

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

Case Nos. 1:20-cv-24111-KMW and 1:20-cv-24407-PCH

(Judge Kathleen M. Williams and Magistrate Judge Chris M. McAiley,
& Judge Paul C. Huck and Magistrate Judge Jacqueline Becerra, respectively.)

CITY OF RIVIERA BEACH GENERAL
EMPLOYEES RETIREMENT SYSTEM,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

ROYAL CARIBBEAN CRUISES LTD.,
RICHARD FAIN, JASON LIBERTY, and
MICHAEL BAYLEY,

Defendants.

Case No. 1:20-cv-24111-KMW-CMM

THOMAS ALTOMARE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROYAL CARIBBEAN CRUISES LTD.,
RICHARD FAIN, JASON LIBERTY, and
MICHAEL BAYLEY,

Defendants.

Case No. 1:20-cv-24407-PCH-JB

**MICHAEL GRECO'S MOTION FOR CONSOLIDATION OF THE RELATED
ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF COUNSEL**

Proposed Lead Plaintiff Michael Greco ("Movant"), by his counsel, hereby moves this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for entry of an Order (attached hereto): (i) consolidating the above-

captioned actions (the “Related Actions”); (ii) appointing Movant as Lead Plaintiff; (iii) approving Movant’s selection of the law firm of Levi & Korsinsky, LLP (“Levi & Korsinsky”) to serve as Lead Counsel for the putative Class and the law firm of Cullin O’Brien Law, P.A. (“O’Brien Law”) to serve as Liaison Counsel; and (iv) granting such other relief as the Court may deem just and proper. This motion is based on the accompanying Memorandum of Law in support thereof, the Declaration of Cullin O’Brien filed herewith and all exhibits attached thereto, the pleadings and other filings herein, and such other written and oral arguments as may be permitted by the Court.

COMPLIANCE WITH CIVIL LOCAL RULE 7.1(a)(3)

The PSLRA provides that within 60 days after publication of the required notice, any member of the proposed class may apply to the Court to be appointed as lead plaintiff, whether or not they have previously filed a complaint in the underlying action. Consequently, Movant’s counsel has no way of knowing who, if any, the competing lead plaintiff candidates are at this time. As a result, counsel for Movant has been unable to conference with opposing counsel as prescribed in Local Rule 7.1(a)(3), and respectfully requests that the conference requirement of Local Rule 7.1(a)(3), be waived for this motion. Pursuant to §78u-4(a)(3)(B)(iii)(II), Defendants do not have standing to oppose the appointment of Movant as lead plaintiff. See *Hill v. Accentia Biopharmaceuticals, Inc.*, No. 8:13-cv-1945-T-23EAJ, 2013 U.S. Dist. LEXIS 170982, at *3-5 (M.D. Fla. Dec. 4, 2013).

Dated: December 7, 2020

Respectfully submitted,

/s/ Cullin O’Brien
Cullin O’Brien
Florida Bar No. 0597341
CULLIN O’BRIEN LAW, P.A.

6541 NE 21st Way
Fort Lauderdale, Florida 33308
Tel: (561) 676-6370
Fax: (561) 320-0285
E-mail: cullin@cullinobrienlaw.com

Proposed Liaison Counsel for Movant and the Class

Shannon L. Hopkins (*pro hac vice* forthcoming)
LEVI & KORSINSKY, LLP
1111 Summer Street, Suite 403
Stamford, CT 06905
Tel: 203-992-4523
Fax: 212-363-7171
Email: shopkins@zlk.com

Proposed Counsel for Movant and the Class

CERTIFICATE OF SERVICE

I HEREBY certify that on December 7, 2020, I electronically filed the foregoing document with the Clerk of the Court CM/ECF.

/s/ Cullin O'Brien
Cullin O'Brien