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 GABRIEL A. ASSAAD,
APPLICANT FOR PLAINTIFFS' LEADERSHIP

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.

   Response: No

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

   Response: No

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.

   Response: No

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 inthis MDL? If so, please describe.

   Response: No

5. Do you or your firm have any financing that is contingent upon this litigation? If yes, the following questions shall be answered:

5.1. 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 motion or briefs, or any input into the decision to accept a settlement offer?

5.2. 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 controlof settlement?

Response: No

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.

Response: None

Dated May 10, 2021.

Respectfully submitted,

By: */s/ Gabriel A. Assaad*

Gabriel A. Assaad
Texas Bar No. 24076189
gassaad@mcdonaldworley.com
McDonald Worley, PC
1770 St. James St., Suite 100
Houston, TX 77056
(713) 523-5500 – telephone
(713) 523-5501 – facsimile

APPLICANT FOR PLAINTIFFS' LEADERSHIP

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Gabriel A. Assaad