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 Other Broker Tranche

PLAINTIFFS' RESTATED OPPOSITION TO DEFENDANT APEX CLEARING CORPORATION'S MOTION FOR EXPANSION OF PAGE LIMITATIONS FOR BRIEFING ON MOTION TO DISMISS PLAINTIFFS' CLASS ACTION COMPLAINT

Plaintiffs Peter Jang and Erik Chavez oppose the motion [ECF Doc. 487] of defendant Apex Clearing Corporation ("Apex") for expanded briefing on the anticipated Motion to Dismiss for the reasons set forth in Plaintiffs' prior Opposition filed June 14, 2022 [ECF Doc. 482]. For the reasons stated therein, there exists no good cause as to why Apex is unable to efficiently argue its positions in accordance with the Court's Order of June 3, 2021 wherein the Court already ordered "special page limits" of 40 pages for the motion to dismiss, 40 pages for the opposition and 20 pages for reply [ECF 323].

Accordingly, Apex's motion should be denied.

Dated: June 16, 2022

Respectfully submitted,

/s/ Peter Safirstein
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**Counsels' Certificates of Understanding have previously been filed*

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2022, 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/ Gary S. Graifman*
Gary S. Graifman