

**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 PROPOSED ORDER REGARDING RULE 502(D)
AND PRIVILEGED MATERIALS ORDER**

Plaintiffs and Defendants in the above-captioned litigation (the “Parties”) jointly move for entry of the attached Stipulated Rule 502(D) and Privileged Materials Order. The Parties respectfully request that this Court enter the attached proposed Order.

LOCAL RULE 7.1 CERTIFICATE

Pursuant to Local Rule 7.1, undersigned counsel hereby certifies that counsel for Plaintiffs and counsel for Defendants conferred with regard to this motion. All of these parties agreed to seek the entry of this proposed Stipulated Rule 502(D) and Privileged Materials Order, and jointly so move.

Respectfully submitted on this 9th day of July, 2021.

Respectfully Submitted,

/s/ Joseph R. Saveri

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (CA SBN 130064)
Steven N. Williams (CA SBN 175489)
Christopher K.L. Young (CA SBN 318371)
Anupama K. Reddy (CA SBN 324873)
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
cyoung@saverilawfirm.com
areddy@saverilawfirm.com

/s/ Peter Safirstein

SAFIRSTSTEIN METCALF LLP

Peter Safirstein (NY SBN 2044550)
Elizabeth S. Metcalf (NY SBN 4644431)
1345 Avenue of the Americas, 2nd Floor
New York, NY 10105
Tel: (212) 201-5845
psafirstein@safirsteinmetcalf.com
emetcalf@safirsteinmetcalf.com

/s/ Natalia M. Salas

THE FERRARO LAW FIRM, P.A.

Natalia M. Salas (FBN 44895)
James L. Ferraro (FBN 381659)
James Ferraro, Jr. (FBN 107494)
Bruce S. Rogow (FBN 067999)
Sean A. Burstyn (FBN 1028778)
600 Brickell Avenue, Suite 3800
Miami, FL 33131
Tel: (305) 375-0111
nms@ferrarolaw.com
jlf@ferrarolaw.com
jjr@ferrarolaw.com
bsr@ferrarolaw.com
sab@ferrarolaw.com

/s/ Frank Schirripa

HACH ROSE SCHIRIPA & CHEVERIE LLP

Frank Schirripa (NY SBN 4103750)
Kathryn Hettler (NY SBN 5126065)
Seth Pavsner (NY SBN 4969689)
Eugene Zaydfudim (NY SBN 5204334)
112 Madison Ave, 10th Floor
New York, New York 10016
Tel: (212) 213-8311
fschirripa@hrsclaw.com
khettler@hrsclaw.com
spavsner@hrsclaw.com
ezaydfudim@hrsclaw.com

Plaintiffs' Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 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.

By: /s/ Rachel W. Furst
Rachel W. Furst

GROSSMAN ROTH YAFFA COHEN, P.A.
2525 Ponce de Leon Blvd Ste 1150
Coral Gables, FL 33134-6040
rwf@grossmanroth.com

Plaintiffs' Liaison Counsel