UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-MD-02989-ALTONAGA

In re:

JANUARY 2021 SHORT SQUEEZE TRADING LITIGATION
_____/

This Document Relates the Federal Securities Tranche

STATUS REPORT

Defendants Robinhood Markets, Inc., Robinhood Financial LLC, and Robinhood Securities, LLC (collectively, "Robinhood") respectfully provide this report on the status of Robinhood's efforts to confer with the outstanding individual securities plaintiffs regarding Robinhood's forthcoming motion to compel arbitration. Robinhood reports as follows:

1. On September 18, 2024, the Court convened the parties in this multidistrict litigation ("MDL") for a Status Conference to address "the status of each Tranche"; "what types of individual claims for each Tranche remain, given dismissal of several Complaints"; "what additional pre-trial activities . . . may be necessary" for the remaining claims in the consolidated cases; and "whether Lead Counsel for the Federal Securities Tranche wishe[d] to remain as Lead Counsel for that Tranche, now that a putative class no longer exists . . . ." *See* Order [ECF No. 697] (alterations added).

2. At the Status Conference, the Court heard from counsel for Robinhood, lead counsel for each of the Tranches within this MDL, and counsel for Plaintiffs Marcus Lagmanson, Anthony Reyes, and Brian Belderrain (collectively, the "*Lagmanson* Plaintiffs").

3. As part of the "additional pre-trial activities" necessary for the remaining consolidated claims, counsel for Robinhood informed the Court that Robinhood plans to move to

compel arbitration of the remaining securities claims, except for those asserted by the *Lagmanson* Plaintiffs. The remaining securities claims that Robinhood intends to seek arbitration of, with their respective Southern District of Florida case numbers (collectively, the "Outstanding Securities Claims"), are:

- *Best v. Robinhood Financial, LLC*, No. 21-cv-21534;
- *Carrasco v. Robinhood Financial LLC*, No. 21-cv-22702;
- *Daniels v. Robinhood Financial, LLC*, No. 21-cv-21261;
- *Days v. Robinhood Markets, Inc.*, No. 21-cv-21310;
- *Gatz v. Robinhood Financial, LLC*, No. 21-cv-21296;
- *Gossett v. Robinhood Financial, LLC*, No. 21-cv-21293;
- *Scarborough v. Robinhood Financial LLC*, No. 23-cv-21572;
- *Krumenacker v. Robinhood Financial, LLC*, No. 21-cv-21343; and
- *Quat v. Robinhood Financial, LLC*, No. 21-cv-21404.

4. At the Status Conference, counsel for Robinhood requested three weeks to engage in the pre-filing conferral process required by Local Rule 7.1 regarding Robinhood's forthcoming motion to compel arbitration.

5. The conferral process is well under way. Robinhood has been communicating with all counsel of record for the Outstanding Securities Claims, except for one who has not yet responded to Robinhood's several attempts to get in contact by email and telephone. The remaining counsel have responded to state their consent or objection to Robinhood's forthcoming motion to compel arbitration, or have affirmed that they are still conferring with their clients.[1]

[1] Robinhood will specify in the motion to compel arbitration each party's final position on consenting or objecting to arbitration.

6. The conferral process has also led to substantive settlement negotiations. As a result of these negotiations, Robinhood expects that at least some of the Outstanding Securities Claims will be resolved and dismissed before Robinhood files its motion to compel arbitration. For example, Robinhood and Plaintiff Damon Muncy have already stipulated to the dismissal with prejudice of Mr. Muncy's outstanding securities claims. *See* Joint Stip. of Voluntary Dismissal with Prejudice [ECF No. 703].

7. Given the ongoing nature of the conferral process and the settlement negotiations associated with that process, Robinhood respectfully suggests that the Court establish a deadline of December 9, 2024, for Robinhood to file its motion to compel arbitration. This will give the parties sufficient time to continue investigating the individual claims and finalize any successful settlement negotiations prior to the filing of Robinhood's motion.

Dated: October 9, 2024

Respectfully submitted,

/s/ Samuel A. Danon

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CERTIFICATE OF SERVICE

I certify that on October 9, 2024, I electronically filed a true and correct copy of the foregoing via CM/ECF, which will send notice to all counsel of record.

/s/ Samuel A. Danon