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Subject: Joint Status Report: Case 1:21-md-02989-CMA IN RE: January 2021 Short Squeeze Trading Litigation
Date: Friday, August 11, 2023 10:21:00 AM
Attachments: image001.png
Order on 8-10-23 re case status.pdf

Dear Counsel:

Judge Altonaga issued the attached order.

It requests that The Rosen Law Firm, as lead counsel in the Federal Securities Tranche for the MDL, coordinate all plaintiffs' responses to the four questions that the Court posed on pages 4-5 of the Order. See Footnote 2 on page 4.

Please respond to this email and provide to me your position as to each of the four questions. I will then prepare a single response for all plaintiffs. I will then send the response to each plaintiff attorney for your review prior to our submission to the court. If you have revisions you can provide them to me before I file the response on ECF.

To the extent any attorneys or groups of attorneys have a single response for their group, please provide a single group response and a list of the attorneys/cases for which the group speaks.

The Four Questions are as follows:

1. Do the parties disagree with the Court's above characterization of the status of consolidation? If so, please detail any disagreement and include citations to the record and legal authority.

   Please provide a response to Question 1.

2. What is the complete list of cases that correspond to the Federal Securities Tranche?

   In footnote 3, the court lists the following cases. If you believe any other cases should be added to this list or any cases deleted from the list please let me know.

   Daniels v. Robinhood Financial, LLC, et al., No. 21-cv-21261 (filed Jan. 28, 2021); Days v. Robinhood Markets, Inc., et al., No. 21-cv-21310 (filed Jan. 28, 2021); Diamond v. Robinhood Financial, LLC, et al., No. 21-cv-21263 (filed Jan. 29, 2021); Lagmanson et al. v. Robinhood Markets, Inc., et al., No. 21-cv-21298 (filed Jan. 29, 2021); Gossett et al. v. Robinhood Financial, LLC, et al., No. 21-cv-21293 (filed Jan. 29, 2021); Muncy v. Robinhood Securities, LLC, et al., No. 21-cv-21307 (filed Feb. 2, 2021); Krumenacker v. Robinhood Financial LLC, et al., No. 21-cv-21343 (filed Feb. 2, 2021); Kadin v. Robinhood Financial LLC, et al., No. 21-cv-21511 (filed Mar. 25, 2021); Quat et al. v. Robinhood Financial, LLC, et al., No. 21-cv-21404

(filed Apr. 12, 2021); Best et al. v. Robinhood Financial, LLC, et al., No. 21-cv-21534 (filed Apr. 21, 2021); Eisen v. Apex Clearing Corp, et al., No. 21-cv-21665 (filed Apr. 30, 2021); Carrasco v. Robinhood Financial LLC, et al., No. 21-cv-22702 (filed May 25, 2021); and Scarborough v. Robinhood Financial, LLC, No. 1:23-cv-21572 (filed Apr. 6, 2023).
The Diamond and Kadin actions were voluntarily dismissed. (See Apr. 20, 2021 Order [ECF No. 214]; Apr. 28, 2021 Order [ECF No. 272]).

3. What is the status of Eisen v. Apex Clearing Corp, et al., No. 21-cv-21665 (filed Apr. 30, 2021), a federal securities class action case brought against Apex Clearing Corporation and Interactive Brokers, LLC?

   I have spoken with the attorney who filed that case and will provide his response to the court once he has finalized it.

4. Apart from the Motion to Consolidate the Scarborough action, do the parties intend to seek further consolidation under Rule 42 of actions in the Federal Securities Tranche? If so, which actions and what degree of consolidation?

   Please provide a response to question 4.

Please provide your responses by Wednesday August 16. This will give me time to combine all the responses into a single document and provide them to each attorney for review and then make any necessary changes prior to our submission to the Court on August 23.

Thank you.

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