UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

IN RE: JANUARY 2021 SHORT SQUEEZE TRADING LITIGATION

This Document Relates to the Non-Federal Securities Actions

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiffs in the cases that are not governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, *et seq.*, by and through undersigned counsel, respectfully submit this unopposed motion for a fourteen-day extension of the schedule set forth in this Court's June 3, 2021 Order [ECF No. 323] (the "June 3rd Order"), for filing master complaints and joint motions to dismiss in the Robinhood, Other Broker, and Antitrust Tranches of this this multidistrict litigation ("MDL").

In support, Plaintiffs state as follows:

1. This motion is brought about by an unanticipated need for additional time for Defendants to produce and Plaintiffs to review "[r]ecords already produced by Defendants to Congress and other government entities [] to Plaintiffs upon request," pursuant to the Court's June 3rd Order. (*Id.* ¶ 6). Plaintiffs sent a request to Defendants on June 3, 2021. Defendants began production of documents on Friday, July 2, 2021, after entry of a Protective Order on July 1, 2021 [ECF No. 329].

2. Plaintiffs are seeking additional time to allow Defendants to produce the government documents in advance of filing master complaints, as the parties continue to engage in meet and confer conferences for purposes of deciding which Defendants to name in the master

complaint(s). The limited productions to date have narrowed certain issues in this case and in at least one tranche have reduced the number of Defendants to be named. An extension will therefore serve judicial economy and aid in the efficient administration of this MDL.

3. The current deadline for Plaintiffs to file master complaints is July 12, 2021. Defendants' joint motions to dismiss are due on August 16, 2021, with responses due September 7, 2021, and replies due September 21, 2021. Plaintiffs have begun receiving documents from five of approximately fifty Defendants, with less than one week before master complaints are due. Some Defendants have only begun rolling productions. For example, Robinhood commenced its production on July 3, 2021, totaling 815 pages, and has advised that it anticipates a production of between 5,000 and 10,000 total documents by Friday, July 9, 2021.

4. A brief extension of fourteen days will provide Plaintiffs with at least one week to review these documents, in advance of filing master complaints by July 26, 2021. Were the extension to be granted, Defendants' joint motions to dismiss would be due August 30, 2021, with responses due September 21, 2021, and replies due October 5, 2021.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order granting a fourteen-day extension of time of the schedule in the Court's June 3rd Order [ECF No. 323].

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A) and (B), undersigned counsel attempted to confer with all defense counsel of record by sending emails on July 6 and July 7, 2021, asking for any objections by close of business July 7, and circulating a draft of this motion. Counsel for Robinhood and counsel for Apex Financial indicated that their clients take no position on the requested relief. No defense counsel raised any opposition to the motion.

Dated: July 7, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2021, I electronically filed the foregoing document with the Clerk for the United States District Court, Southern District of Florida. The electronic case filing system (CM/ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

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