

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-MDL-02989-ALTONAGA

In re:

**JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION**

This Document Relates to the Federal Securities Tranche

JOINT STIPULATION OF VOLUNTARY DISMISSAL WITH PREJUDICE

Plaintiffs Abe Kurdi, Eric Quat, Igor Kravchenko, Jordan Krumenacker, Michael McFadden, Michael Ross, Teodoro Russell Pueyrredon, and Tenzin Woiser (“Plaintiffs”) and Defendants Robinhood Markets, Inc., Robinhood Securities, LLC and Robinhood Financial LLC (collectively, “Robinhood” or “Defendants”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, one or more disputes arose between Plaintiffs and Robinhood (collectively, the “Parties”), including in the litigations styled *Quat v. Robinhood Financial LLC*, No. 21-cv-21404 (S.D. Fla.) and *Krumenacker v. Robinhood Financial LLC*, No. 21-cv-21343 (S.D. Fla.), both of which were transferred to *In re January 2021 Short Squeeze Trading Litigation*, Case No. 1:21-md-02989 (S.D. Fla.) (the “Action”);

NOW, THEREFORE, Plaintiffs¹ and Defendants hereby stipulate, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and voluntarily agree, to the dismissal of Plaintiffs’ claims

¹ This Stipulation does not apply to the claims of Plaintiff Aaron Fassinger, a Plaintiff in the *Quat v. Robinhood Financial LLC*, No. 21-cv-21404 (S.D. Fla.) matter. At this time, this Stipulation represents only a partial dismissal of the *Quat* matter with regards to the individual claims of the Plaintiffs specifically named herein, as Plaintiff Fassinger may continue to pursue his claims against Defendants.

with prejudice in the Action against all Defendants. The Parties hereby further stipulate and agree to the following terms of the dismissal: (1) neither side will seek costs nor fees from the other; (2) all parties acknowledge that each have complied with Rule 11 and waive any arguments with respect thereto; and (3) the Court shall retain jurisdiction for the sole purpose of enforcing the agreements entered into by Plaintiffs with Defendants to dismiss Plaintiffs' individual claims.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: January 29, 2025

Respectfully submitted,

BURSOR & FISHER, P.A.

/s/ Sarah N. Westcot

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