UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

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 JOINT STATUS REPORT IN RESPONSE TO THE COURT'S AUGUST 9, 2023 ORDER (ECF589)

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

1. I am the Managing Partner of The Rosen Law Firm, P.A., 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 the Joint Status Report In Response To The Court's August 9, 2023 Order (ECF589) (the "Status Order").

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. After doing an independent search for any additional cases alleging federal securities claims, on August 11, 2023, I emailed all of the plaintiffs' counsel in the cases enumerated in the Status Order as consolidated into the above-styled MDL Federal Securities Law Tranche and asked that counsel provide responses to the four questions presented by the Court for inclusion of their answers in a joint status report. My email attached the Court's Status Order.

5. Attached hereto as Exhibit A is a true and correct copy the August 11, 2023, email.

6. On August 17, 2023, I sent a follow up email to those counsel that did not respond to my August 11, 2023, email requesting that they please email to me responses to the Court's four questions for inclusion in a joint status report.

7. Attached hereto as Exhibit B is a true and correct copy of the second email I sent on August 17, 2023.

8. On August 22, 2023, I emailed all counsel (to whom I sent the August 11, 2023 email), enclosing for their review, a draft of the joint status report that I intended to file with the Court on behalf of plaintiffs, asking them to comment and provide any suggested changes. Attached as Exhibit C is the August 22, 2023, email to all plaintiffs' counsel.

9. To date, counsel for the following cases have not responded to any of my August 11, 17 or 22, 2023 emails: (*Diamond v. Robinhood Financial, LLC, et al*., No. 21-cv-21263; *Lagmanson et al. v. Robinhood Markets, Inc*., et al., No. 21-cv-21298; and *Carrasco v. Robinhood Financial LLC, et al*., No. 21-cv-22702).

10. On August 22, 2023, counsel for Robinhood brought to my attention that another case, not previously identified by the Court's Status Order had been brought in the Northern District of Illinois and consolidated into this MDL. That case is *Gatz v. Robinhood Financial, LLC*, No. 1:21-cv-00490 which was originally filed in Northern District of Illinois.

11. On August 22, 2023, I telephoned Mr. Gatz, an attorney who filed the case *pro se*, and also emailed him a copy of the Status Order.

12. Mr. Gatz then stated to me his responses to the Court's four questions for inclusion in the Joint Status Report.

13. Attached as Exhibit D is a list of all fourteen cases consolidated in the MDL that alleged federal securities laws claims showing the various other types of claims alleged in each complaint (State Law, Antitrust, Other Brokers), a list of the defendants named in the actions, and the names and email addresses of counsel for the parties in these actions.

14. On August 10, 2023, I contacted Adrian Gucovschi, attorney for the plaintiff in *Eisen v. Apex Clearing Corp., et al*., No. 21-cv-21665 to determine the status of the *Eisen* case.

15. Mr. Gucovschi has informed me that the parties in the *Eisen* case intend to voluntarily dismiss the action. Counsel for the defendants in the *Eisen* action have confirmed that.

I declare under penalty of perjury under the laws of the United States of America and the State of Florida that the foregoing is true and correct.

Executed: August 23, 2023

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 August 23, 2023, 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