

duration of these additional investigations and granting related relief, and respectfully states as follows:

JURISDICTION, VENUE, AND STANDING

1. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the amended standing order of reference issued by the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. §157(b).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases and other authority for the relief requested herein are sections 105 and 1104(c)(2) of the Bankruptcy Code and Local Rule 9018-1(d). In addition, paragraph 2 of the Examination Scope Order authorizes the Examiner to seek authorization to conduct additional investigations.

4. Pursuant to Local Rule 9013-1(f), the Examiner consents to this Court’s entry of a final order in connection with this Motion to the extent it is later determined the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

BACKGROUND

5. On November 11 and 14, 2022, the Debtors filed voluntary chapter 11 petitions in the United States Bankruptcy Court for the District of Delaware (the “Court”). On December 15, 2022, the United States Trustee for Region 3 (the “U.S. Trustee”) appointed an official committee of unsecured creditors in the Debtors’ cases (the “Committee”). *See* ECF No. 231.

6. On December 1, 2022, the U.S. Trustee filed the *Motion of the United States Trustee for Entry of an Order Directing the Appointment of an Examiner*, ECF No. 176 (the “Examiner Motion”).

7. On February 21, 2023, the Court entered the *Order Denying Motion for the Appointment of an Examiner*, ECF No. 746 (the “Examiner Order”). On March 6, 2023, the U.S. Trustee filed a notice of appeal of the Examiner Order, ECF No. 805, and on January 19, 2024, the United States Court of Appeals for the Third Circuit (the “Third Circuit”) issued an opinion reversing the Examiner Order.

8. On February 23, 2024, the Court entered an order directing the U.S. Trustee to appoint an examiner in the Debtors’ cases, ECF No. 7909.

9. On February 27, 2024, the U.S. Trustee filed the *Notice of Appointment of Examiner*, ECF No. 8047, and the *(I) Application of the United States Trustee for Order Approving the Appointment of Robert J. Cleary, Esq. as Examiner; (II) Motion for Entry of an Order (A) Establishing the Scope, Cost, Degree, and Duration of the Initial Phase of the Examination and (B) Granting Relief; and (III) Motion to File Certain Information Regarding Potential Parties in Interest Under Seal*, ECF No. 8048.

10. The Court held a hearing on March 20, 2024. On March 20, 2024, the Court entered the *Order Approving the Appointment of Examiner*, ECF No. 9882 (the “Appointment Order”), which approved Mr. Cleary’s appointment as Examiner in these Chapter 11 Cases. On the Appointment Date, the Court also entered the Examination Scope Order which sets out the scope, cost, degree, and duration of the Examiner’s initial investigation, ECF No. 9883.

11. Paragraph 2 of the Examination Scope Order required the Examiner to complete his Examination and file his report within 60 days (the “Report Deadline”).² On May 20, 2024, the Examiner filed the *Report of Robert J. Cleary, Examiner*, ECF No. 15545 (the “Examiner Report”) under seal pursuant to paragraph 8 of the Examination Scope Order and the Examiner’s Motion to Amend Order, ECF No. 13627. On May 23, 2024, following entry of an Order Amending the Cost of the Examination and Permitting the Filing of Certain Information Regarding Potential Parties In Interest Under Seal (ECF No. 15538), the Examiner filed a fully unreacted version of the Examiner Report, ECF No. 15545.

RELIEF REQUESTED

12. Through this Motion, the Examiner seeks entry of an order substantially in the form attached hereto as Exhibit A (i) granting the Examiner authority to conduct additional investigations as outlined in the Examiner Report; (ii) establishing the scope, cost, degree and duration of these additional investigations, and (iii) granting such other and further relief as deemed just and proper, including with respect to the initial filing under seal of a Phase II Report (as defined below).

13. Bankruptcy Code section 1104(c) authorizes the Court to order the Examiner to conduct an investigation of the Debtors “as is appropriate.” The Third Circuit has made clear that this Court has broad discretion to determine the scope, duration, degree, and cost of this examination. *See In re FTX Trading Ltd.*, 91 F.4th 148, 156 (3d Cir. 2024).

14. Paragraph 2 of the Examination Scope Order states, “[i]n the event the Examiner recommends that additional investigations would be necessary or helpful to the Court or

² The Examination Scope Order was entered on March 20, 2024, and 60 days from March 20, 2024, was Sunday, May 19, 2024. As such, the Report Deadline was May 20, 2024. *See* Fed. R. Bankr. P. 9006(a)(1).

the Debtors' estates or that additional investigations would be in the public interest, the Examiner may seek authorization through the Examiner's report or by filing an application for authority to conduct such investigations (in either case on notice to parties in interest with an opportunity for parties in interest to be heard) setting out the proposed scope, duration, degree, and cost of, and rationale for, such additional investigations."

15. In the Examiner Report, the Examiner recommended that he be authorized to undertake additional investigations into three issues. (*See* Examiner Report, ECF No. 15545 at 41-45, 45-49, 176-183, 209).

16. The first recommendation concerns S&C's representation of Sam Bankman-Fried ("Bankman-Fried") in connection with his purchase of the Robinhood Shares. (*See* Examiner Report at pages 41 to 45). This inquiry would focus on (1) the scope and contours of that representation, and (2) based on that representation, what, if anything, S&C knew or should have known about the FTX Group's misconduct and/or fraud. Further investigation into this transaction would be important to help determine whether there was a potentially disqualifying conflict the Court should have been aware of when ruling on S&C's retention application. In addition, the investigation would discern more generally if, in connection with or as a consequence of this representation, S&C advised on, possessed or gained knowledge of, or had been made aware of critical facts relating to the FTX Group's misconduct.

