

Exhibit 19

**THE AMERICAN ARBITRATION ASSOCIATION
INTERNATIONAL CENTRE FOR DISPUTE RESOLUTION**

Joe Fasano; Altimeo Optimum Fund; Altimeo
Asset Management; Individually and On Behalf
of All Others Similarly Situated,

Claimants,

v.

Guoqing Li; Peggy Yu Yu; Dangdang Holding
Company, Ltd.; E-Commerce China Dangdang
Inc.; Kewen Holding Co. Ltd.; Science &
Culture Ltd.; First Profit Management, Ltd.;
Danqian Yao; Lijun Chen; and Min Kan;

Respondents.

Case No. 01-22-0003-8285

**DECLARATION OF JOE FASANO IN SUPPORT OF
CLAIMANTS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND MOTION FOR ATTORNEYS' FEES, EXPENSES, AND
COMPENSATORY AWARDS FOR CLAIMANTS**

I, Joe Fasano, make this declaration and affirm under the penalties of perjury as follows:

1. I am one of the lead Claimants in this matter. I respectfully make this declaration in support of final approval of the proposed settlement of this matter for \$21 million, approval of the proposed Plan of Allocation for distributing the proceeds of the Settlement, and approval of Lead Counsel's request for attorneys' fees and expenses. I also respectfully submit this declaration in support of my request for an award, consistent with the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(4), in recognition of the time that I dedicated to the litigation on behalf of the proposed Settlement Class. I have personal knowledge of the statements herein and, if called as a witness, could competently testify about them.

2. I held over 2,950 ADS of E-Commerce China Dangdang, Inc. ("Dangdang") during

the proposed class period of March 9 through September 20, 2016, which were cashed out pursuant to the September 20, 2016 closing of the going-private Merger at issue in this case. I followed news about and was aware of the Merger.

3. After the Merger closed, I engaged counsel in October 2016 to pursue potential claims. I was first sent an engagement agreement on October 6, 2016. I executed the agreement and sent it back approximately two weeks later.

4. I was appointed by the District Court as Co-Lead Plaintiff on behalf of the Class for this action on March 8, 2017, pursuant to Section 21D(a)(3)(B)(iii) of the Private Securities Litigation Reform Act of 1995 (“PSLRA”). And I have served as a class representative since then.

5. As a Co-Lead Plaintiff and a lead Claimant in this arbitration, I have reviewed and monitored the progress of this controversy and the activities of Lead Counsel, Sadis & Goldberg, LLP (“Sadis”). I have and I will continue to regularly communicate with Sadis about various aspects of this litigation, including pleadings, motion practice, discovery, mediation, and other case development. I previously submitted a declaration in support of Class Certification.

6. I have received and reviewed key documents in this case, including the Demand, the Answer, discovery demands, the motion for clause construction, the motion for class certification, decisions from the Tribunal, and prior key filings in *Fasano et al. v. Li et al.*, No. 1:16-cv-08759-KPF (SDNY) (the “Federal Action”)—including Respondents’ three motions to dismiss, Claimants’ motion to compel arbitration, and the appeals to the Second Circuit.

7. In addition, I have diligently participated in discovery, searching for and gathering documents for production in response to Respondents’ January 3, 2025 document requests, Respondents’ February 3, 2025 motion to compel, and the Tribunal’s decisions in the Redfern Schedule on March 31, 2025.

8. I worked with Lead Counsel to prepare and file a declaration in support Claimants' Motion for Class Certification. I worked with Lead Counsel to prepare to testify at the Class Certification hearing, which was scheduled before the parties finally agreed to the Settlement.

9. I initially reached out to Sadis in October of 2016, the month after the Merger closed. I worked with Lead Counsel to gather information and prepare the original Complaint in the Federal Action and seek appointment as Co-Lead Plaintiff. I requested and received regular updates as to the progress of the litigation, both in the Federal Action and this Arbitration, and advised on issues of strategy and approach with Lead Counsel.

10. I consulted with Lead Counsel before and during settlement discussions, articulated by settlement authority, and evaluated and approved the Settlement and proposed plan of allocation to ensure that it is equitable to the Settlement Class, as well as Claimants' motion for preliminary approval of the Settlement, our responses to the Tribunal's questions following-up on that motion, and the accompanying motions for final approval of the Settlement and for attorneys' fees, litigation expenses, and Claimants' compensatory awards.

