

**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 ACTIONS.**

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**DECLARATION OF DENNIS S. ELLIS IN SUPPORT OF APPLICATION OF DENNIS  
S. ELLIS OF BROWNE GEORGE ROSS O'BRIEN ANNAGUEY & ELLIS LLP TO BE  
APPOINTED AS CO-LEAD INTERIM CLASS COUNSEL**

I, Dennis S. Ellis, declare as follows:

1. I am an attorney at law, duly admitted to practice in all courts for the State of California, and practicing before this Court in this matter consistent with Dkt. No. 46. I am a partner with Browne George Ross O'Brien Annaguey & Ellis LLP ("BGR"), counsel of record for Robert Days in *Days v. Robinhood Markets, Inc.*, No. 1:21-cv-21310-CMA. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could and would competently testify thereto.

2. I am a name partner with BGR, intimately involved in the management of the firm, and thus have extensive knowledge of the firm's recognitions, qualifications, practices, and finances. BGR is a sophisticated litigation boutique with approximately 50 attorneys that regularly represents clients in complex litigation, ranging from Fortune 500 companies to small businesses to celebrities to consumers. True and correct copies of portions of BGR's website providing background information concerning BGR are attached hereto as "**Exhibit A.**"

3. In recognition of its sophisticated practice and track record for achieving excellent results for clients, BGR and its lawyers are regularly recognized and profiled by various

publications. True and correct copies of recognitions earned by BGR, and profiles of the firm and its lawyers involved in this case, are attached hereto as “**Exhibit B.**”

4. I have enjoyed a sophisticated litigation practice for over 25 years. Prior to joining BGR, I practiced at Paul Hastings LLP for more than 24 years, where I was the Global Chair for Complex Litigation and Arbitration. A true and correct copy of my bio, outlining many of my noteworthy representations and experience, is attached hereto as “**Exhibit C.**”

5. Three of my partners at BGR are currently prepared to assist me in litigating this case. Katherine F. Murray and I practiced together at Paul Hastings LLP for nearly 20 years prior to joining BGR, having been counsel of record together in at least 20 class actions, and Carl Alan Roth practiced for more than 20 years at Skadden, Arps, Slate, Meagher & Flom LLP. Together they bring a wealth of class action experience at the highest level to the BGR team. True and correct copies of Ms. Murray’s and Mr. Roth’s bios are attached hereto as “**Exhibit D**” and “**Exhibit E**”, respectively.

6. My partner Matthew L. Venezia is a millennial lawyer, and one of the newest additions to BGR’s partner ranks. Mr. Venezia has taken a lead role in this case from its inception, taking responsibility for developing our complaint, and much of the day-to-day management of the matter, with my ultimate oversight. Mr. Venezia has a significant record of going head-to-head with some of the country’s largest firms, and winning, particularly for a lawyer of his age. A true and correct copy of Mr. Venezia’s bio is attached hereto as “**Exhibit F.**”

7. In addition to the BGR partners discussed above, BGR employs a wealth of well-qualified associates, from diverse backgrounds, that are available to support its partners in litigating this matter.

8. I am well-acquainted from my more than 25 years of experience litigating complex class actions with the costs in prosecuting such a case. And, I am also well-acquainted with BGR's financials. BGR is prepared to put the significant resources behind this case necessary to provide the best representation to the putative classes. I believe our commitment is evidenced by our staffing of this case.

9. My firm, along with The Ferraro Law Firm and Hach Rose Schirripa & Cheverie, LLP, have conducted extensive outreach to the other firms representing clients in this MDL to discuss the proposed leadership structure in an attempt to seek agreement and private ordering, consistent with the Court's prior orders. During the course of these conversations, we have been informed that numerous firms support the proposed leadership slate including myself, Ms. Salas, and Mr. Schirripa. Ms. Salas's office prepared a document that I understand includes the results of my firm's conversations, the conversations of Hach Rose Schirripa & Cheverie, LLP, and their own conversations, memorializing the firms that have gone on the record supporting this proposed leadership slate. A true and correct copy of that document is attached hereto as **"Exhibit G."**

Executed this 26th day of April 2021, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Dennis S. Ellis

Dennis S. Ellis