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

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In the Matter of the Application of

YANG ANG, RENYI CAO, FENGHUA CHEN,  
WEILUN CHEN, JIANG CHEN, JINGKE CHEN,  
WEIQI CHEN, XIULING CHEN, GUOJIAN  
CHEN, JIAN CHENG, JIHONG CUI, WENTING  
CUI, ZHENHUI CUI, CHENGLING DENG,  
YIHONG DING, JING FU, JUANJUAN FU,  
HONGMEI FU, BO GAO, DAN GAO, ZIMING  
GU, YAN GU, JIANGHONG HE, MINGYUAN  
HUA, ZEHONG HUANG, BEI HUANG,  
XIAOYAN HUANG, JIANPING JIANG, YAN  
JIN, XIAONAN JING, JUNYAN KANG, LIHUA  
KUI, QIN LI, YUNSHAN LI, QIANG LI,  
XIAOHONG LI, ZHEN LI, HAOJUN LING,  
XIAOYANG LIU, FEN LIU, YIHUA LIU, JIN  
LIU, YUFEI LUO, KAI LUO, HONGXIA MA,  
ZHENBIN MO, ZHENNING MU, QINGLI  
PANG, JING PENG, NING QU, YAN REN,  
ANQI SHI, YUJIA SHI, LI SHI, LING SU,  
HAITAO SUN, ZHAOHONG SUN, YANFU  
SUN, JIAN SUN, LI SUN, LI SUN, WEI SUN,  
XIANGQIONG TANG, RUJUN TAO, JING  
TIAN, AIRONG TIAN, QIJIA TONG, XIAONAN  
WANG, FUBAO WANG, YE WANG,  
XIAOTING WANG, AIHUA WANG, ZHEN  
WANG, BIQING WANG, QUN WANG, YIYU  
WANG, YINGXUAN WANG, XUEMEI WEI,  
SHUZHEN WU, JIAPING WU, ZHAOHUI WU,  
DONG WU, ZHENG XI, ZUOHAN XIAOHOU,  
YAN XIAO, XIAO XIAO, HONG XIE, YUNING  
XIE, GUOFEN XU, DONGYAN XU, PEI XU,  
ZIXI XU, JIEWEI XU, LING XUE, YAN YANG,  
QINGFA YANG, LEI YANG, ZHIWEI YAO,  
YIQING YE, JIANJUN YIN, JIA YU, YI YUAN,  
LIU YUAN, HU ZENG, HAIYING ZENG,  
XIAOLIN ZENG, MEILING ZHAN, WEI  
ZHANG, YANPING ZHANG, WEIFAN ZHANG,  
YAN ZHANG, JIE ZHANG, JIANBO ZHANG,  
JIEYUN ZHANG, XIAOHUI ZHANG, YAN  
ZHANG, YAN ZHANG, YUCHI ZHANG,  
MUMU ZHAO, ZICHU ZHENG, QUN ZHOU,

Index No. 156339/2018

**STIPULATION**

Motion Sequence No. 1

IAS Part 39

(Scarpulla, J.)

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JINGXING ZHOU, MEI ZHOU, and YAMIN  
ZHU,

Petitioners,

-against-

U.S. IMMIGRATION FUND-NY LLC, 701 TSQ  
1000 FUNDING GP, LLC, 701 TSQ 1000  
FUNDING, LLC, and NICHOLAS  
MASTROIANNI,

Respondents.

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WHEREAS attorneys for all parties identified in the caption above (individually a “Party,” and collectively, the “Parties”) have discussed and agreed upon proposed case deadlines and a proposed schedule for certain events relevant to this dispute;

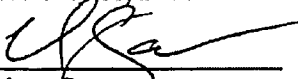
The Parties, through their undersigned counsel, hereby STIPULATE AND AGREE as follows:

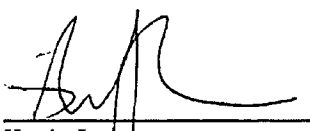
1. Prior to August <sup>2nd</sup>, 2018 (the “Limitation Date”), Respondents will not:
  - a. close, or enter into any binding commitments requiring them to close, the reinvestment transaction relating to the project at 1568 Broadway (702 Times Square), New York, New York, as described in the consent solicitation proposal circulated to Petitioners on June 5, 2018, as supplemented on June 25, 2018 (“Proposal”), but, for the avoidance of doubt, nothing in this Stipulation shall prevent Respondents from conducting negotiations and taking any and all preparatory steps to closing any such transaction; and
  - b. notify United States Citizenship and Immigration Services (“USCIS”) that investors who did not approve the Proposal have decided not to redeploy their

capital or to maintain it at risk, except that in response to an inquiry from USCIS Respondents may inform USCIS of the terms of the Proposal and a pending dispute involving the effectiveness of the Proposal;

2. Respondents shall file and serve their papers in opposition to Petitioners' Verified Petition for Injunction In Aid of Arbitration Pursuant to CPLR 7502(c) and 6301 (the "Petition") on or before July 20, 2018;
3. Petitioners shall file and serve their reply papers in further support of the Petition on or before July 27, 2018;
4. Subject to the Court's availability, the hearing on the Petition shall be held on August 2, 2018, at 11 a.m., or on such other date and time as convenient for the Court;
5. Except as stipulated herein, Petitioners otherwise withdraw their application for the expedited issuance of a temporary restraining order; and
6. The Parties expressly reserve the right to request an advance of the Limitation Date to a date before August 3, 2018 or an extension of the Limitation Date beyond August 2, 2018, either by agreement of the Parties or through judicial intervention, if circumstances warrant.

Dated: July 11, 2018.

  
 Matthew Sava  
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 New York, NY 10119  
 P: 212-858-9968  
 Attorneys for Petitioners

  
 Kevin Logue  
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 200 Park Avenue  
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 P: 212-318-6000  
 Attorneys for Respondents

SO ORDERED:

  
 J.S.C.  
 HON. SALIANN SCARPULLA <sub>3</sub>

JUL 13 2018