UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

In re:

JANUARY 2021 SHORT SQUEEZE TRADING LITIGATION

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This Document Relates to All Actions

JEFFREY A. KLAFTER'S WRITTEN DISCLOSURES IN FURTHER SUPPORT OF HIS APPLICATION FOR APPOINTMENT AS AN INTERIM LEAD COUNSEL

Pursuant to the Court's May 5, 2021 Order (ECF No. 286) requiring each applicant for a leadership position in the MDL to provide written responses to certain questions, Jeffrey A. Klafter ("Applicant") hereby responds as follows:

1. **Do you represent any present parties or claimants in this litigation whom you have represented in any other capacity or in any other court (either currently or within the past 3 years)? If so, please describe.**

   The only parties or claimants Applicant presently represents in this litigation are Plaintiffs Patryk Krasowski and Nick Parker. Neither Applicant nor his Firm currently represent either individual in any other capacity or in any other court nor has Applicant or his firm ever represented either individual.

2. **Do you have any financial interest or financial relationship, including but not limited to as an investor, officer, director, employee, or contractor, in or with any party or client/claimant involved in this MDL (other than a written retainer or engagement for a client in these consolidated actions)? If so, please describe.**

   Neither Applicant nor his Firm have any such financial interest or financial relationship.

3. **Do you have any financial interest (direct or indirect) in any Short Squeeze claims or lawsuits filed or registered by any other counsel in this MDL, other than the co-counsel relationships disclosed in the case chart (*see* [ECF No. 200-1])? If so, please describe.**

   Neither Applicant nor his Firm have any such financial interest.

4. **Do you have any personal relationship (including but not limited to familial or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL? If so, please describe.**

   Neither Applicant nor his Firm have any such personal relationship.

5. **Do you or your firm have any financing that it contingent upon this litigation?**

   Neither Applicant nor his Firm have obtained or intend to obtain any financing that is contingent upon this litigation.

6. **The applicant shall disclose any other relationship or fact that he or she believes, if known, would be material to the Court with respect to either an actual conflict of interest or the appearance of a conflict of interest that the applicant has not already disclosed to the Court.**

   Applicant does not have any relationship, and is not aware of any fact, that would constitute an actual conflict of interest or the appearance of a conflict of interest concerning this MDL.

Dated: May 11, 2021

Respectfully submitted,

KLAFTER LESSER LLP

/s/Jeffrey A. Klafter
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record by the CM/ECF system today.

Dated: May 11, 2021 /s/Jeffrey A. Klafter