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VIA ECF

Hon. Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

***SEC v. Ripple Labs Inc., et al.*, No. 20-cv-10832 (AT) (SN) (S.D.N.Y.)**

Dear Judge Torres:

On behalf of Defendants Ripple Labs Inc. (“Ripple”), Bradley Garlinghouse, and Christian A. Larsen, and pursuant to Section IV(A)(ii) of the Court’s Individual Practices in Civil Cases and the Court’s November 4, 2022 order (ECF No. 695), Defendants submit this omnibus Letter-Motion to seal certain documents filed in connection with the Motions for Summary Judgment (together, the “Summary Judgment Materials”), which were filed on September 13, October 18, and November 30, 2022 by Defendants and the SEC (collectively, the “Parties”). *See* ECF Nos. 621-631, 662-665, 667-670, 723-728. Copies of these documents with proposed redactions highlighted have been submitted under seal along with this Letter-Motion.<sup>1</sup> To aid the Court in its consideration of Defendants’ proposed redactions, Defendants have appended a detailed log identifying the basis for sealing or redacting each document. *See* Letter-Motion App’x A.

Defendants seek virtually no redactions to the summary judgment briefs and very limited redactions to the Rule 56.1 statements filed by the Parties. Defendants also seek narrowly-tailored redactions to certain of the exhibits and request, for a small number of highly sensitive and confidential exhibits, that such documents be sealed in their entirety. Defendants’ limited sealing requests are reasonable, narrowly tailored to protect highly confidential business information and the legitimate privacy interests of the many third parties referenced in the Summary Judgment

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<sup>1</sup> To minimize confusion, exhibits to this Letter-Motion retain the exhibit numbering scheme from the Motions for Summary Judgment. For example, the Letter-Motion will refer to, *e.g.*, PX 150 or Ex. 280, not an altogether new numbering scheme. Summary Judgment Materials that are not exhibits (such as Rule 56.1 Statements, declarations, and briefs) will be referred to by their ECF number.

Given the volume and file sizes of the exhibits to this Letter-Motion, Defendants will submit the exhibits under seal directly to the Court by means of secure FTP transfer, with a copy to the SEC, as agreed by the Court by email of December 13, 2022.

Materials, and consistent with redactions Defendants proposed in connection with the *Daubert* Motions, which this Court granted in full earlier this week. *See* Order, ECF No. 737.<sup>2</sup> Finally, the SEC has indicated in prior briefing that it does not oppose Defendants' requests to seal or narrowly redact documents to protect certain of these interests.

## **I. Legal Standard**

There is a presumption of public access to judicial documents. *Brown v. Maxwell*, 929 F.3d 41, 49 (2d Cir. 2019). Courts must "balance competing considerations against" that presumption. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (citation omitted). "Foremost among the competing concerns that a court weighing disclosure must consider is 'the privacy interest of the person resisting disclosure.'" *Mirlis v. Greer*, 952 F.3d 51, 61 (2d Cir. 2020) (quoting *U.S. v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995) (reiterating that "the privacy interests of innocent third parties ... should weigh heavily in a court's balancing equation")). Such considerations also include "the protection of sensitive, confidential, or proprietary business information." *See* Order, ECF No. 422 (citing *SEC v. Telegram Grp. Inc.*, 2020 WL 3264264, at \*3 (S.D.N.Y. June 17, 2020)). These interests establish a "venerable common law exception to the presumption of access." *Amodeo*, 71 F.3d at 1051.

## **II. Defendants' Requests to Seal or Redact the Summary Judgment Materials**

The Summary Judgment Materials are voluminous, even by the standards of complex litigation. The SEC alone attached over 770 exhibits to their Motion for Summary Judgment (many of which the SEC does not even cite) and submitted over 2,000 factual statements pursuant to Local Rule 56.1, each of which Defendants responded to (notwithstanding Defendants' contention that the Court should disregard the SEC's 56.1 statements because they fail to comport with the letter or spirit of Local Rule 56.1, *see* ECF No. 663 at 2-3; ECF No. 724 at 2-3). The SEC's exhibits include highly sensitive and confidential material, including copies of Ripple's audited financial statements, bank account statements, and confidential settlement agreements. Altogether, the Summary Judgment Materials consist of over 1,100 documents, or nearly 40,000 pages. Contrasted with this enormous volume, Defendants' proposed redactions are exceptionally narrow and limited—while they affect many of the documents, the actual redactions are extremely limited, only targeting information that is highly sensitive and would cause harm to Ripple, the Individual Defendants, innocent third parties, and non-party Ripple employees if publicly disclosed. In addition, the very limited information that Defendants propose to redact has no bearing on the Court's resolution of the Motions for Summary Judgment and almost none of it is relevant to the Parties' legal dispute, as evidenced by the exceptionally limited proposed redactions to the briefs and 56.1 statements, or

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<sup>2</sup> On December 12, 2022, the Court established a deadline of January 4, 2023 for all non-parties to submit letters to seal the Summary Judgment Materials, to the extent any non-party requests to seal or redact any additional documents. *See* ECF No. 732. Defendants have given notice to all non-parties whose confidential discovery material produced pursuant to the Protective Order (ECF No. 53) was attached as an exhibit to their Motion for Summary Judgment and have received responses from many of them agreeing to the Defendants' proposed sealing request. A limited number of third parties have either not responded or not yet consented to the proposed redactions and may file their own motions to seal the materials.

even to deposition transcripts. *See, e.g., Amodeo*, 71 F.3d at 1050 (“Where testimony or documents play only a negligible role in the performance of Article III duties, the weight of the presumption [of public access] is low.”). Defendants’ sealing requests are reasonable and fully consistent with the sealing requests that this Court granted in full on December 19, 2022 (ECF No. 737) and that other courts in this Circuit have routinely granted.<sup>3</sup>

### **A. Highly Confidential Financial Information**

Defendants request to seal or narrowly redact a limited number of documents that reflect, or are copies of, Ripple’s audited financial statements or confidential internal financial reports and forecasts. These documents and information are nonpublic and their disclosure would cause significant harm to Ripple’s business interests and competitive standing. *See* Declaration of Kristina Campbell, Chief Financial Officer, Ripple Labs Inc., December 19, 2022 (“Decl.”) ¶¶ 6-9, 21-27 (attached hereto as Exhibit A); *id.* at App’x A (identifying redactions).

#### **1. Audited Financial Statements**

Defendants seek to seal or redact limited materials reflecting highly confidential information from its nonpublic audited financial statements, including from Ripple’s confidential balance sheet, earnings, revenue and expense information of its business lines, and other confidential business information. In particular, Defendants seek to seal Ripple’s recent audited financial statements in their entirety, which the SEC attached as exhibits to their Motion for Summary Judgment. *See* PX 746-751 (ECF Nos. 670-98 – 670-103). The Court recently granted Defendants’ request to seal or redact information from Ripple’s audited financial statements (*see* ECF No. 737 at 5-6), and the SEC has previously indicated that it “does not object to the redaction of ... full financial statements.” ECF No. 570 at 1.

Defendants’ requests should be granted for several reasons—which are the same reasons for which we sought, and the Court granted, redaction of this information in the *Daubert* Motions. *First*, as a private company, Ripple’s financial statements have never been publicly released, and Ripple undertakes significant measures to safeguard their confidentiality, only sharing them under select circumstances and always on a confidential basis. *See* Decl. ¶¶ 6-7; *see also Syntel Sterling Best Shores Mauritius Ltd. v. TriZetto Grp.*, 2021 WL 1541385, at \*3 (S.D.N.Y. Apr. 20, 2021) (granting motion to redact “confidential ... accounting and financial information”); *Valassis Commc’ns, Inc. v. News Corp.*, 2020 WL 2190708, at \*3 (S.D.N.Y. May 5, 2020) (permitting redaction of “financial metrics (such as pricing, costs, revenue, and profits)” and “business information of its active business units, such as ... financial metrics”).

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<sup>3</sup> The Court on December 19 granted Defendants’ requests to redact certain materials that appear again in the Summary Judgment Materials, including the expert reports at PX 13 (ECF No. 630-13), PX 202 (ECF No. 631-2), PX 621 (ECF No. 669-87), PX 707 (ECF No. 670-60), PX 715 (ECF No. 670-68), PX 248 (ECF No. 728-1), Ex. 11 (ECF No. 624-11), Ex. 12 (ECF No. 624-12), Ex. 40 (ECF No. 624-40), Ex. 105 (ECF No. 624-105), Ex. 106 (ECF No. 624-106), Ex. 171 (ECF No. 665-30). *See* Order, ECF No. 737. In connection with this sealing motion, Defendants have proposed the same redactions for these exhibits that the Court previously granted.

*Second*, public disclosure of this information would be highly detrimental because it would reveal detailed information about Ripple’s financial condition, long-term business plans, revenue streams, and expense structures to the marketplace, including Ripple’s competitors, business partners, customers, and prospective customers. *See* Decl. ¶ 8; *see also Kewazinga Corp. v. Microsoft Corp.*, 2021 WL 1222122, at \*6 (S.D.N.Y. Mar. 31, 2021) (permitting redactions of “details of Microsoft’s sources of revenue and the amounts of its revenue and sales” and “specific revenue amounts from certain offerings”). