL NICOLAUS & COMPANY, : INCORPORATED, PT MADIRI : SEKURITAS, TUDOR, PICKERING, HOLT : & CO. SECURITIES, INC., BDO CAPITAL : & INVESTMENT CORPORATION, : CATHAY SECURITIES CORPORATION : OFFSHORE SECURITIES UNIT, DBS : BANK LTD., VIET CAPITAL SECURITIES : JSC and COGENCY GLOBAL INC., : Defendants.	: AFFIDAVIT OF MICHAEL PLUTTE IN SUPPORT OF SETTLEMENT AND APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES
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STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

I, Michael Plutte, hereby state the following:

1. I am one of the plaintiffs in the above-captioned action. I submit this declaration in support of settlement and application for award of attorneys' fees and expenses and my request for a service award to reflect the significant time and effort I put into representing the Class. I have personal knowledge of the matters referred to herein.

2. I purchased 95 shares of Sea Limited stock on October 10, 2017.

3. During the course of this litigation, I have spent approximately 25 hours assisting counsel in developing and prosecuting this case. These tasks have included:

(a) Initial communications with counsel regarding the potential case; phone calls and correspondence with counsel concerning my stock transactions; communications concerning plaintiff duties, responsibilities and potential exposure; and independently researching these issues;

(b) Providing evidence of my trading records and stock ownership of Sea Limited;

(c) Reviewing draft complaints, and discussions with counsel;

(d) Reviewing the draft amended complaint, and discussions with counsel;

(e) Discussing settlement issues/strategy with counsel; and

(f) Communications with counsel regarding the settlement process and procedure, allocation of proceeds, notice and claim forms, final hearing, my review and completing settlement papers.

4. Based on my familiarity with the case, my review of significant documents filed in the case and my extensive communications with counsel, Stephen J. Oddo, I believe I am in a good

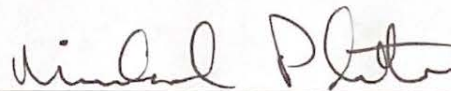
position to comment on the settlement and request for attorneys fees. I believe that the \$10,750,000 recovery in this case is very good. I understand the difficulty of proving these cases at trial and understand that even in a strong case the class could recover nothing. I also appreciate that a settlement now guarantees that the class members will recover something. This is important to me. On these ground, and others, I fully support the settlement.

5. In addition, based on my regular communications with Mr. Oddo and my review of the documents filed in this case, I believe that counsel should be awarded their requested fee of 33 1/3% of the settlement. I understand that counsel has been paid nothing to date and has expended significant amount of time and money on this matter. In my opinion, counsel did an excellent job in this case and should be compensated accordingly.

6. Finally, I respectfully request that the Court approve the Plaintiff's service award of \$2,500. As indicated above, I estimate that I devoted approximately 25 hours to the prosecution of this case. The requested reimbursement represents approximately \$100 per hour, which is consistent with what I earned as a global product manager. Accordingly, I respectfully request approval of the \$2,500 service award for the time expended in the prosecution of this case on behalf of the Class.

7. I did not commence this Action to obtain any special benefit, nor has any such benefit ever been promised to me. I have not received, been promised or offered and will not accept any form of compensation, directly or indirectly, for prosecuting or for serving as a representative party in this class action except for (a) such damages or other relief as the Court may award me as a member of the Class; or (b) such fees, costs, or other payments as the Court expressly approves to be paid to me or on my behalf.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 11 day of February, 2021, at Oak Creek, Wisconsin.



MICHAEL PLUTTE

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Subscribed and sworn to (or affirmed) before me on this
16 th day of February, 2021, by Michael Plutte
proved to me on the basis of satisfactory evidence to be
the person who appeared before me.



Signature Andrea F. Baker (Seal)

My commission expires: 10/08/2024

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

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PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affidavit was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in this affidavit, exclusive of the caption, title, signature block, and this Certification, is 588 words.

DATED: February 25, 2021

ROBBINS GELLER RUDMAN
& DOWD LLP
JOSEPH RUSSELLO

/s/ Joseph Russello

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