UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-2989-MDL-ALTONAGA/Torres

IN RE:

JANUARY 2021 SHORT SQUEEZE TRADING LITIGATION
_____/

This Document Relates to All Claims Included
In the Other Broker Tranche

DECLARATION OF JACK E. PACE III
IN SUPPORT OF APEX MOTION TO DISMISS

I, Jack E. Pace III, hereby declare as follows:

1. I am an attorney duly authorized to practice law in the State of New York and am authorized to appear in the above-captioned litigation pursuant to this Court's Pretrial Order #1 (Doc. No. 46) having filed a Certificate of Understanding on April 12, 2021 (Doc. No. 81). I am a Partner in the law firm of White & Case LLP, counsel for Defendant Apex Clearing Corporation ("Apex"). I submit this Declaration in support of Apex's Motion to Dismiss Complaint Pursuant to Rules 12(b)(1) and 12(b)(6). I am familiar with the facts set forth herein, based on my personal knowledge of the material referenced herein.

2. Attached hereto as Exhibit 8 is a true and correct copy of the an article dated March 4, 2021, from financialplanning.com describing an interview with Tricia Rothschild, which Plaintiffs reference in Paragraph 84 of the Amended Complaint. Highlighting has been added to indicate the relevant language referred to in the Amended Complaint.

3. Attached hereto as Exhibit 9 is a true and correct copy of *French v. Bache Halsey Stuart, Inc.*, CFTC No. R 76–17, ¶20,444 (June 23, 1997) (VitalLaw).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed in New York, New York on November 19, 2021.

/s/ *Jack E. Pace III*
Jack E. Pace III