

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS INC.,  
BRADLEY GARLINGHOUSE,  
and CHRISTIAN A. LARSEN,

Defendants.

No. 20-cv-10832 (AT)

**NOTICE OF MOTION TO OBTAIN INTERNATIONAL DISCOVERY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all prior proceedings in this case, Defendants Bradley Garlinghouse and Christian A. Larsen will move this Court to issue under its seal and signature the attached Letters of Request (Exhibits 2 through 17 to the enclosed Memorandum of Law) on behalf of Mr. Garlinghouse and Mr. Larsen to obtain documents from the following foreign third parties:

iFinex Inc. d/b/a Bitfinex  
c/o SHRM Trustees (BVI) Limited  
Trinity Chambers, PO Box 4301  
VG1110, Road Town, Tortola  
British Virgin Islands

Noah Trade Ltd. d/b/a Bitforex  
Room 1502-U4 Easey Commercial Building  
253-261 Hennessy Road  
Wan Chai  
Hong Kong, China

BGH One Ltd. d/b/a Bithumb  
15~16F, 124, Teheran-ro, Gangnam-gu  
Seoul  
Republic of Korea

Bitlish Ltd.  
14056, 43 Bedford Street  
London WC2E 9HA  
United Kingdom

GBM Foundation Company, Ltd. d/b/a BitMart  
c/o Stuarts Corporate Services Ltd  
4<sup>th</sup> Flr Cayman Financial Center 36A Dr Roy's Drive  
George Town, Grand Cayman, KY1-1104  
Cayman Islands

BMXDM Technology PTE. Ltd. d/b/a AscendEX (formerly Bitmax)  
10 Marina Boulevard #39  
Marina Bay Financial Centre  
Singapore, 018983

Bitrue Singapore PTE. Ltd.  
73 Upper Paya Lebar Road, #06-01C  
Centro Bianco  
Singapore, 534818

Bitstamp Ltd.  
5 New Street Square  
London EC4A 3TW  
United Kingdom

Coinbene Limited Vanuatu  
The Adelphi  
1 Coleman Street,  
Singapore, 179803

Coinone Co., Ltd.  
4th floor, 69 Hangang-daero,  
Yongsan-gu,  
Seoul  
South Korea

Hit Tech Solutions Development Ltd. d/b/a HitBTC  
Suite 15, Oliaji Trade Centre, Francis Rachel Street  
Victoria  
Mahé  
Seychelles

Huobi Global Limited  
Room 1404-05, Nan Fung Tower  
88 Connaught Road Central  
Hong Kong, China

Korbit, Inc.  
5F 376 Gangnam-daero Gangnam-gu  
Seoul, 06232  
South Korea

Aux Cayes FinTech Co. Ltd. d/b/a OKEx  
30, Kenilworth, Flat 4  
Sir Augustus Bartolo Street  
Ta'xbiex  
Malta

Upbit Singapore Pte. Ltd.  
1 Harbourfront Avenue #16-02  
Keppel Bay Tower  
Singapore, S098632

ZB Network Technology PTE. Ltd.  
1 North Bridge Road, #06-18  
High Street Centre  
Singapore, 179094

For the reasons set forth in the attached supporting Memorandum of Law, Mr. Garlinghouse and Mr. Larsen respectfully request that the Court issue the attached Letters of Request for International Assistance pursuant to 28 U.S.C. § 1781(b)(2) compelling the above-listed entities to produce documents so that the Mr. Garlinghouse and Mr. Larsen can receive evidence before the close of fact discovery.

We understand that the Plaintiff the Securities and Exchange Commission does not object to this motion.

Dated: June 10, 2021

Respectfully submitted,

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