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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DOUG KEALLY, Individually and on
Behalf of All Others Similarly
Situated,

Plaintiff,

v.

XUNLEI LIMITED, SEAN
SHENGLONG ZOU, TAO THOMAS
WU, J.P. MORGAN SECURITIES
LLC, CITIGROUP GLOBAL
MARKETS INC., and
OPPENHEIMER & CO. INC.

Defendants.

No.

CLASS ACTION

**COMPLAINT FOR
VIOLATION OF THE
FEDERAL SECURITIES
LAWS**

DEMAND FOR JURY TRIAL

1 Plaintiff Doug Keally (“Plaintiff”), individually and on behalf of all other
2 persons similarly situated, by his undersigned attorneys, for his complaint against
3 defendants, alleges the following based upon personal knowledge as to himself
4 and his own acts, and information and belief as to all other matters, based upon,
5 *inter alia*, the investigation conducted by and through his attorneys, which
6 included, among other things, a review of the defendants’ public documents,
7 conference calls and announcements made by defendants, United States Securities
8 and Exchange Commission (“SEC”) filings, wire and press releases published by
9 and regarding Xunlei Limited (“Xunlei” or the “Company”), analysts’ reports and
10 advisories about the Company, and information readily obtainable on the Internet.
11 Plaintiff believes that substantial evidentiary support will exist for the allegations
12 set forth herein after a reasonable opportunity for discovery.

13 **NATURE OF THE ACTION**

14 1. This is a federal securities class action brought on behalf of a class
15 consisting of all persons and entities, other than defendants and their affiliates,
16 who purchased Xunlei American Depository Shares (“ADSs”) (1) pursuant and/or
17 traceable to the Company’s registration statement and prospectus (defined below)
18 issued in connection with the Company’s initial public offering on or about June
19 24, 2014 (the “IPO” or the “Offering”); and/or (2) on the open market between
20 June 24, 2014 and May 20, 2015, inclusive (the “Class Period”), seeking to
21 recover compensable damages caused by Defendants’ violations of the Securities
22 Act of 1933 (the “Securities Act”) and under the Securities Exchange Act of 1934
23 (the “Exchange Act”) (the “Class”).

1 interstate telephone communications and the facilities of the national securities
2 exchange.

3 **PARTIES**

4 8. Plaintiff, as set forth in the accompanying Certification, which is
5 incorporated by reference herein, purchased the securities of Xunlei at artificially
6 inflated prices during the Class Period and was damaged upon the revelation of
7 the alleged corrective disclosures.

8 9. Xunlei is a Cayman Islands corporation headquartered in Shenzhen,
9 PRC. During the Class Period, the Company's stock was traded on the NASDAQ
10 ("NASDAQ") under the symbol "XNET."

11 10. Defendant Sean Shenglong Zou ("Zou") served as the Company's
12 Chief Executive Officer ("CEO") and Chairman during the Class Period.

13 11. Defendant Tao Thomas Wu ("Wu") served as the Company's Chief
14 Financial Officer ("CFO") during the Class Period.

15 12. Defendants Zou and Wu are collectively referred to hereinafter as the
16 "Individual Defendants."

17 13. Defendant J.P. Morgan Securities LLC ("J.P. Morgan") was an
18 underwriter for Xunlei's June 2014 IPO. J.P. Morgan was allotted 3,683,103
19 ADSs of Xunlei for the IPO.

20 14. Defendant Citigroup Global Markets Inc. ("Citigroup") was an
21 underwriter for Xunlei's June 2014 IPO. Citigroup was allotted 3,266,147 ADSs
22 of Xunlei for the IPO.

23

1 15. Defendant Oppenheimer & Co. Inc. (“Oppenheimer”) was an
2 underwriter for Xunlei’s June 2014 IPO. Oppenheimer was allotted 365,750 ADSs
3 of Xunlei for the IPO.

4 16. Defendants J.P. Morgan, Citigroup, and Oppenheimer are
5 collectively referred to hereinafter as “Underwriter Defendants.”

6 17. Defendants Xunlei, Zou, Wu, J.P. Morgan, Citigroup, and
7 Oppenheimer are collectively referred to hereinafter as “Defendants.”

