



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

January 12, 2022

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 extend the close of expert discovery to February 28, 2022.

Expert discovery is currently scheduled to close on January 14, 2022 (D.E. 396), with the exception of one deposition to be taken on January 19, 2022 (D.E. 407). The parties have disclosed a total of 16 expert witnesses. Depositions for 8 of those 16 experts will have been completed by this week. However, due to the spike in COVID infections, particularly in New York City, related travel difficulties, and unanticipated personal matters for certain expert witnesses, the parties request leave to postpone the remaining expert depositions to February. The parties have agreed that the remaining expert depositions will take place in February regardless of the state of COVID. 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 extend expert discovery to February 28, 2022, for good cause shown. The parties have submitted as Exhibit A hereto a Proposed Order reflecting this joint request.

Respectfully submitted,

/s/

Benjamin J. Hanauer
*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) (SN)

**[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 extend the deadline for completing expert depositions in this case, and have shown good cause for doing so.

IT IS HEREBY ORDERED THAT: The close of expert discovery reflected in the Court's October 20, 2021 and December 13, 2021 Orders (D.E. 396, 407) is extended to February 28, 2022.

Dated: _____, 2022

By: _____

Honorable Analisa Torres
United States District Judge