

EXHIBIT 16

**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 the Federal Securities Tranche

DECLARATION OF BRENDAN CLARKE IN SUPPORT OF CLASS CERTIFICATION

I, Brendan Clarke, declare as follows:

1. I respectfully submit this declaration in support of Plaintiffs' motion for class certification. I have personal knowledge of the statements herein and if called upon as a witness, could and would competently testify hereto.

2. I am currently serving as a named Plaintiff in the above-captioned action (the "Action"), a securities class action asserting market manipulation claims against Robinhood Markets, Inc. and two of its wholly owned subsidiaries, Robinhood Financial, LLC and Robinhood Securities, LLC (collectively, "Robinhood").

3. I understand that the Action alleges that Robinhood imposed trading restrictions, including turning off the buy button, for a number of securities including common stock in AMC Entertainment Holdings, Inc. ("AMC"), Bed Bath & Beyond Inc. ("BBBY"), BlackBerry Ltd. ("BB"), Express Inc. ("EXPR"), GameStop Corp. ("GME"), Koss Corp. ("KOSS"), Tootsie Roll Industries Inc. ("TR"), and American Depositary Shares of foreign-issuers Nokia Corp. ("NOK") and trivago N.V. ("TRVG") (these nine collectively, the "Affected Stocks") between January 28, 2021 and February 4, 2021. The Action alleges that Robinhood restricted the Affected Stocks

because Robinhood did not have sufficient liquidity to meet its collateral requirements, but did not disclose the reason for its restrictions. Robinhood's restrictions caused the prices of the Affected Stocks to fall. I believe the Action is meritorious.

4. In connection with Plaintiffs' motion for class certification, I am now moving to serve as a Court-appointed Class Representative. I understand that if appointed as a Class Representative, I would represent not only myself, but also the proposed Class consisting of all persons or entities who held shares of the Affected Stocks as of the close of trading on January 27, 2021, and sold any such shares between January 28, 2021, and February 4, 2021.

5. I understand that Court-appointed Lead Plaintiff Blue Laine-Beveridge, and the other named plaintiffs, Abraham Huacuja, Ava Bernard, Brian Harbison, Cecilia Rivas, Doi Nguyen, Joseph Gurney, Marcel Poirier, Sandy Ng, Santiago Gil Bohórquez, and Thomas Cash are also seeking to be Class Representatives. If appointed, we will all serve as Class Representatives.

6. I understand that if appointed as a Class Representative, I have a fiduciary duty to act in the interests of all other investors who are members of the Class. As such, I am committed to vigorously prosecuting this Action on behalf of the Class, and to at all times exercising my good faith and sound judgment to seek a recovery that is fair and beneficial for the Class.

7. To date, I have participated in this Action by, among other things, reaching out to The Rosen Law Firm ("Lead Counsel") to join the action, communicating by phone and email with Lead Counsel, reviewing and approving pleadings and otherwise monitoring the progress and status of the Action, joining periodic group calls with the other proposed Class Representatives and Lead Counsel to discuss the progress of the litigation, collecting and producing documents to Defendants, and sitting for my deposition on March 24, 2023.

8. Based on my involvement in this Action, I believe that The Rosen Law Firm possesses the necessary expertise and resources to prosecute this Action effectively, and that The Rosen Law Firm has thus far prosecuted this Action effectively – including by drafting a pleading that survived Defendants’ motion to dismiss.

9. Should I be appointed as a Class Representative, I will fulfill my fiduciary duty to the Class and continue to work with Lead Counsel to make sure that the Class continues to receive the best possible representation so as to ensure the success of this lawsuit.

10. If appointed as a Class Representative, I will continue to participate in this Action to keep informed of its status and progress, the strengths and weaknesses of the case, and the prospects for settlement. I will continue to consult with Lead Counsel with respect to significant developments in this Action. I will perform all of these duties mindful of my responsibility of serving what I, in good faith and in consultation with Lead Counsel, believe to be the best interests of the Class.

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

Executed on 4/20/2023

DocuSigned by:
Brendan Clarke
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BRENDAN CLARKE