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 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 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. Since the Lead Plaintiff Order was issued on October 15, 2021, neither counsel in the Scarborough Action, nor counsel for any other injured investors, requested that Lead Plaintiff pursue claims in the Federal Securities Laws Tranche on behalf of options traders.

4. A good faith conference seeking to obtain the relief requested by this motion took place telephonically on May 18, 2023. Counsel for the Scarborough Action was asked numerous times why they suddenly decided, in April 2023, to file a new class action on behalf of options traders long after the PSLRA lead plaintiff process had concluded. They repeatedly stated that it was irrelevant why they waited so long to file claims on behalf of injured options traders and claimed that they had received a number of inquiries from options investors.

5. We understand that there are more than 4,500 unique types of call options for the companies at issue in the Scarborough Action complaint, with GME alone having more than 2,000 call contract types outstanding during the class period.

6. Attached hereto as Exhibit A is a true and correct copy of an email from Jeffrey Klafter to Laurence Rosen, dated March 31, 2023.

7. Attached hereto as Exhibit B is a true and correct copy of an email from Jeffrey Klafter to Laurence Rosen, dated May 5, 2023.

8. Attached hereto as Exhibit C is a true and correct copy of an email from Stuart Chelin to Laurence Rosen and Kevin Orsini, dated May 10, 2023.

9. Attached hereto as Exhibit D is a true and correct copy of the Class Action Complaint styled *Maurice Scarborough et al v. Robinhood Financial LLC et al.*, No. 23-02622 (C.D. Cal. Apr. 6, 2023).

10. Attached hereto as Exhibit E is a true and correct copy of the purported PSLRA notice that Klafter Lesser LLP, counsel in the Scarborough Action, issued on April 10, 2023, entitled "Notice of Filing Securities Class Action Against Robinhood Markets, Inc. – HOOD."

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

Executed: May 26, 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 May 26, 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