

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

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

In re:

**JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION**

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This Document Relates to
Case No. 1:23-cv-21572 -CMA

**DECLARATION OF JEFFREY A. KLAFTER IN SUPPORT OF THE MOTION OF
MOVANTS MAURICE SCARBOROUGH AND SCOTT SCHILLER FOR: (1)
APPOINTMENT AS LEAD PLAINTIFFS; AND (2) APPROVAL OF THEIR
SELECTION OF LEAD COUNSEL**

Jeffrey A. Klafter hereby declares under penalty of perjury:

1. I am the Managing Partner of Klafter Lesser LLP (the “Klafter Lesser Firm”), proposed Lead Counsel, together with the Pessah Law Group, PC (the “Pessah Firm”), for Lead Plaintiff Movants Maurice Scarborough and Scott Schiller (“Movants”). I make this Declaration in support of the Movants’ motion for (1) appointment as Lead Plaintiffs; and (2) approval of their selection of the Klafter Lesser Firm and the Pessah Firm as Lead Counsel. I have been admitted *pro hac vice* in this MDL pursuant to Pre-Trial Order No. 1 at ¶ 9 (ECF No. 46). I have personal knowledge of the matters set forth herein and, if called upon, could and would completely testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the PSLRA Options Notice published by my firm on April 10, 2023 by means of PR Newswire.

3. Attached hereto as Exhibit B are true and correct copy of each Movant’s PSLRA Certification, which were attached to the Complaint Movants’ filed. ECF No. 1 in 1:23-cv-21572 -CMA.

4. Attached hereto as Exhibit C is a true and correct copy of a loss chart evidencing Movants’ financial interest in the claims of the Options Class.

5. Attached hereto as Exhibit D is the Firm Resume of the Klafter Lesser Firm.

6. Attached hereto as Exhibit E is the Firm Resume of the Pessah Firm.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed June 9, 2023

KLAFTER LESSER LLP

/s/ Jeffrey Klafter

Jeffrey A. Klafter

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 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/ Jeffrey Klafter