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: All Actions Involving the Federal Securities Laws

PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR ENTRY OF A SCHEDULING ORDER

Lead Plaintiff Blue Laine-Beveridge, named Plaintiffs Abraham Huacuja, Ava Bernard, Brandon Martin, Brendan Clarke, Brian Harbison, Cecilia Rivas, Garland Ragland Jr., Joseph Gurney, Santiago Gil Bohórquez, and Trevor Tarvis (collectively "Plaintiffs") hereby reply in support of their "Motion Requesting Entry of a Scheduling Order re: Amendment of Complaint" (Dkt. # 495) as follows:

The Robinhood Defendants ask the Court to deny Plaintiffs' request for relief because Plaintiffs have not provided a copy of their proposed amended complaint and articulated what their new allegations will be. Dkt. # 499 at 1. But the relief that Plaintiffs sought, first via a stipulated order and now by way of a motion, is entry of a *scheduling order* setting dates on which: Plaintiffs would provide a copy of the proposed amended complaint to the Robinhood Defendants to review, the Robinhood Defendants would decide whether to stipulate that the amended complaint could be filed, and the parties would brief either a motion to amend or a motion to dismiss. Dkt. # 495 at 5. Although they initially deemed it unnecessary, the Robinhood Defendants have no basis to oppose this procedural motion.

In their opposition brief, the Robinhood Defendants now take the position that they will not stipulate to amendment of the complaint and that a motion to amend will be required. Dkt. # 499 at 1. Therefore, the first three sets of dates in the proposed schedule appear to be unnecessary. Plaintiffs hereby modify the relief initially sought and request that any schedule adopted by the Court commence with the filing of a motion to amend on August 19, 2022.

Dated: August 2, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Laurence M. Rosen