11. All the efforts described above provided a benefit to the Settlement Class by supporting Lead Counsel's efforts in litigating this case since November of 2016 and reaching the Settlement that is very favorable for the Class.

12. I support the proposed Settlement for \$21 million in cash to the Settlement Fund. I believe this Settlement is fair and reasonable result achieved by Claimants and Lead Counsel in the light of the benefits it provides to the Settlement Class and the risks and uncertainties of continued litigation.

13. I understand that as a class representative I can seek an award of my costs and expenses in connection with the representation of the Class, including compensation for time spent

working on behalf of the Settlement Class, under the Supplementary Rules and the PSLRA. For this reason, in connection with Lead Counsel's request for expenses, I am seeking reimbursement for the time I dedicated in the prosecution of the Entire Action, during which I could have otherwise worked.

14. In my capacity as Co-Lead Claimant, I spent a significant amount of time on the Entire Action on the efforts described above over the course of more than 9 years, since November 2016, when I analyzed whether to file the Original Complaint in the Federal Action. I estimate that I spent 441 hours performing the tasks above to achieve the greatest benefit to the Settlement Class. Given my participation in this action, I respectfully request reimbursement of \$70,000 for these efforts that led to the Settlement.

15. Based on my decades of experience as a skilled, union deck-builder and foreman, I believe that my time is worth more than \$160 an hour. I submit that the \$70,000 is, therefore, fair compensation for my time and opportunity cost.

16. I support the requested award of attorneys' fees in the amount of 33.33% of the Settlement Amount. I believe this amount is fair and reasonable under the circumstances of this case in the light of the effort required by Lead Counsel to pursue the case to date, the risks and challenges in the litigation, as well as the recovery obtained for the Settlement Class. I understand that Lead Counsel will also devote additional time in the future to administering the Settlement.

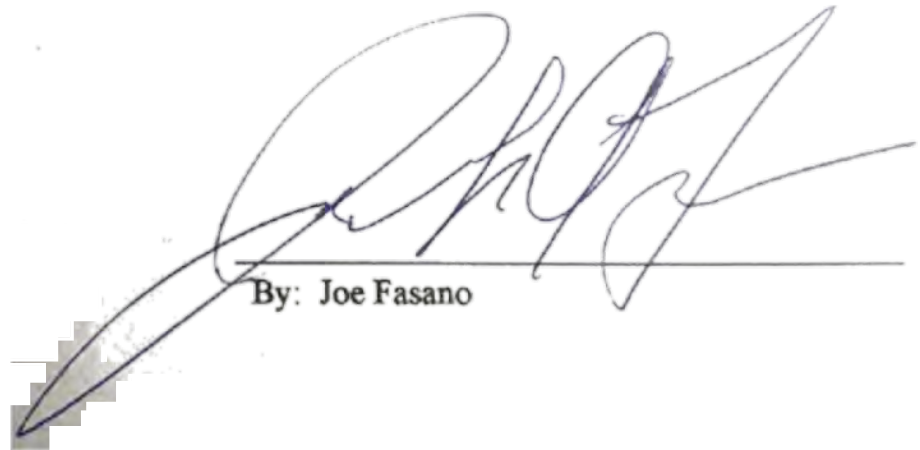
17. I further believe that the litigation expenses requested of approximately \$1.38 million are reasonable and represent the costs and expenses that necessary for the successful prosecution and resolution of the Entire Action. Based on the foregoing, I fully support Lead Counsel's motion for attorneys' fees and payment of litigation expenses.

18. In sum, I was closely involved throughout the prosecution and settlement of the

claims in this Matter and the Federal Action and respectfully requests that the Tribunal approve the Settlement as fair and reasonable, and adequate; grant a compensatory award of \$70,000 to me in light of the time and effort I expended in pursuing the Entire Action; and approve the attorneys' fee request of 33.33% of the Settlement Amount and full reimbursement of litigation expenses.

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

Dated: New York
July 6, 2026



By: Joe Fasano