8 18. Each of the Individual Defendants:

9 (a) directly participated in the management of the Company;

10 (b) was directly involved in the day-to-day operations of the
11 Company at the highest levels;

12 (c) was privy to confidential proprietary information concerning the
13 Company and its business and operations;

14 (d) was involved in drafting, producing, reviewing and/or disseminating
15 the false and misleading statements and information alleged herein;

16 (e) was aware of or recklessly disregarded the fact that the false and
17 misleading statements were being issued concerning the Company; and

18 (f) approved or ratified these statements in violation of the federal
19 securities laws.

20 19. As officers, directors, and controlling persons of a publicly-held
21 company whose ADSs are and were registered with the SEC pursuant to the
22 Exchange Act, and was traded on NASDAQ and governed by the provisions of
23 the federal securities laws, the Individual Defendants each had a duty to

1 disseminate accurate and truthful information promptly with respect to the
2 Company's business prospects and operations, and to correct any previously-
3 issued statements that had become materially misleading or untrue to allow the
4 market price of the Company's publicly-traded stock to reflect truthful and
5 accurate information.

6 20. Xunlei is liable for the acts of the Individual Defendants and its
7 employees under the doctrine of respondeat superior and common law principles
8 of agency as all of the wrongful acts complained of herein were carried out within
9 the scope of their employment with authorization.

10 21. The scienter of the Individual Defendants and other employees and
11 agents of the Company is similarly imputed to Xunlei under respondeat superior
12 and agency principles.

13 **SUBSTANTIVE ALLEGATIONS**

14 **Background**

15 22. On May 23, 2014, Xunlei filed a registration statement on Form F-1
16 with the SEC in connection with the IPO. The registration statement was amended
17 for the final time when the Company filed an amended Form F-1/A with the SEC
18 on June 20, 2014 (collectively, the "Registration Statement").

19 23. The Registration Statement contained a preliminary prospectus. The
20 Final prospectus (the "Prospectus") was filed with the SEC on June 24, 2014.

21 24. On June 23, 2014, the SEC declared the Registration Statement
22 effective.

23

1 integrated. And we expect Xiaomi to be one of the first paying
2 customers ever expected to use Project Crystal to reduce their
bandwidth usage for MIUU system upgrades.

3 (emphasis added).

4 29. On the same conference call, Defendant Wu stated in relevant part:

5 No, Crystal has not contributed to reduction of bandwidth cost
6 of this quarter yet but you know you are absolutely correct to
7 point out that bandwidth cost is a predictor or revenue certainly
8 declined. Without giving a lot of details we are still in the early
9 stage of testing the tech and what we mentioned is that the
10 bandwidth we can generate is 9 or 10 times what we could
11 generate a few months ago. So we are hopeful that we can scale
12 number 1 and number 2 stabilize the system in the next uh near
13 future. Certainly not from a financial standpoint it has not
14 contributed to our bandwidth costs yet. And the final point is
15 that you are absolutely correct the implications of Crystal is
essentially two fold. As we reiterated on a call, not only can it
potentially help us reduce bandwidth costs [inaudible] itself but
at the end of the day you know should [inaudible] usage of
capacity for bandwidth is limited should excess bandwidth
savings if you will can be passed on to other users and we
believe for example that Xiaomi will be one of the first users
for Crystal but uh again this is still in the very early stage and
we look forward to updating the marketplace in a timely
manner should there be a material information and
developments.

16 30. On March 11, 2015, Xunlei issued the press release entitled, “Xunlei
17 Announces Unaudited Financial Results for the Fourth Quarter and the Fiscal
18 Year Ended December 31, 2014.” The press release contained guidance for the
19 first quarter of 2015 stating in relevant part:

20 *For the first quarter 2015, Xunlei estimates total revenues to*
21 *be between US\$37 million to US\$41 million, the midpoint of*
22 *the range representing a year over year decrease of 5% and a*
23 *quarter-over-quarter decline of 16%.*

(emphasis added)

1 31. On March 31, 2015, Xunlei issued the press release entitled, “Xunlei
2 Announces Strategic Divestment of Xunlei Kankan.” The press release discussed
3 Xunlei’s divestment of its video streaming division, Kankan, stating in relevant
4 part:

5 SHENZHEN, China, March 31, 2015 (GLOBE NEWSWIRE) -
6 - Xunlei Limited (“Xunlei” or the “Company”)
7 (Nasdaq:XNET), China’s leading provider of acceleration
8 products and services, today announced that it has entered into
9 a legally binding framework agreement with Beijing Nesound
International Media Corp., Ltd. (“Nesound”), an independent
third party, to sell the Company’s entire stake in its online
video streaming platform, Xunlei Kankan.

10 The Company intends to sell Xunlei Kankan for a consideration
11 of RMB130 million. Xunlei’s Board approved the transaction
12 after considering the benefits of the transaction to the Company
13 and its shareholders. ***The Company believes that the
divestment of Xunlei Kankan is consistent with Xunlei’s new
strategic focus on streamlining existing non-core and
unprofitable businesses so as to devote sufficient management
attention to execute strategies on mobility and Project Crystal.***
14 The completion of the transaction is subject to the signing of a
15 definitive purchase agreement and fulfilling closing conditions
16 contained therein, which may include the completion of a
17 specific research and development project, the transfer of
18 domain name and other assets and businesses of Xunlei
Kankan, and the application for the transfer of permits and
licenses required for Xunlei Kankan’s operations. If the
transaction fails to close due to the fault of either Xunlei or
Nesound, including the failure to meet closing conditions, the
responsible party shall be liable to pay an additional fee of
RMB52 million.

19 Mr. Sean Zou, Chairman and Chief Executive Officer of
20 Xunlei, stated: ***“I am pleased that the Board has unanimously
approved the sale of Kankan as part of our initiative to
streamline existing businesses and to focus on our continued
transition to mobile internet,*** which we expect will offer our
21 employees and our investors with exciting future prospects.”
22

23 “As I mentioned in our last earnings call, we are convinced that
it is necessary to respond to changing environment, technical

1 innovation and more diverse customer expectations with a bold
2 new beginning. *Xunlei will tap the growth potential created by
3 its transformation from a primarily PC-based company to a
4 mobile internet company, which we believe to be critical to
5 our long term growth.*” added Mr. Zou.

(emphasis added).

6 32. The statements contained in ¶¶ 27-31 were materially false and/or
7 misleading when made because Defendants failed to disclose or indicate the
8 material risk that Xunlei’s strategic focus on Project Crystal and its mobility
9 initiative would have a detrimental impact on the Company’s financial condition.

10 The Truth Emerges

11 33. After the market closed on May 20, 2015, the Company issued a
12 press release entitled, “Xunlei Announces Unaudited Financial Results for the
13 First Quarter Ended March 31, 2015.” The press release stated in relevant part:

14 **Total revenues were US\$30.2 million**, an 8.4% decrease from
15 the corresponding period of last year and a 14.9% decrease
16 from the previous quarter.

17 * * *

18 Mr. Sean Zou, Chairman and Chief Executive Officer of
19 Xunlei, commented on the results. “Our first quarter revenue
20 was within our guidance range as we continue to focus on our
21 key strategic imperative. *The ongoing transition to mobile
22 internet is a critical factor to our planned long-term growth.
23 We remain steadfast in our focus to deepen our existing
business cooperation with Xiaomi, expand our presence in the
mobile space, continue apace with Project Crystal and create
long term value for our shareholders.*”

Mr. Tom Wu, Chief Financial Officer of Xunlei, added, “The
pending divestiture of Xunlei Kankan is a key step for us to
resharpen our strategic focus and shift resources to drive future
growth, which we believe will help to improve our cash flow
and financial results.”

1 * * *

2 **Total Revenues**

3 *Total revenues were US\$30.2 million*, down 8.4% year-over-year and 14.9% sequentially.

4 * * *

5 **Strategic Divestment of Xunlei Kankan**

6 On March 31, 2015, the Company entered into a legally binding
7 framework agreement with Beijing Nesound International
8 Media Corp., Ltd. (“Nesound”), an independent third party, to
9 sell the Company’s entire stake in its online video streaming
10 platform, Xunlei Kankan, for a total consideration of RMB130
11 million. The Company received a deposit of RMB26 million in
12 April 2015. In May 2015, the Company signed definitive share
13 and asset transfer agreements with Nesound to effect such sale.
14 The transaction is currently scheduled to be completed by the
15 end of the second quarter of 2015, although the completion
16 remains subject to the fulfilling of certain closing conditions
17 specified in the signed agreements, which include the transfer
18 of domain names and other assets and businesses of Xunlei
19 Kankan and the application for the transfer of permits and
20 licenses required for Xunlei Kankan’s operations.

