UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

In re: JANUARY 2021 SHORT SQUEEZE TRADING LITIGATION

[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), the lead plaintiff has the sole authority to bring claims under the federal securities laws;

WHEREAS, pursuant to the PSLRA, 15 U.S.C. § 78u-4(a)(3)(A)(i), on May 28, 2021 a notice was issued to potential class members informing them of the action and their right to move to serve as lead plaintiff within 60 days of the date of the issuance of said notice;

WHEREAS, on July 27, 2021, Movant Blue Laine-Beveridge ("Movant"), moved the Court to: (1) be appointed as Lead Plaintiff; and (2) approve Movant's selection of The Rosen Law Firm, P.A. ("Rosen Law") as Lead Counsel;

WHEREAS, the PSLRA, provides, *inter alia*, that the most-adequate plaintiff to serve as lead plaintiff is the movant that has either filed a complaint or has made a motion in response to a notice and has the largest financial interest in the relief sought by the Class and satisfied the requirement of Fed. R. Civ. P. 23; and

WHEREAS, the Court finding that Movant has the largest financial interest in this action and prima facie satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23. *See* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I);

IT IS HEREBY ORDERED THAT:

APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL

1. Pursuant to Section 21D(a)(3)(B) of the Exchange Act, 15 U.S.C. §78u-(a)(3)(B), Movant is appointed as Lead Plaintiff for the class as Movant has the largest financial interest in this litigation and otherwise satisfy the requirements of Fed. R. Civ. P. 23.

2. Pursuant to the PSLRA, Movant has sole authority to bring claims in the multidistrict litigation under the federal securities laws.

3. Movant's choice of counsel is approved, and accordingly, Rosen Law is appointed Lead Counsel.

4. Lead Counsel, after being appointed by the Court, shall manage the prosecution of this litigation for claims under the federal securities laws. Lead Counsel is to avoid duplicative or unproductive activities and is hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) to prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiffs and the Class.

SO ORDERED:

Dated ____________, 2021

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HON. CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE