

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

IN RE: CARNIVAL CORP.
SECURITIES LITIGATION

Case No. 1:20-cv-22202-KMM

ABRAHAM ATACHBARIAN, Individually
and On Behalf of All Others Similarly
Situated,

Case No. 1:20-cv-23011-RNS

Plaintiff,

vs.

CARNIVAL CORPORATION, CARNIVAL
PLC, ARNOLD W. DONALD, DAVID
BERNSTEIN, and MICKY ARISON,

Defendants.

**NOTICE OF MOTION AND MOTION OF MOVANT JOSEPH FUSCALDO TO: (1)
CONSOLIDATE RELATED ACTIONS; (2) APPOINT LEAD PLAINTIFF; AND (3)
APPROVE SELECTION OF COUNSEL**

Plaintiff Joseph Fuscaldo (“Movant”), pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), hereby moves this honorable Court on a date and at such time as may be designated by the Court, for an Order: (1) consolidating the related Securities Class Actions; (2) appointing Movant as Lead Plaintiff; (3) approving the Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel; and (4) granting such other and further relief the Court may deem just and proper.

In support of this Motion, Movant submits herewith a Memorandum of Law, the Declaration of Laurence Rosen, and a [Proposed] Order, all dated July 27, 2020.

Local Rule 7.1(a)(3) requires a conference of counsel prior to filing motions. Due to the lead plaintiff procedure of the PSLRA, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the conferral requirement of Local Rule 7.1(a)(3) be waived.

Dated: July 27, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/Laurence Rosen

Laurence Rosen, Fla. Bar No. 0182877

275 Madison Avenue, 40th Floor

New York, New York 10016

Telephone: (212) 686-1060

Fax: (212) 202-3827

Email: lrosen@rosenlegal.com

*[Proposed] Lead Counsel for
Plaintiff and the Class*

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2020, 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 Rosen