Exhibit 2

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 modified complex case management track that allows for 11 months of fact discovery from the date of the scheduling order.

B. The parties shall adhere to the following schedule:

Deadline to join additional parties or to file motion to amend pleadings.	December 19, 2022
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
Plaintiffs shall file any expert witness reports on issues of class certification.	January 13, 2023
Defendants shall file any expert witness reports in opposition on issues of class certification.	February 27, 2023
Plaintiffs shall file any reply expert witness reports on issues of class certification.	March 29, 2023
Depositions of expert witnesses on issues of class certification shall be completed. Plaintiffs shall file motion for class certification. The parties shall file any *Daubert* motions related to expert witnesses on issues of class certification.	April 28, 2023
Parties shall substantially complete production of documents. Parties agree to commence producing documents on a rolling basis as is possible in advance of this deadline.	May 1, 2023
Defendants shall file opposition to Plaintiffs' motion for class certification and the parties shall file any oppositions to *Daubert* motions relating to class certification.	June 7, 2023
Plaintiffs shall file reply in support of motion for class certification and the parties shall file any replies in support of *Daubert* motions relating to class certification.	June 30, 2023
Parties must have completed mediation and filed a mediation report.	August 14, 2023
Close of fact discovery including depositions.	September 18, 2023
Plaintiffs shall provide expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2)(A)-(C).	October 18, 2023

Defendants shall provide expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2)(A)-(C).	December 18, 2023
Plaintiffs shall provide any rebuttal expert reports.	January 18, 2024
All discovery, including expert depositions, is completed. Depositions of expert witnesses shall not commence until after Plaintiffs provide rebuttal expert reports, if any.	February 16, 2024
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 (June 17, 2024) and replies be due 45 days after opposition (August 1, 2024).	April 16, 2024
Parties submit joint pre-trial stipulation, proposed jury instructions and verdict form, or proposed findings of fact and conclusions of law, as applicable.	45 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