(emphasis added).

15 34. On this news, the Company’s stock fell \$1.69 per ADS or almost
16 15% the next day to close at \$9.71 per share on May 21, 2015.

17 35. As a result of defendants’ wrongful acts and omissions, and the
18 precipitous decline in the market value of the Company’s securities, Plaintiff and
19 other Class members have suffered significant losses and damages.

20 **PLAINTIFF’CLASS ACTION ALLEGATIONS**

21 36. Plaintiffs bring this action as a class action pursuant to Federal Rule
22 of Civil Procedure 23(a) and (b)(3) on behalf of a Class, consisting of all those
23 who purchased or otherwise acquired Xunlei securities during the Class Period

1 (the “Class”); and were damaged upon the revelation of the alleged corrective
2 disclosures. Excluded from the Class are Defendants herein, the officers and
3 directors of the Company, at all relevant times, members of their immediate
4 families and their legal representatives, heirs, successors or assigns and any entity
5 in which Defendants have or had a controlling interest.

6 37. The members of the Class are so numerous that joinder of all
7 members is impracticable. Throughout the Xunlei Class Period, securities of
8 Xunlei were actively traded on the NASDAQ. While the exact number of Class
9 members is unknown to Plaintiffs at this time and can only be ascertained through
10 appropriate discovery, Plaintiffs believe that there are hundreds or thousands of
11 members in the proposed Class. Record owners and other members of the Class
12 may be identified from records maintained by Xunlei or their transfer agents and
13 may be notified of the pendency of this action by mail, using the form of notice
14 similar to that customarily used in securities class actions.

15 38. Plaintiff’s claims are typical of the claims of the members of the
16 Class as all members of the Class are similarly affected by defendants’ wrongful
17 conduct in violation of federal law complained of herein.

18 39. Plaintiff will fairly and adequately protect the interests of the
19 members of the Class and have retained counsel competent and experienced in
20 class action and securities litigation.

21 40. Common questions of law and fact exist as to all members of the
22 Class and predominate over any questions solely affecting individual members of
23 the Class. Among the questions of law and fact common to the Class are:

- 1 • whether the federal securities laws were violated by Defendants’
2 acts as alleged herein;
- 3 • whether statements made by Defendants to the investing public
4 during the Class Period misrepresented material facts about the
5 business, operations and management of Xunlei;
- 6 • whether the Individual Defendants caused Xunlei to issue false
7 and misleading financial statements during the Class Period;
- 8 • whether Defendants acted knowingly or recklessly in issuing
9 false and misleading financial statements;
- 10 • whether the prices of Xunlei securities during the Class Period
11 were artificially inflated because of the Defendants’ conduct
12 complained of herein; and,
- 13 • whether the members of the Class have sustained damages and, if
14 so, what is the proper measure of damages.

15 41. A class action is superior to all other available methods for the fair
16 and efficient adjudication of this controversy since joinder of all members is
17 impracticable. Furthermore, as the damages suffered by individual Class members
18 may be relatively small, the expense and burden of individual litigation make it
19 impossible for members of the Class to individually redress the wrongs done to
20 them. There will be no difficulty in the management of this action as a class
21 action.

22 42. Plaintiff will rely, in part, upon the presumption of reliance
23 established by the fraud-on-the-market doctrine in that:

- Defendants made public misrepresentations or failed to disclose
material facts during the Class Period;
- the omissions and misrepresentations were material;
- Xunlei securities are traded in efficient markets;

- 1 • the Company's shares were liquid and traded with moderate to heavy volume during the Class Period;
- 2 • the Company traded on the NASDAQ, and was covered by
- 3 multiple analysts;
- 4 • the misrepresentations and omissions alleged would tend to
- 5 induce a reasonable investor to misjudge the value of the
- 6 Company's securities; and
- 7 • Plaintiff and members of the Class purchased and/or sold Xunlei
- 8 securities between the time the Defendants failed to disclose or
- 9 misrepresented material facts and the time the true facts were
- 10 disclosed, without knowledge of the omitted or misrepresented
- 11 facts.

12 43. Based upon the foregoing, Plaintiff and the members of the Class are

13 entitled to a presumption of reliance upon the integrity of the market.

