UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

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 PLAINTIFFS' MOTION FOR RECONSIDERATION OF THE COURT'S ORDER DENYING PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

I, Laurence M. Rosen, hereby declare under penalty of perjury:

1. I am the Managing Partner of The Rosen Law Firm, P.A. ("Rosen Law"), 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").

2. I make this Declaration in support of Plaintiffs' Motion for Reconsideration of the Court's Order Denying Plaintiffs' Motion for Class Certification.

3. 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.

4. Pursuant to the Court's scheduling order, Plaintiffs provided Robinhood with a merits expert report pertaining to loss causation and damages. The report contains a per share damages model that isolates price declines caused solely by the trading restrictions' removal of Robinhood's customer demand for the Affected Stocks from the market and a method by which each class member can easily calculate damages for sales of each stock on each day of the Class Period.

5. The expert report also provides an alternative damages model that measures per share damages using event studies that disaggregate price declines unrelated to Robinhood's restrictions.

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

Executed: May 2, 2024

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 2, 2024, 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