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 Antitrust Actions

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiffs in the Antitrust Actions ("Antitrust Plaintiffs") by and through their undersigned counsel, respectfully submit this unopposed motion for a thirty-day extension to file an amended complaint in the Antitrust Tranche of this Multidistrict Litigation. The Court ordered that an amended complaint be filed by December 20, 2021 [ECF No. 438]. Antitrust Plaintiffs respectfully request that their time be extended to January 20, 2022.

In support, Antitrust Plaintiffs state as follows:

1. This motion is brought because of a planned trial that co-lead counsel for the Antitrust Plaintiffs, the Joseph Saveri Law Firm ("JSLF"), are engaged in beginning on November 29, 2021. JSLF expects the trial to last approximately four (4) weeks.

2. The Antitrust Plaintiffs advised the Court and the Defendants that JSLF will be in a multi-week jury trial, *In re Capacitors Antitrust Litig.,* No. 17-md-02801, beginning on November 29, 2021 in the "Joint Status Report" filed with the Court on June 2, 2021 (ECF No. 322, fn. 1).

3. A one-month extension will permit JSLF to complete the trial and diligently work with its co-lead counsel, Hach Rose Schirripa & Cheverie, LLP on drafting an amended complaint that addresses the Court's concerns and issues raised in its Order Dismissing The Corrected Consolidated Class Action Complaint [ECF No. 438].

WHEREFORE, Antitrust Plaintiffs respectfully request that the Court enter an order granting a one-month extension of time to January 20, 2022 file an amended complaint.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A) and (B), Plaintiffs' Co-Lead Counsel for the Antitrust Tranche hereby certifies that on November 24, 2021, they attempted to confer via email with all counsel of record for Defendants, who may be affected by the relief sought in this Motion. Counsel for Defendants Robinhood, Citadel Securities, Apex Financial, and E*Trade responded that their clients take no position with respect to the requested relief. Counsel for the remaining Defendants did not respond or raise any opposition to the Motion.

Dated: November 29, 2021

Respectfully submitted,

/s/ Joseph R. Saveri
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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 29, 2021, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF filing system. I further certify that this motion was served on all counsel of record via transmission of the Notice of Electronic Filing generated by the Court's CM/ECF system.

By: */s/ Rachel W. Furst*

Rachel Wagner Furst