14 44. Alternatively, Plaintiffs and the members of the Class are entitled to

15 the presumption of reliance established by the Supreme Court in *Affiliated Ute*

16 *Citizens of the State of Utah v. United States*, 406 U.S. 128, 92 S. Ct. 2430 (1972),

17 as Defendants omitted material information in their Class Period statements in

18 violation of a duty to disclose such information, as detailed above.

19 COUNT I

20 (Against All Defendants for Violations of Section 10(b) of

21 the Exchange Act and Rule 10b-5 Promulgated Thereunder)

22 45. Plaintiff repeats and realleges each and every allegation contained

23 above as if fully set forth herein.

46. This Count is asserted against defendants and is based upon Section

10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated

thereunder by the SEC.

1 47. During the Class Period, defendants engaged in a plan, scheme,
2 conspiracy and course of conduct, pursuant to which they knowingly or recklessly
3 engaged in acts, transactions, practices and courses of business which operated as
4 a fraud and deceit upon Plaintiff and the other members of the Class; made
5 various untrue statements of material facts and omitted to state material facts
6 necessary in order to make the statements made, in light of the circumstances
7 under which they were made, not misleading; and employed devices, schemes and
8 artifices to defraud in connection with the purchase and sale of securities. Such
9 scheme was intended to, and, throughout the Class Period, did: (i) deceive the
10 investing public, including Plaintiff and other Class members, as alleged herein;
11 (ii) artificially inflate and maintain the market price of Xunlei securities; and (iii)
12 cause Plaintiff and other members of the Class to purchase or otherwise acquire
13 Xunlei securities and options at artificially inflated prices. In furtherance of this
14 unlawful scheme, plan and course of conduct, defendants, and each of them, took
15 the actions set forth herein.

16 48. Pursuant to the above plan, scheme, conspiracy and course of
17 conduct, each of the defendants participated directly or indirectly in the
18 preparation and/or issuance of the quarterly and annual reports, SEC filings, press
19 releases and other statements and documents described above, including
20 statements made to securities analysts and the media that were designed to
21 influence the market for Xunlei securities. Such reports, filings, releases and
22 statements were materially false and misleading in that they failed to disclose
23

1 material adverse information and misrepresented the truth about Xunlei's finances
2 and business prospects.

3 49. By virtue of their positions at Xunlei, defendants had actual
4 knowledge of the materially false and misleading statements and material
5 omissions alleged herein and intended thereby to deceive Plaintiff and the other
6 members of the Class, or, in the alternative, defendants acted with reckless
7 disregard for the truth in that they failed or refused to ascertain and disclose such
8 facts as would reveal the materially false and misleading nature of the statements
9 made, although such facts were readily available to defendants. Said acts and
10 omissions of defendants were committed willfully or with reckless disregard for
11 the truth. In addition, each defendant knew or recklessly disregarded that material
12 facts were being misrepresented or omitted as described above.

13 50. Defendants were personally motivated to make false statements and
14 omit material information necessary to make the statements not misleading in
15 order to personally benefit from the sale of Xunlei securities from their personal
16 portfolios.

17 51. Information showing that defendants acted knowingly or with
18 reckless disregard for the truth is peculiarly within defendants' knowledge and
19 control. As the senior managers and/or directors of Xunlei, the Individual
20 Defendants had knowledge of the details of Xunlei's internal affairs.

21 52. The Individual Defendants are liable both directly and indirectly for
22 the wrongs complained of herein. Because of their positions of control and
23 authority, the Individual Defendants were able to and did, directly or indirectly,

1 control the content of the statements of Xunlei. As officers and/or directors of a
2 publicly-held company, the Individual Defendants had a duty to disseminate
3 timely, accurate, and truthful information with respect to Xunlei's businesses,
4 operations, future financial condition and future prospects. As a result of the
5 dissemination of the aforementioned false and misleading reports, releases and
6 public statements, the market price of Xunlei securities was artificially inflated
7 throughout the Class Period. In ignorance of the adverse facts concerning
8 Xunlei's business and financial condition which were concealed by defendants,
9 Plaintiff and the other members of the Class purchased or otherwise acquired
10 Xunlei securities at artificially inflated prices and relied upon the price of the
11 securities, the integrity of the market for the securities and/or upon statements
12 disseminated by defendants, and were damaged thereby.

