Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

IN RE:
JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION
_____/

This Document Relates to:
The Federal Securities Tranche

[PROPOSED] SCHEDULING ORDER

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, Local Rule 16.1(b)(3) of the Local Rules of the United States District Court for the Southern District of Florida, upon consideration of the Joint Planning and Scheduling Report filed by the parties in the above-styled matter, and this Court being otherwise fully advised in the premises, it is:

ORDERED AND ADJUDGED as follows:

A. Track:

This case shall be assigned to a complex case management track that allows for 12 months of fact discovery from the date of the scheduling order.

B. The parties shall adhere to the following schedule:

Plaintiffs to identify additional class representatives for Class Certification	November 17, 2022 (30 Days from the Date of this Order)
Deadline to join additional defendants or to file motion to amend pleadings.	February 15, 2023 (120 Days from the Date of This Order)
The parties shall select a mediator pursuant to Local Rule 16.2, shall schedule a time, date and place for mediation, and shall jointly file a proposed order scheduling mediation in the form specified on the Court's website, http://www.flsd.uscourts.gov. If the parties cannot agree on a mediator, the Clerk shall designate a certified mediator on a blind rotation basis. Counsel for all parties shall familiarize themselves with and adhere to all provisions of Local Rule 16.2. Within seven (7) days of mediation, the parties are required to file a mediation report with the Court. Pursuant to the procedures outlined in the CM/ECF Administrative Procedures, the proposed order must be emailed to altonaga@flsd.uscourts.gov in Word format.	December 19, 2022 (60 Days From the Date of This Order)
Plaintiffs shall file a motion for class certification (including any opening class certification expert report(s)).	January 13, 2023
Defendants shall complete the depositions of all proposed class representatives and plaintiffs' class certification experts	March 29, 2023 (75 days after Motion for Class Certification is Filed)
Defendants shall file opposition to class certification (including any opposing expert witness reports)and any *Daubert* motions related to expert witnesses on issues of class certification..	April 13, 2023 (90 days after Motion for Class Certification is Filed)
Parties shall fully complete production of documents. Parties agree to commence producing documents on a rolling basis as much as is possible in advance of this deadline.	April 18, 2023 (Six Months From the Date of this Order)
Plaintiffs shall file reply brief in support of motion for class certification, rebuttal expert reports, Daubert motions relating to Defendants' class certifications expert reports, and any opposition to Defendants' class certification *Daubert* motions	May 30, 2023 (45 days after class certification opposition papers filed)
Defendants' shall file any replies in support of *Daubert* motions relating to class certification.	June 29, 2023 (30 days after Plaintiffs' Opposition is Filed)
Plaintiffs shall file any replies in support of their *Daubert* motions relating to class certification.	July 1, 2023 (30 days after Defendants' Opposition is Filed)
Parties must have completed mediation and filed a mediation report.	August 14, 2023 (300 Days From the Date of This Order)
Close of fact discovery including depositions.	October 18, 2023 (12 Months From Date of This Order)

Plaintiffs shall provide expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2)(A)-(C).	December 18, 2024 (60 Days from the Close of Fact Discovery)
Defendants shall provide expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2)(A)-(C).	February 16, 2024 (60 Days After Plaintiff Expert Reports)
Plaintiffs shall provide rebuttal expert reports,	April 1, 2024 (45 Days After Defendants' Expert Reports)
All discovery, including expert depositions, is completed. Depositions of expert witnesses shall not commence until after Plaintiffs provide rebuttal expert reports, if any.	April 16, 2024 (60 Days After Defendant Expert Reports)
All summary judgment and *Daubert* motions (which include motions to strike experts) are filed. Each motion shall be governed by Local Rule 7.1. Leave to exceed the 20-page limit in Local Rule 7.1(c) will be granted if the issues addressed in either the summary judgment motion or any *Daubert* motions cannot be addressed within those page limits. The parties are reminded that *Daubert* motions must contain the Local Rule 7.1(a)(3) certification. The parties further propose that all oppositions to summary judgment motions and *Daubert* motions be due 60 days after such motions are filed (September 17, 2024) and replies be due 45 days after opposition (November 1, 2024).	June 17, 2024 (60 Days After Close of All Discovery)
Parties submit joint pre-trial stipulation, proposed jury instructions and verdict form, or proposed findings of fact and conclusions of law, as applicable.	60 Days After a Decision is Rendered on Dispositive Motions Including Summary Judgment
Motions *in limine* directed to trial evidence due. The parties are reminded that motions *in limine* must contain the Local Rule 7.1(a)(3) certification.	14 Days Before Commencement of Trial.

IT IS FURTHER ORDERED as follows:

Pretrial motions will be resolved, to the extent feasible, within ____ days of the close of fact discovery. The pretrial conference will be held at _____, on_____.

Trial will begin at_____, on_____.

DONE AND ORDERED in Chambers, at Miami-Dade County, Florida, this _____ day of _____, 2022.

_____

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE