

3. Kimson Chemical, Inc. ("Kimson") is a plaintiff in the above the above-captioned securities class action (the "Action"). I am the owner of Kimson and I am its Chief Executive Officer. Kimson has been appointed by this Court as one of three Lead Plaintiffs in this Action, along with Michael Bergenholtz ("Bergenholtz") and Plaintiff Teamsters Local 710 Pension Fund ("Teamsters 710").

4. I respectfully submit this affidavit in support of: (1) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; (2) Plaintiffs' Counsel's Application for Attorneys' Fees and Litigation Expenses; and (3) Awards to each of the three Co-Lead Plaintiffs for service awards of \$5,000.

4. I purchased American Depositary Shares ("ADSs") of Luckin Coffee, Inc. ("Luckin") pursuant or traceable to the registration statement in connection with Luckin's public offering, and thus suffered losses as a result of my transactions in Luckin ADSs.

5. Since the start of this Action and to date, I have been committed to assisting Plaintiffs' Counsel and serving the best interests of the Settlement Class.

6. When I engaged my counsel, Shapiro Haber & Urmy LLP and Schubert Jonkheer & Kolbe LLP, to bring and represent me in this class action, I signed an engagement letter with those firms in which I made several commitments with respect to my anticipated role as a named plaintiff and class representative. I agreed "to cooperate fully with the Firms and to:

1. provide all information known by or available to you which may aid the Firms in representing you in the Action;
2. take all steps reasonable and necessary to preserve documents, things or electronically stored information in your possession, custody or control concerning the Action;
3. attend, when necessary, depositions, a trial or other legal proceedings.
4. take all steps reasonable and necessary to assist the Firms and to carry out your duties as a class representative to fairly and adequately protect the interests of the Class.”

7. I reviewed and authorized the filing of the original complaint filed by me in this Action.

8. I reviewed and authorized the filing of the Consolidated Complaint filed in this Action.

9. Per my commitment above, I stood ready to attend depositions or trial but this Action settled before any depositions or trial occurred.

10. I believe the \$7,000,000 settlement is an excellent result for the Settlement Class of Luckin Noteholders. The Settlement could not have been accomplished without Plaintiffs' Counsel's relentless prosecution of the Action. Therefore, I believe the Settlement represents a fair, reasonable, and adequate recovery on behalf of the Settlement Class of Luckin Noteholders, and that its approval is in the best interests of each Settlement Class Member.

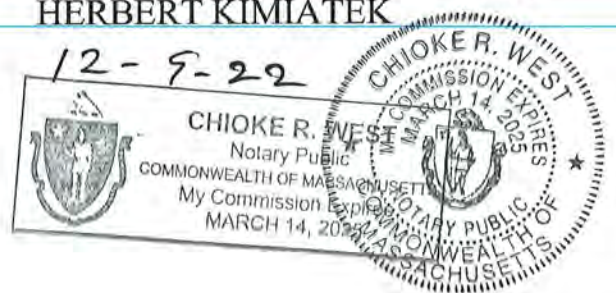
8. Furthermore, I approve and support Plaintiffs' Counsel's request for an award of attorneys' fees of one-third of the Settlement Fund and payment of litigation expenses, with interest on both amounts. Given the high-quality representation, responsiveness, and diligence in prosecuting this Action, as well as the resulting recovery of \$7,000,000 for the Settlement Class in the face of the risk of no recovery at all, I believe Plaintiffs Counsel's requested award of attorneys' fees and expenses is both fair and just.

9. In accordance with my duties as a lead plaintiff, I have not received, nor have I been promised or offered, any financial incentive or compensation for serving as a plaintiff in the Action. Nevertheless, I understand that courts may authorize an award to lead plaintiff class representatives. While I know that the grant of such an award is entirely in the discretion of the Court, it is also my understanding that the Settlement Class has been given notice of the request by the three Co-Lead Plaintiffs to seek service awards of \$5000 each. I therefore respectfully request a service award of \$5,000 in connection with my role as a Co-Lead Plaintiff in the Action.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 9th day of December 2022.

Herb Kimiatek 12-9-22
HERBERT KIMIATEK



NOTARY ACKNOWLEDGMENT

COMMONWEALTH OF MASSACHUSETTS)

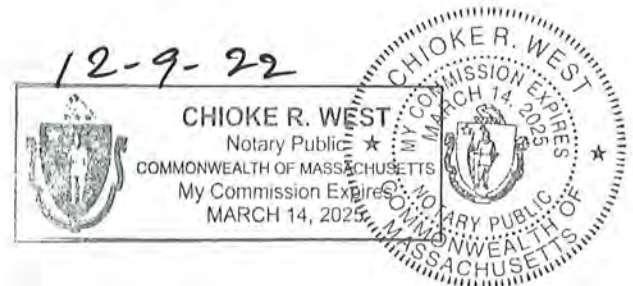
) ss:

COUNTY OF MIDDLESEX)

This Affidavit was acknowledged before me this 9th day of December 2022, by Herbert Kimiatek, who, being first duly sworn on oath according to law, deposes and says that he has read the foregoing Affidavit subscribed by him, and that the matters stated herein are true to the best of his information, knowledge, and belief.

Notary Public
CHIOKE R. WEST

My commission expires: 3-14-25



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: 14

Line Spacing: Double

2. The total number of words in the affidavit, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 988 words.

DATED: December 9, 2022

/s/ Edward F. Haber

Edward F. Haber

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