13 53. During the Class Period, Xunlei securities were traded on an active
14 and efficient market. Plaintiff and the other members of the Class, relying on the
15 materially false and misleading statements described herein, which the defendants
16 made, issued or caused to be disseminated, or relying upon the integrity of the
17 market, purchased or otherwise acquired shares of Xunlei securities at prices
18 artificially inflated by defendants' wrongful conduct. Had Plaintiff and the other
19 members of the Class known the truth, they would not have purchased or
20 otherwise acquired said securities, or would not have purchased or otherwise
21 acquired them at the inflated prices that were paid. At the time of the purchases
22 and/or acquisitions by Plaintiff and the Class, the true value of Xunlei securities
23 was substantially lower than the prices paid by Plaintiff and the other members of

1 the Class. The market price of Xunlei securities declined sharply upon public
2 disclosure of the facts alleged herein to the injury of Plaintiff and Class members.

3 54. By reason of the conduct alleged herein, defendants knowingly or
4 recklessly, directly or indirectly, have violated Section 10(b) of the Exchange Act
5 and Rule 10b-5 promulgated thereunder.

6 55. As a direct and proximate result of defendants' wrongful conduct,
7 Plaintiff and the other members of the Class suffered damages in connection with
8 their respective purchases, acquisitions and sales of the Company's securities
9 during the Class Period, upon the disclosure that the Company had been
10 disseminating misrepresented financial statements to the investing public.

11
12 **COUNT II**

13 **(Against the Individual Defendants for
Violations of Section 20(a) of the Exchange Act)**

14 56. Plaintiff repeats and realleges each and every allegation contained in
15 the foregoing paragraphs as if fully set forth herein.

16 57. During the Class Period, the Individual Defendants participated in the
17 operation and management of Xunlei, and conducted and participated, directly and
18 indirectly, in the conduct of Xunlei's business affairs. Because of their senior
19 positions, they knew the adverse non-public information about Xunlei's
20 misstatement of income and expenses and false financial statements.

21 58. As officers and/or directors of a publicly owned company, the
22 Individual Defendants had a duty to disseminate accurate and truthful information
23 with respect to Xunlei's financial condition and results of operations, and to

1 correct promptly any public statements issued by Xunlei which had become
2 materially false or misleading.

3 59. Because of their positions of control and authority as senior officers,
4 the Individual Defendants were able to, and did, control the contents of the
5 various reports, press releases and public filings which Xunlei disseminated in the
6 marketplace during the Class Period concerning Xunlei's results of operations.
7 Throughout the Class Period, the Individual Defendants exercised their power and
8 authority to cause Xunlei to engage in the wrongful acts complained of herein.
9 The Individual Defendants therefore, were "controlling persons" of Xunlei within
10 the meaning of Section 20(a) of the Exchange Act. In this capacity, they
11 participated in the unlawful conduct alleged which artificially inflated the market
12 price of Xunlei securities.

13 60. Each of the Individual Defendants, therefore, acted as a controlling
14 person of Xunlei. By reason of their senior management positions and/or being
15 directors of Xunlei, each of the Individual Defendants had the power to direct the
16 actions of, and exercised the same to cause, Xunlei to engage in the unlawful acts
17 and conduct complained of herein. Each of the Individual Defendants exercised
18 control over the general operations of Xunlei and possessed the power to control
19 the specific activities which comprise the primary violations about which Plaintiff
20 and the other members of the Class complain.

21 61. By reason of the above conduct, the Individual Defendants are liable
22 pursuant to Section 20(a) of the Exchange Act for the violations committed by
23 Xunlei.

1 **PRAYER FOR RELIEF**

2 **WHEREFORE**, Plaintiff demands judgment against Defendants as
3 follows:

4 A. Determining that the instant action may be maintained as a class
5 action under Rule 23 of the Federal Rules of Civil Procedure, and certifying
6 Plaintiff as the Class representative;

7 B. Requiring Defendants to pay damages sustained by Plaintiff and the
8 Class by reason of the acts and transactions alleged herein;

9 C. Awarding Plaintiff and the other members of the Class prejudgment
10 and post-judgment interest, as well as their reasonable attorneys' fees, expert fees
11 and other costs; and

12 D. Awarding such other and further relief as this Court may deem just
13 and proper.

14 **DEMAND FOR TRIAL BY JURY**

15 Plaintiff hereby demands a trial by jury.

16 Dated: June 15, 2015

17 Respectfully submitted,

18 **POMERANTZ LLP**

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