

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

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

In re: JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION

This Document Relates to: All Actions Involving the Federal Securities Laws

**DECLARATION OF LAURENCE M. ROSEN IN FURTHER SUPPORT OF THE
MOTION TO CONSOLIDATE AND DISCONTINUE THE NOTICED
LEAD PLAINTIFF PROCESS AS MOOT**

Laurence M. Rosen hereby declares under penalty of perjury:

1. I am the Managing Partner of The Rosen Law Firm, P.A., Lead Counsel for Lead Plaintiff Blue Laine-Beveridge, named plaintiffs Abraham Huacuja, Ava Bernard, Brendan Clarke, Brian Harbison, Cecilia Rivas, Doi Nguyen, Joseph Gurney, Marcel Poirier, Sandy Ng, Santiago Gil Bohórquez, and Thomas Cash (collectively “Plaintiffs” or “Proposed Class Representatives”). I make this Declaration in further support of the Plaintiffs’ motion to: (1) consolidate a putative federal securities class action transferred to this Court by the JMDL Panel, styled *Maurice Scarborough et al v. Robinhood Financial LLC et al.*, No. 23-02622, originally filed in the Central District of California on April 6, 2023 (the “Scarborough Action”), with the other cases in the Federal Securities Laws Tranche; and (2) discontinue as moot the noticed lead plaintiff process with respect to the Scarborough Action.

2. I am an attorney duly licensed to practice in the State of Florida and before this Court. I have personal knowledge of the matters set forth herein and, if called upon, I could and would completely testify thereto.

3. Attached hereto as Exhibit F is a true and correct copy of a notice issued pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) in *Halman Aldubi Provident & Pension Funds Ltd. v. Teva Pharm. Indus. Ltd.*, 529 F. Supp. 3d 385 (E.D. Pa. 2021).

4. Attached hereto as Exhibit G is a true and correct copy of a PSLRA early notice issued in *In re New Oriental Educ. & Tech. Grp. Secs. Litig.*, 293 F.R.D. 483 (S.D.N.Y. 2013).

5. Attached hereto as Exhibit H is a true and correct copy of a PSLRA early notice issued in *Hall v. Medicis Pharm. Corp.*, 2009 WL 648626 (D. Ariz. Mar. 11, 2009).

6. Attached hereto as Exhibit I is a true and correct copy of a PSLRA early notice issued in *Khunt v. Alibaba Grp. Holding Ltd.*, 102 F. Supp. 3d 523 (S.D.N.Y. 2015).

7. Attached hereto as Exhibit J is a true and correct copy of a PSLRA early notice issued in *In re Bank of Am. Corp. Secs., Derivative & ERISA Litig.*, 258 F.R.D. 260 (S.D.N.Y. 2009).

I declare under the penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed: June 16, 2023

THE ROSEN LAW FIRM, P.A.

/s/Laurence M. Rosen

Laurence M. Rosen, Esq., Fla. Bar No. 0182877

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, 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