17. The second recommendation concerns potential claims against the former shareholders of Ledger Holdings, Inc. ("LHI") that sold their interests prepetition to West Realm Shires Inc. ("WRS"), to the extent any claims were not released in the Debtors' Bankruptcy Court-approved postpetition sale of LHI to M 7 Holdings. (*See* Examiner Report at pages 45 to 49). This inquiry would (1) seek to determine whether an avoidance action(s) is warranted with

respect to unreleased shareholders, and (2) enable the Examiner to report on the underlying details of the prepetition sale of LHI to WRS, which report and findings would be in the public interest.

18. The third recommendation concerns the “holes” or balance sheet shortfalls at FTX.US. (See Examiner Report at pages 176 to 183). This inquiry would center on (1) the existence of and the reasons these holes arose at FTX.US, (2) whether the balance sheet holes were the result of commingling of customer or corporate assets, (3) the frequency and magnitude of the holes, and (4) how they were resolved and by whom. Further investigation of the existence, cause, and resolution of “holes,” or balance sheet shortfalls, at FTX.US may identify additional misconduct or misuse of customer assets. Additionally, further investigation and reporting on FTX.US’s insolvency could promote public confidence in the bankruptcy process by refuting Bankman-Fried’s false claims that FTX.US was solvent as of the Petition Date. Given the significant public interest in issues related to FTX.US it is the Examiner’s view that further inquiry by him into these issues is warranted.

19. The Examiner estimates the additional investigative work related to these issues would take approximately 10 weeks.

20. The Examiner estimates the cost of this proposed work, along with a Report to the Court summarizing the same (the “Phase II Report”), would not exceed \$ 3,000,000.³

21. The Examiner proposes to file a Phase II Report initially under seal. The process for parties to file a sealing motion would align with that of the initial investigation.

³ In the Examiner’s Report, we initially estimated that these investigations would be completed at a cost not to exceed \$2,400,000. However, upon further assessment of the steps necessary to conduct and complete these investigations thoroughly and accurately, we have adjusted this estimate.

Parties will be provided seven days to file a sealing motion, which the Court is authorized to approve pursuant to Local Rule 9018-1(d)(i).

22. Pursuant to the proposed process, the Examiner shall initially file the Phase II Report under seal on the deadline set by the Court (“Phase II Report Deadline”). At that time, unredacted copies will be provided or otherwise made available to the Debtors, the Committee, and the U.S. Trustee (the “Parties”) and the Court. The Parties and the Examiner will then have seven days to discuss and finalize proposed redactions to the Phase II Report that are necessary to protect privileged information.

23. To the extent the Parties do not seek to redact any portion of the Examiner’s Phase II Report, then the Examiner shall file a fully unredacted version of the Phase II Report so that it is publicly available on the docket on or before seven days from the Phase II Report Deadline. If the Parties do seek to redact portions of the Phase II Report, and no Party objects to the proposed privilege redactions, then on or before seven days from the Phase II Report Deadline, (i) the Examiner shall file the Phase II Report so that it is publicly available on the docket reflecting the agreed-upon redactions and (ii) the Parties shall file a sealing motion seeking approval of such redactions. If the Parties are unable to reach agreement on any proposed redactions by seven days from the Phase II Report Deadline, then seven days from the Phase II Report Deadline, (i) the Examiner shall file the Phase II Report so that it is publicly available on the docket reflecting agreed-upon redactions in addition to all disputed redactions and (ii) the Parties shall file a sealing motion or motions seeking Court approval of the agreed-upon redactions and Court resolution on the disputed redactions. The redactions shall remain under seal until the application is resolved. For the avoidance of doubt, the disclosure of the unredacted version of the Phase II Report to the Parties for purposes of identifying potential

privilege redactions shall neither constitute nor be deemed a waiver by any Party of, as applicable, work-product protection, attorney-client privilege, or any other applicable privilege or protection.

24. The proposed redactions shall be approved upon (i) the agreement of the Parties approved by Court order or (ii) a Court ruling, memorialized by a Court order as to what privileged material (if any) should be redacted from the Phase II Report. If the Court's order does not approve all of the redactions reflected in the Phase II Report filed seven days from the Phase II Report Deadline, then within three business days of entry of the Court's order, the Examiner shall file on the public docket a copy of the Phase II Report reflecting only the Court-approved redactions. The Examiner, the Debtors, and the Committee shall thereafter maintain the confidentiality of the unredacted version of the Phase II Report. The U.S. Trustee shall not disclose the redacted parts of the Phase II Report (if any) consistent with 11 U.S.C. §107(c).

NOTICE

25. Notice of this Motion will be given to (a) the U.S. Trustee; (b) the Debtors; (c) the Committee; (d) the ad hoc committee of non-U.S. customers of FTX.com; (e) the joint provisional liquidators of FTX Digital Markets Ltd.; and (f) all parties that have filed requests for notices in these Chapter 11 Cases. In light of the nature of the relief requested, the Examiner submits that no other or further notice need be provided.

PRIOR REQUEST

26. This Motion seeks to grant the Examiner authority to conduct additional investigations. Other than as set forth in the Examiner Report, no request for the relief sought herein has been made by the Examiner to this or any other court.

WHEREFORE the Examiner respectfully requests entry of the proposed order attached hereto as Exhibit A (i) granting the Examiner authority to conduct additional investigations as outlined in the Examiner Report; (ii) establishing the scope, cost, degree and duration of these additional investigations, and (iii) granting such other and further relief as deemed just and proper.

Dated: June 10, 2024

Respectfully submitted,

ASHBY & GEDDES, P.A.

By: /s/ Michael D. DeBaecke

Michael D. DeBaecke (Bar No. 3186)
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801
Tel: (302) 654-1888
Email: mdebaecke@ashbygeddes.com

-and-

**PATTERSON BELKNAP WEBB &
TYLER LLP**

Daniel A. Lowenthal (admitted *pro hac vice*)
Kimberly A. Black (admitted *pro hac vice*)
1133 Avenue of the Americas
New York, NY 10036-6710
Telephone: (212) 336-2000
Facsimile: (212) 336-2222
Email: dalowenthal@pbwt.com
Email: kblack@pbwt.com

*Counsel to Robert J. Cleary in his capacity
as Examiner appointed in the Chapter 11
Cases*

Exhibit A

(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: D.I. _____

**ORDER (I) GRANTING THE EXAMINER AUTHORITY TO CONDUCT
ADDITIONAL INVESTIGATIONS AND (II) ESTABLISHING THE SCOPE, COST,
DEGREE, AND DURATION OF THE SECOND PHASE OF THE EXAMINATION AND
GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the examiner Robert J. Cleary (the “Examiner”) for entry of an order (this “Order”) (a) granting the Examiner authority to conduct additional investigations and (b) establishing the scope, cost, degree, and duration of these additional investigations and granting related relief; this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. During the second phase of the examination (the “Phase II Examination”), the Examiner shall, no later than 70 days from the entry of this Order, file a report (the “Phase II Report”) which summarizes the additional investigations conducted by the Examiner (the “Investigations”).
3. The Investigations shall be comprised of the following issues:
 1. S&C’s representation of Sam Bankman-Fried (“Bankman-Fried”) in connection with his purchase of the Robinhood Shares. This inquiry should focus on (1) the scope and contours of that representation, and (2) based on that representation, what, if anything, S&C knew or should have known about the FTX Group’s misconduct and/or fraud.
 2. Potential claims against the former shareholders of Ledger Holdings, Inc. (“LHI”) that sold their interests prepetition to West Realm Shires Inc. (“WRS”), to the extent any such claims were not released in the Debtors’ Court-approved postpetition sale of LHI to M 7 Holdings. This inquiry should (1) determine whether an avoidance action(s) is warranted with respect to unreleased shareholders, and (2) enable the

Examiner to report on the underlying details of the prepetition sale of LHI to WRS.

3. The “holes” or balance sheet shortfalls at FTX.US. This inquiry should center on (1) the existence of and the reasons these holes arose at FTX.US, (2) whether the balance sheet holes were the result of commingling of customer or corporate assets, (3) the frequency and magnitude of the holes, and (4) how they were resolved and by whom.

4. Based on the assumption that there will be no impediments to or delays in the Examiner gaining access to all relevant information, the cost of the Phase II Examination shall not exceed \$ 3,000,000 for the fees and expenses of the Examiner and professionals retained by the Examiner. This is without prejudice to the Examiner’s right to seek an increase of the budget for cause shown, after notice and an opportunity for parties in interest to be heard. The fees and the expenses of the Examiner and any professionals retained by the Examiner shall be subject to 11 U.S.C. § 330.

5. The Phase II Report shall be filed no later than 70 days from entry of this Order.

6. The Phase II Report shall initially be filed under seal in its entirety. The unredacted Phase II Report shall be provided or otherwise made available to the Court, counsel to the Debtors, counsel to the Committee, and counsel to the U.S. Trustee. The foregoing parties shall receive the unredacted Report solely for the purpose of allowing the Examiner, the Debtors, the Committee, and the U.S. Trustee (each a “Party” and collectively the “Parties”) to discuss any potential redactions necessary to protect privileged information.

7. To the extent the Parties do not seek to redact any portion of the Examiner's Phase II Report, then the Examiner shall file a fully unredacted version of the Phase II Report so that it is publicly available on the docket on or before 77 days from the entry of this Order. If the Parties do seek to redact portions of the Phase II Report, and no Party objects to the proposed privilege redactions, then on or before 77 days from the entry of this Order, (i) the Examiner shall file the Phase II Report so that it is publicly available on the docket reflecting the agreed-upon redactions and (ii) the Parties shall file a sealing motion seeking approval of such redactions. If the Parties are unable to reach agreement on any proposed redactions by 77 days from the entry of this Order, then 77 days from the entry of this Order, (i) the Examiner shall file the Phase II Report so that it is publicly available on the docket reflecting agreed-upon redactions in addition to all disputed redactions and (ii) the Parties shall file a sealing motion or motions seeking Court approval of the agreed-upon redactions and Court resolution on the disputed redactions. The redactions shall remain under seal until the application is resolved. For the avoidance of doubt, the disclosure of the unredacted version of the Phase II Report to the Parties for purposes of identifying potential privilege redactions shall neither constitute nor be deemed a waiver by any Party of, as applicable, work-product protection, attorney-client privilege, or any other applicable privilege or protection.

8. The proposed redactions shall be approved upon (i) the agreement of the Parties approved by Court order or (ii) a Court ruling, memorialized by a Court order as to what privileged material (if any) should be redacted from the Phase II Report. If the Court's order does not approve all of the redactions reflected in the Phase II Report filed 77 days from the entry of this Order, then within three business days of entry of the Court's order, the Examiner shall file on the public docket a copy of the Phase II Report reflecting only the Court-approved

redactions. The Examiner, the Debtors, and the Committee shall thereafter maintain the confidentiality of the unredacted version of the Phase II Report. The U.S. Trustee shall not disclose the redacted parts of the Phase II Report (if any) consistent with 11 U.S.C. §107(c).

9. Subject to the provisions herein, Paragraphs 6 through 12 of the *Order (I) (A) Establishing the Scope, Cost, Degree, and Duration of the Examination and (B) Granting Related Relief; and (II) Permitting the Filing of Certain Information Regarding Potential Parties in Interest Under Seal*, ECF No. 9883 (the “Examination Scope Order”) remain in full force and effect for the Phase II Examination.

10. This Order is without prejudice to the right of any party in interest to seek relief from the Court, including modification of the scope of the Phase II Examination. This Order is also without prejudice to the Examiner’s right to seek other relief as he may otherwise deem appropriate in furtherance of the discharge of his duties and in connection with the Phase II Examination.

11. The Examiner may take all actions necessary to effectuate the relief granted by this Order.

12. This Order shall be effective and enforceable immediately upon entry.

13. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Bankruptcy Judge for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received on or before June 24, 2024, at 5:00 p.m. (Eastern Time).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 10, 2024

Respectfully submitted,

ASHBY & GEDDES, P.A.

By: /s/ Michael D. DeBaecke

Michael D. DeBaecke (Bar No. 3186)
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801
Tel: (302) 654-1888
Email: mdebaecke@ashbygeddes.com

-and-

**PATTERSON BELKNAP WEBB &
TYLER LLP**

Daniel A. Lowenthal (admitted *pro hac vice*)
Kimberly A. Black (admitted *pro hac vice*)
1133 Avenue of the Americas
New York, NY 10036-6710
Telephone: (212) 336-2000
Facsimile: (212) 336-2222
Email: dalowenthal@pbwt.com
Email: kblack@pbwt.com

*Counsel to Robert J. Cleary in his capacity
as Examiner appointed in the Chapter 11
Cases*

CERTIFICATE OF SERVICE

I, Michael D. DeBaecke, hereby certify that on June 10, 2024, I caused one copy of the *Examiner's Motion For (I) Authority to Conduct Additional Investigations and (II) An Order Establishing the Scope, Cost, Degree, and Duration of the Second Phase of the Examination and Granting Related Relief* to be served upon (i) all parties of record via CM/ECF; and (ii) the parties on the attached service list via electronic mail, unless otherwise indicated.

Dated: June 10, 2024

/s/ Michael D. DeBaecke

Michael D. DeBaecke (Bar No. 3186)

VIA INTERNATIONAL MAIL

FTX TRADING LTD.
ATTN: PRESIDENT OR GENERAL COUNSEL
10-11 MANDOLIN PLACE
FRIARS HruppenLL ROAD
ST. JOHN'S AG-04
ANTIGUA AND BARBUDA

VIA FIRST CLASS MAIL

ENVIRONMENTAL PROTECTION AGENCY - REGION 2
ATTN BANKRUPTCY DIVISION
290 BROADWAY
NEW YORK NY 10007-186

VIA FIRST CLASS MAIL

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATION
2970 MAR
MAIL STOP 5-Q30.133
PHILADELPHIA PA 19104-5016

VIA FIRST CLASS MAIL

UNITED STATES OF AMERICA ATTORNEY GENERAL
ATTN: BANKRUPTCY DEPT
US DEPT OF JUSTICE
950 PENNSYLVANIA AVE NW
WASHINGTON DC 20530-0001

BROWN RUDNICK LLP
ATTN: KENNETH J. AULET, JEFFREY L. JONAS, MICHAEL
WINOGRAD, ALEXANDER F. KASNETZ
SEVEN TIMES SQUARE
NEW YORK NY 10036
KAULET@BROWNRUDNICK.COM;
JJONAS@BROWNRUDNICK.COM;
MWINOGRAD@BROWNRUDNICK.COM;
AKASNETZ@BROWNRUDNICK.COM

BALLARD SPAHR LLP
ATTN: JAMES V. MASELLA, III
1675 BROADWAY, 19TH FLOOR
NEW YORK NY 10019-5820
MASELLAJ@BALLARDSPAHR.COM

BLANK ROME LLP
ATTN: RICK ANTONOFF
1271 AVENUE OF THE AMERICAS
NEW YORK NY 10020
RICK.ANTONOFF@BLANKROME.COM

VIA FIRST CLASS MAIL

BECKET & LEE LLP
ATTN: SHRADDHA BHARATIA
P.O. BOX 3001
MALVERN PA 19355-0701

VIA FIRST CLASS MAIL

ENVIRONMENTAL PROTECTION AGENCY
ATTN: GENERAL COUNSEL
OFFICE OF GENERAL COUNSEL
1200 PENNSYLVANIA AVE NW, 2310A
WASHINGTON DC 20460

VIA FIRST CLASS MAIL

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATION
P.O. BOX 7346
PHILADELPHIA PA 19101-7346

BOERSCH & ILLOVSKY LLP
ATTN: SHARON FRASE
1611 TELEGRAPH AVE., SUITE 806
OAKLAND CA 94612
SHARON@BOERSCH-ILLOVSKY.COM

BROWN RUDNICK LLP
ATTN: T. AXELROD, S. DWOSKIN, M. SAWYER
ONE FINANCIAL CENTER
BOSTON MA 02111
TAXELROD@BROWNRUDNICK.COM;
SDWOSKIN@BROWNRUDNICK.COM;
MSAWYER@BROWNRUDNICK.COM

BUTLER SNOW LLP
ATTN: J. BAILEY III, R. CAMPBELL HILLYER
CRESCENT CENTER, SUITE 500
6075 POPLAR AVENUE, P.O. BOX 171443
MEMPHIS TN 38187
JEB.BAILEY@BUTLERSNOW.COM;
CAM.HILLYER@BUTLERSNOW.COM

CARR MALONEY P.C.
ATTN: J. PETER GLAWS, IV, ESQ.
2000 PENNSYLVANIA AVE, NW
STE. 8001
WASHINGTON DC 20006
PETER.GLAWS@CARRMALONEY.COM

COINCIDENT CAPITAL INTERNATIONAL, LTD
C/O SUNIL SHAH
1805 N. CARSON CITY ST., SUITE X-108
CARSON CITY NV 89701
FTXCC@COINCIDENTCAPITAL.COM

COOLEY LLP
ATTN: AUDREY MOTT-SMITH
3 EMBARCADERO CENTER, 20TH FLOOR
SAN FRANCISCO CA 94111
AMOTTSMITH@COOLEY.COM

COOLEY LLP
ATTN: PHILIP M. BOWMAN, ESQ.
55 HUDSON YARDS
NEW YORK NY 10001
PBOWMAN@COOLEY.COM

COZEN O'CONNOR
ATTN: FREDERICK SCHMIDT
3WTC, 175 GREENWICH STREET
55TH FLOOR
NEW YORK NY 10007
ESCHMIDT@COZEN.COM

DLA PIPER LLP (US)
ATTN: DENNIS C. O'DONNELL
1251 AVENUE OF THE AMERICAS
NEW YORK NY 10020
DENNIS.ODONNELL@DLAPIPER.COM

DLA PIPER LLP (US)
ATTN: JEFFREY TOROSIAN
444 W. LAKE ST., SUITE 900
CHICAGO IL 60606
JEFFREY.TOROSIAN@DLAPIPER.COM

CHAMBERLAINS LAW FIRM
ATTN: S. VULETA, L. MCBRIDE, S. BRODOWSKI, S. ASGILL
LEVEL 12 59 GOULBURN STREET
SYDNEY, NSW 2002
AUSTRALIA
STIPE.VULETA@CHAMBERLAINS.COM.AU;
LACHLAN.MCBRIDE@CHAMBERLAINS.COM.AU;
SEBASTIAN.BRODOWSKI@CHAMBERLAINS.COM.AU;
SAM.KEYSASGILL@CHAMBERLAINS.COM.AU

CLARK HILL PLC
ATTN: KEVIN H. MORSE
130 E. RANDOLPH STREET, SUITE 3900
CHICAGO IL 60601
KMORSE@CLARKHILL.COM

DELAWARE DIVISION OF REVENUE
ATTN: ZILLAH FRAMPTON
820 N FRENCH ST WILMINGTON DE 19801
FASNOTIFY@STATE.DE.US

DELAWARE STATE TREASURY
ATTN: BANKRUPTCY DEPT
820 SILVER LAKE BLVD, STE 100
DOVER DE 19904
STATETREASURER@STATE.DE.US

CROWELL & MORING LLP
ATTN: FREDERICK HYMAN
590 MADISON AVE
NEW YORK NY 10022
FHYMAN@CROWELL.COM

DEBEVOISE & PLIMPTON LLP
ATTN: M. N. LABOVITZ, E. WORENKLEIN, M. GODBE
66 HUDSON BOULEVARD
NEW YORK NY 10001
NLABOVITZ@DEBEVOISE.COM;
EWORENKLEIN@DEBEVOISE.COM;
MCGODBE@DEBEVOISE.COM

DEBEVOISE & PLIMPTON LLP
ATTN: SIDNEY P. LEVINSON, JASMINE BALL
66 HUDSON BOULEBARD
NEW YORK NY 10001
SLEVINSON@DEBEVOISE.COM;
JBALL@DEBEVOISE.COM

EVERSHEDS SUTHERLAND (US) LLP
ATTN: ANDREA L. GORDON
700 SIXTH STREET NW, SUITE 700
WASHINGTON DC 20001
ANDREAGORDON@EVERSHEDS-SUTHERLAND.COM

EVERSHEDS SUTHERLAND (US) LLP
ATTN: ERIN E. BRODERICK
227 WEST MONROE STREET, SUITE 6000
CHICAGO IL 60606
ERINBRODERICK@EVERSHEDS-SUTHERLAND.COM

EVERSHEDS SUTHERLAND (US) LLP
ATTN: MARK D. SHERRILL
1001 FANNIN STREET, SUITE 3700
HOUSTON TX 77002
MARKSHERRILL@EVERSHEDS-SUTHERLAND.COM

EVERSHEDS SUTHERLAND (US) LLP
ATTN: P. IVANICK, S. PAUL, P. EHRLICH, L. HOLBERT
THE GRACE BUILDING, 40TH FLOOR
1114 AVENUE OF THE AMERICAS
NEW YORK NY 10036
PETERIVANICK@EVERSHEDS-SUTHERLAND.COM;
SARAHPAUL@EVERSHEDS-SUTHERLAND.COM;
PHILIPHEHLICH@EVERSHEDS-SUTHERLAND.COM;
LYNNHOLBERT@EVERSHEDS-SUTHERLAND.COM

FOLEY & LARDNER LLP
ATTN: BRENDA JONES
90 PARK AVENUE
NEW YORK NY 10016
BMJONES@FOLEY.COM

GOETZ FITZPATRICK LLP
ATTN: SCOTT D. SIMON, ESQ.
ONE PENN PLAZA , SUITE 3100
NEW YORK NY 10119
SSIMON@GOETZFITZ.COM

GREENBERG GLUSKER FIELDS CLAMAN &
MACHTINGER LLP
ATTN: BRIAN DAVIDOFF
2049 CENTURY PARK EAST, STE 2600
LOS ANGELES CA 90067-4590
BDAVIDOFF@GREENBERGGLUSKER.COM

HAYNES AND BOONE, LLP
ATTN: RICHARD D. ANIGIAN, CHARLES M. JONES II
2323 VICTORY AVENUE, SUITE 700
DALLAS TX 75219
RICK.ANIGIAN@HAYNESBOONE.COM
CHARLIE.JONES@HAYNESBOONE.COM

HOGAN LOVELLS US LLP
ATTN: D. TRACEY, III, J. BECK, M. JUMPER
390 MADISON AVENUE
NEW YORK NY 10017
DENNIS.TRACEY@HOGANLOVELLS.COM;
JOHN.BECK@HOGANLOVELLS.COM;
MAYA.JUMPER@HOGANLOVELLS.COM

HOLLAND & KNIGHT LLP
W. GLUCK, M. LARSEN, D. WIRT, J. MAGEE, S. DESAI
31 W. 52ND STREET
NEW YORK NY 10019
WARREN.GLUCK@HKLAW.COM;
MARIE.LARSEN@HKLAW.COM;
DAVID.WIRT@HKLAW.COM;
JESSICA.MAGEE@HKLAW.COM;
SHARDUL.DESAI@HKLAW.COM

HUGH SMITH ESQUIRE
LEVEL 8 224 BUNDA STREET
CANBERRA CITY, ACT 2601
AUSTRALIA
HUGH.SMITH@CHAMBERLAINS.COM.AU

K&L GATES LLP
ATTN: BRIAN D. KOOSSED, ESQ.
1602 K STREET NW
WASHINGTON DC 20006-1600
BRIAN.KOOSSED@KLGATES.COM

KELLY HART & HALLMAN LLP
ATTN: MICHAEL D. ANDERSON
201 MAIN STREET, SUITE 2500
FORT WORTH TX 76102
MICHAEL.ANDERSON@KELLYHART.COM

KROLL RESTRUCTURING ADMINISTRATION LLC
ATTN: SELWYN PERRY
55 EAST 52ND STREET
17TH FLOOR
NEW YORK NY 10055
SERVICEQA@RA.KROLL.COM;
FTXTEAM@RA.KROLL.COM

LANDIS RATH & COBB LLP
ATTN: MATTHEW R. PIERCE, NICOLAS E. JENNER,
GEORGE A. WILLIAMS III
919 MARKET STREET, SUITE 1800
WILMINGTON DE 19801
PIERCE@LRCLAW.COM; JENNER@LRCLAW.COM;
WILLIAMS@LRCLAW.COM

ATTN: JEFFREY S. PRICE, MELISSA J. LEE, SCOTT C.
WILLIAMS
1201 DEMONBREUN STREET, SUITE 900
NASHVILLE TN 37213
JPRICE@MANIERHEROD.COM;
MLEE@MANIERHEROD.COM;
SWILLIAMS@MANIERHEROD.COM

MASSACHUSETTS DEPARTMENT OF REVENUE
ATTN: CELINE E. DE LA FOSCADE-CONDON
100 CAMBRIDGE STREET, P.O. BOX 9565
BOSTON MA 02114
DELAFOCASC@DOR.STATE.MA.US

VIA FIRST CLASS MAIL

MCCARTER & ENGLISH LLP
ATTN: DAVID ADLER ESQ.
WORLDWIDE PLAZA
825 EIGHTH AVE., 31ST FLOOR
NEW YORK NY 10019

MCCARTER & ENGLISH LLP
ATTN: PHILLIP S. PAVLICK
FOUR GATEWAY CENTER
100 MULBERY STREET
NEWARK NJ 07102
PPAVLICK@MCCARTER.COM

MCDERMOTT WILL & EMERY LLP
ATTN: DARREN AZMAN, JOHN J. CALANDRA
JOSEPH B. EVANS, ELIZABETH RODD
ONE VANDERBILT AVENUE
NEW YORK NY 10017-3852
DAZMAN@MWE.COM; JCALANDRA@MWE.COM;
JBEVANS@MWE.COM; ERODD@MWE.COM

MCELROY, DEUTSCH, MULVANEY & CARPENTER,
LLP
ATTN: JEFFREY BERNSTEIN
570 BROAD STREET, SUITE 1401
NEWARK NJ 07102
JBERNSTEIN@MDMC-LAW.COM

MCELROY, DEUTSCH, MULVANEY & CARPENTER,
LLP
ATTN: MICHAEL R. MORANO, ESQ.
1300 MT. KEMBLE AVENUE
P.O. BOX 2075
MORRISTOWN NJ 07962
MMORANO@MDMC-LAW.COM

MIAMI-DADE OFFICE OF THE TAX COLLECTOR
BANKRUPTCY UNIT
200 NW 2ND AVENUE, #430
MIAMI FL 33128
PRISCILLA.WINDLEY@MIAMIDADE.GOV;
MDTCBKC@MIAMIDADE.GOV

MORGAN, & BOCKIUS LLP
ATTN: JOHN C. GOODCHILD III; MATTHEW C.
ZIEGLER
1701 MARKET STREET
PHILADELPHIA PA 19103
JOHN.GOODCHILD@MORGANLEWIS.COM;
MATTHEW.ZIEGLER@MORGANLEWIS.COM

MORRIS JAMES LLP
ATTN: SARAH M. ENNIS, TARA C. PAKROUTH
500 DELAWARE AVENUE, SUITE 1500
WILMINGTON DE 19801
SENNIS@MORRISJAMES.COM;
TPAKROUH@MORRISJAMES.COM

MORRISON COHEN LLP
ATTN: JASON P. GOTTLIEB
909 THIRD AVENUE, 27TH FLOOR
NEW YORK NY 10022
JGOTTLIEB@MORRISONCOHEN.COM

OCTOPUS INFORMATION LTD
ATTN: LINFENG DONG, OMC CHAMBERS
WICKHAMS CAY 1
ROAD TOWN, TORTOLA
BRITISH VIRGIN ISLANDS
OCTOPUS_FTX@TEAMB.CN

PACHULSKI STANG ZIEHL & JONES LLP
ATTN: TEDDY M. KAPUR, JASON H. ROSELL
919 N. MARKET STREET, 17TH FLOOR
WILMINGTON DE 19801
TKAPUR@PSZJLAW.COM; JROSELL@PSZJLAW.COM

PAUL HASTINGS
ATTN: KRISTOPHER M. HANSEN, KENNETH
PASQUALE, EREZ E. GILAD
200 PARK AVENUE
NEW YORK NY 10166
KRISHANSEN@PAULHASTINGS.COM;
KENPASQUALE@PAULHASTINGS.COM;
EREZGILAD@PAULHASTINGS.COM

MORGAN, LEWIS & BOCKIUS LLP
ATTN: JOSHUA DORCHAK; DAVID K. SHIM
101 PARK AVENUE
NEW YORK NY 10178
JOSHUA.DORCHAK@MORGANLEWIS.COM;
DAVID.SHIM@MORGANLEWIS.COM

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
ATTN: DONNA L. CULVER
1201 NORTH MARKET STREET, 16TH FLOOR
P.O. BOX 1347
WILMINGTON DE 19899-1347
DCULVER@MORRISNICHOLS.COM

VIA FIRST CLASS MAIL
NATIONAL ASSOCIATION OF ATTORNEYS GENERAL
ATTN: KAREN CORDRY
1850 M ST., NW 12TH FLOOR
WASHINGTON DC 20036

OFFICE OF THE ATTORNEY GENERAL OF
WASHINGTON
ATTN: STEPHEN MANNING
P. O. BOX 40100
OLYMPIA WA 98504-4010
STEPHEN.MANNING@ATG.WA.GOV

PACHULSKI STANG ZIEHL & JONES LLP
ATTN: MARY F. CALOWAY
ONE SANSOME STREET, SUITE 3430
SAN FRANCISCO CA 94104
MCALOWAY@PSZJLAW.COM

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
ATTN: KENNETH S. ZIMAN
1285 AVENUE OF THE AMERICAS
NEW YORK NY 10019-6064
KZIMAN@PAULWEISS.COM

COUNSEL TO EMBED SHAREHOLDER DEFENDANTS
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
ATTN: RANDALL S. LUSKEY
535 MISSION STREET, 24TH FLOOR
SAN FRANCISCO CA 94105
RLUSKEY@PAULWEISS.COM

PROSKAUER ROSE LLP
ATTN: BRIAN S. ROSEN, DYLAN J. MARKER
ELEVEN TIMES SQUARE
NEW YORK NY 10036-8299
BROSEN@PROSKAUER.COM;
DMARKER@PROSKAUER.COM

PROVISIONAL LIQUIDATOR OF FTX DIGITAL MARKETS LTD.
ATTN: BRIAN SIMMS, K.C., KEVIN CAMBRIDGE, PETER GREAVES
3 BAYSIDE EXECUTIVE PARK
WEST BAY STREET & BLAKE ROAD
PO BOX N-4875
NASSAU
THE BAHAMAS
BSIMMS@LENNOXPATON.COM; KEVIN.CAMBRIDGE@PWC.COM;
PETER.GREAVES@HK.PWC.COM

PULSAR GLOBAL LTD
ATTN: MICHELE WAN AND JACKY YIP
UNIT 903-905, K11 ATELIER VICTORIA DOCKSIDE
18 SALISBURY ROAD
KOWLOON
HONG KONG
MICHELE.WAN@PULSAR.COM; JACKY.YIP@PULSAR.COM

REED SMITH LLP
ATTN: AARON JAVIAN
599 LEXINGTON AVENUE
NEW YORK NY 10022
AJAVIAN@REEDSMITH.COM

RIMON, P.C.
ATTN: FREDERICK CHANG
506 2ND AVE., SUITE 1400
SEATTLE WA 98104
FREDERICK.CHANG@RIMONLAW.COM

RIMON, P.C.
ATTN: JACQUELYN H. CHOI
2029 CENTURY PARK EAST, SUITE 400N
LOS ANGELES CA 90067
JACQUELYN.CHOI@RIMONLAW.COM

SCHULTE ROTH & ZABEL LLP
ATTN: DOUGLAS S. MINTZ
555 13TH STREET, NW, SUITE 6W
WASHINGTON DC 20004
DOUGLAS.MINTZ@SRZ.COM

SCHULTE ROTH & ZABEL LLP
ATTN: REUBEN E. DIZENGOFF
919 THIRD AVENUE
NEW YORK NY 10022
REUBEN.DIZENGOFF@SRZ.COM

SECURITIES & EXCHANGE COMMISSION
SECRETARY OF THE TREASURY
100 F. STREET NE
WASHINGTON DC 20549
SECBANKRUPTCY@SEC.GOV

SECURITIES & EXCHANGE COMMISSION - NY OFFICE
ATTN: BANKRUPTCY DEPT
BROOKFIELD PLACE
200 VESEY STREET, STE 400
NEW YORK NY 10281-1022
BANKRUPTCYNOTICESCHR@SEC.GOV;
NYROBANKRUPTCY@SEC.GOV

SECURITIES & EXCHANGE COMMISSION -
PHILADELPHIA OFFICE
ATTN: BANKRUPTCY DEPT
ONE PENN CENTER
1617 JFK BLVD, STE 520
PHILADELPHIA PA 19103
SECBANKRUPTCY@SEC.GOV

STATE OF DELAWARE ATTORNEY GENERAL
ATTN: BANKRUPTCY DEPT
CARVEL STATE OFFICE BLDG.
820 N. FRENCH ST.
WILMINGTON DE 19801
ATTORNEY.GENERAL@STATE.DE.US

STRADLEY RONON STEVENS & YOUNG, LLP
ATTN: DEBORAH A. REPEROWITZ
100 PARK AVENUE, SUITE 2000
NEW YORK NY 10017
DREPEROWITZ@STRADLEY.COM

SULLIVAN & CROMWELL LLP
ATTN: JAMES L. BROMLEY, STEPHEN EHRENBERG,
125 BROAD STREET
NEW YORK NY 10004
BROMLEYJ@SULLCROM.COM;
EHRENBERGS@SULLCROM.COM

THE DALEY LAW FIRM
ATTN: DARRELL DALEY, SAMANTHA NEAL
4845 PEARL EAST CIRCLE, SUITE 101
BOULDER CO 80301
DARRELL@DALEYLAWYERS.COM;
SAMANTHA@DALEYLAWYERS.COM

THE SECURITIES COMMISSION OF THE BAHAMAS
ATTN: PRESIDENT OR GENERAL COUNSEL
POINCIANA HOUSE, NORTH BUILDING, 2ND FLOOR
31A
EAST BAY STREET, P.O. BOX N-8347
NASSAU
THE BAHAMAS
INFO@SCB.GOV.BS

U.S. DEPARTMENT OF JUSTICE
ATTN: SETH B. SHAPIRO
CIVIL DIVISION
1100 L STREET, NW, ROOM 7208
WASHINGTON DC 20005
SETH.SHAPIRO@USDOJ.GOV

U.S. DEPARTMENT OF JUSTICE
ATTN: WARD W. BENSON
P.O. BOX 227, BEN FRANKLIN STATION
WASHINGTON DC 20044
WARD.W.BENSON@USDOJ.GOV

US ATTORNEY FOR THE DISTRICT OF DELAWARE
ATTN: DAVID C. WEISS C/O ELLEN SLIGHTS
1007 ORANGE ST STE 700
P.O. BOX 2046
WILMINGTON DE 19899-2046
USADE.ECFBANKRUPTCY@USDOJ.GOV

VENABLE LLP
ATTN: ANDREW J. CURRIE
600 MASSACHUSETTS AVENUE, NW
WASHINGTON DC 20001
AJCURRIE@VENABLE.COM

VENABLE LLP
ATTN: XOCHITL S. STROHBEHN, CAROL A. WEINER,
ARIE A. PELED
1270 AVENUE OF THE AMERICAS, 24TH FLOOR
NEW YORK NY 10020
XSSSTROHBEHN@VENABLE.COM;
CWEINERLEVY@VENABLE.COM;
AAPELED@VENABLE.COM

WHITE & CASE LLP
ATTN: BRIAN D. PFEIFFER, BRETT BAKEMEYER
1221 AVENUE OF THE AMERICAS
NEW YORK NY 10020-1095
BRIAN.PFEIFFER@WHITECASE.COM;
BRETT.BAKEMEYER@WHITECASE.COM

WILMER CUTLER PICKERING HALE AND DORR LLP
ATTN: PETER G. NEIMAN, NICHOLAS WERLE
7 WORLD TRADE CENTER
150 GREENWICH STREET
NEW YORK NY 10007
PETER.NEIMAN@WILMERHALE.COM;
NICK.WERLE@WILMERHALE.COM

WINCENT INVESTMENT FUND PCC LTD
ATTN: CHARLES MELVIN, C/O WINCENT CAPITAL
MANAGEMENT
OLD POLICE STATION 120B
IRISH TOWN GX11 1AA
GIBRALTAR
LEGAL@WINCENT.CO

WINTERMUTE ASIA PTE. LTD
ATTN: LEGAL DEPARTMENT
24 EAN KIAM PLACE
429115
SINGAPORE
LEGAL@WINTERMUTE.COM

ZACHARY BRUCH
ATTN: PETER S. PARTEE, SR
HUNTON ANDREWS KURTH LLP
200 PARK AVE
NEW YORK NY 10166
PPARTEE@HUNTONAK.COM

David L. Finger (ID #2556)
FINGER & SLANINA, LLC
One Commerce Center
1201 N. Orange St., 7th fl.
Wilmington, DE 19801
dfinger@delawgroup.com

Katie Townsend
Adam Marshall
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th Street NW, Suite 1020
Washington, DC 20005
ktownsend@rcfp.org; amarshall@rcfp.org