



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

December 10, 2021

By ECF

Hon. Analisa Torres
U.S. District Court
Southern District of New York

Re: *SEC v. Ripple Labs, Inc.*, No. 20-cv-10832 (AT) (SN)

Dear Judge Torres:

Pursuant to Rule 29(b) of the Federal Rules of Civil Procedure and Rule I(C) of this Court's Individual Practices, Plaintiff Securities and Exchange Commission and Defendants Ripple Labs, Inc., Bradley Garlinghouse, and Christian A. Larsen jointly and respectfully request that the Court permit the parties to conduct one expert deposition on January 19, 2022, three business days after the existing close of expert discovery.

Expert discovery is currently scheduled to close on January 14, 2022. (D.E. 396). As part of that discovery, the parties have disclosed a total of 16 expert witnesses. Depositions for 15 of those 16 experts have been either completed or scheduled to occur by January 14. However, due to conflicts in the schedules of various experts and of the counsel responsible for those depositions, the parties request leave to take one final expert deposition by agreement on January 19. If granted, the requested relief would not impact any other deadline in this case.

For these reasons, the parties respectfully request that the Court grant their request to conduct an expert deposition on January 19, 2022, for good cause shown. The parties have submitted as Exhibit A hereto a Proposed Order reflecting this joint request.

Respectfully submitted,

_____/s/_____

Mark R. Sylvester
*Counsel for Plaintiff Securities and Exchange
Commission*

_____/s/_____

Andrew Ceresney
Counsel for Defendant Ripple Labs, Inc.

_____/s/_____

Matthew Solomon

Counsel for Defendant Bradley Garlinghouse

_____/s/_____
Martin Flumenbaum
Counsel for Defendant Christian A. Larsen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

Case No. 20-CV-10832 (AT)

**[PROPOSED] ORDER GRANTING THE PARTIES' JOINT MOTION
TO EXTEND THE DEADLINES FOR COMPLETING EXPERT DEPOSITIONS**

By agreement, Plaintiff Securities and Exchange Commission, and Defendants

Ripple Labs, Inc., Bradley Garlinghouse, and Christian A. Larsen jointly request that the Court briefly extend the deadline for completing expert depositions in this case, and have shown good cause for doing so.

IT IS HEREBY ORDERED THAT: The expert discovery schedule reflected in the Court's October 20, 2021 Order (D.E. 396) is modified solely to allow the parties to conduct a single expert deposition after January 14, 2022, with such deposition to occur on January 19, 2022.

Dated: _____, 2021

By: _____
Honorable Analisa Torres
United States District Judge