

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 the Non-Federal Securities Actions

**JOINT MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and the Court's Order dated June 3, 2021 [ECF No. 323], Plaintiffs and Defendants in the cases that are not governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, *et seq.* (collectively, the "Parties"), by and through undersigned counsel, hereby jointly and respectfully move for an entry of a Stipulated Protective Order. The requested protective order will facilitate discovery and maintain confidentiality of materials containing proprietary information, trade secrets, or other confidential or commercially sensitive information.

The Parties hereby agree to and consent to the entry of the proposed Stipulated Protective Order, attached hereto as Exhibit A, and respectfully request that the Court enter such order.

Dated: June 29, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 2021, I electronically filed the forgoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive Notices of Electronic Filing.

By: /s/ Rachel Wagner Furst  
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