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.
__________________________________/

WRITTEN DISCLOSURES OF LEAD COUNSEL APPLICANT DENNIS S. ELLIS PURSUANT TO DKT. NO. 286

Browne George Ross O'Brien Annaguey & Ellis LLP ("BGR"), by and through its partner Dennis S. Ellis, counsel for Robert Days in *Days v. Robinhood Markets, Inc. et al.*, Case No. 1:21-cv-21310-CMA, and applicant for an interim lead counsel position in this MDL, hereby makes the following written disclosures pursuant to this Court's Order of May 5, 2021 (Dkt. No. 286).

WRITTEN DISCLOSURES

- 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.

Response: No.

- 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 agreement for a client in these consolidated actions)? If so, please describe.

Response: No.

- 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.

Response: No.

- 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.

Response: No, setting aside Mr. Ellis's partnership with his co-counsel at BGR.

- Do you or your firm have any financing that is contingent upon this litigation? If yes, the following questions shall be answered:
    - Does the litigation funder have any control (direct or indirect, actual or apparent or implied) over the decision to file or the content of any motions or briefs, or any input into the decision to accept a settlement offer?
    - Does the financing (1) create any conflict of interest for counsel, (2) undermine counsel's obligation of vigorous advocacy, (3) affect counsel's independent judgment, (4) give to the lender any control over litigation strategy or settlement decisions (as to either the common benefit work done by counsel or work for individual retained clients), or (5) affect party control of settlement?

Response: No.

- 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.

Response: None.

Dated: May 14, 2021

/s/ Dennis S. Ellis
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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, a true and correct copy of the foregoing document was served on all counsel of record by the CM/ECF system.

Date: May 14, 2021

/s/Matthew L. Venezia
Matthew L. Venezia