UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-2989-MDL-ALTONAGA

In re:

JANUARY 2021 SHORTSQUEEZE
TRADING LITIGATION

_____/

This Document Relates to All Actions

PLAINTIFF DANILUK'S STATEMENT ON LEADERSHIP OF THIS MDL

Counsel for Plaintiff Daniluk participated in conferences regarding the Plaintiff leadership of this MDL and has reviewed correspondence regarding two different proposals for lead counsel. Plaintiff Daniluk recommends Jeffrey A. Klafter, Esq. as an interim co-lead counsel for this MDL with principal responsibility for the Robinhood tranche. Mr. Klafter has the experience and qualifications to make an impact as lead counsel in this case. Counsel for Daniluk has known and worked with Mr. Klafter professionally for over 30 years, including litigating a complex securities class action almost to the start of trial – a case that then settled with a recovery of substantial sums for the class. Since then, Mr. Klafter has worked in and been a leader in a wide variety of intensely litigated class and complex litigation.

Counsel for Daniluk has been representing Plaintiffs in class-action cases nationwide for over 30 years. *See* Exhibit A. We have successfully tried class cases to verdict in favor of plaintiffs and served in leadership in cases settled for $100 million and more. *Id.* We have stepped aside, as have other extremely distinguished and experienced counsel, in favor of Mr. Klafter because he represents the best opportunity for the members of the class to have their best cases presented to this Court.

While the slate presented by Natalia Salas, Esq., includes able attorneys, Ms. Salas lacks the experience and qualifications to be a lead in this MDL. To my knowledge, Ms. Salas has never been appointed to a leadership position in a class action or, more importantly, participated in a class action case from start to finish – experience that we believe to be of critical importance to provide effective representation of the class. The counsel suggested for leadership of the antitrust tranche has little experience in that field compared to Mr. Saveri, and the experience of the third member of their slate appears to be primarily in opposing class certification, rather than running a case to obtain class certification.

In conclusion, Plaintiff Daniluk recommends that the Court place this MDL, in part, in the highly qualified leadership of Mr. Klafter.

Dated: April 26, 2021

GREEN & NOBLIN, P.C.

By: /s/ Robert S. Green
Robert S. Green

James Robert Noblin
Evan M. Sumer
GREEN & NOBLIN, P.C.
2200 Larkspur Landing Circle, Suite 101
Larkspur, CA 94939
Telephone: (415) 477-6700
Facsimile: (415) 477-6710
Email: gnecf@classcounsel.com

Charles D. Marshall
MARSHALL LAW FIRM
2121 N. California Blvd., Suite 290
Walnut Creek, CA 94596
Telephone: (925) 575-7105
Facsimile: (9250 575-7105
Email: cdm@marshall-law-firm.com

Attorneys for Plaintiff,
JOSEPH DANILUK, on behalf of himself and all others similarly situated