

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER**

GUANG HUANG, individually, and derivatively on  
behalf of BBSHARES CAPITAL MANAGEMENT  
LIMITED,

Plaintiff,

-against-

JINGJING ZHOU, HONGTAO (JASON) QIAO, and  
BB MATRIX HOLDINGS PTE. LTD,

Defendants,

and

BBSHARES CAPITAL MANAGEMENT LIMITED,

Nominal Defendant.

Index No. 61185/2022  
(Jamieson, J.S.C.)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying July 14, 2025 Memorandum of law; the July 14, 2025 Affirmation of Sandra L. Musumeci and the exhibits attached thereto; and upon all the prior pleadings and submissions herein, Defendants Jingjing Zhou and Hongtao (Jason) Qiao will move this Court (Jamieson, J.S.C.) at the Courthouse, Supreme Court of the State of New York, County of Westchester, 111 Dr. Martin Luther King Jr. Boulevard, White Plains, New York 10601 on August 1, 2025, or as soon as counsel may heard, for an order under CPLR 3211 dismissing Plaintiff Guang Huang's Second Amended Complaint (NYSCEF No. 133).

PLEASE TAKE FURTHER NOTICE that under CPLR 2214(b) answering papers, if any, shall be served at least seven (7) days before the return date of this Motion, and reply papers, if any, shall be served at least one (1) day before the return date of this Motion.

Dated: New York, NY  
July 14, 2025

Respectfully submitted,

By: /s/ Sandra L. Musumeci

Sandra L. Musumeci

Aaron J. Gold

Edwin A. Herod

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*Counsel for Individual Defendants*

*Jingjing Zhou and Hongtao (Jason) Qiao*

To: All Counsel of Record (by NYSCEF)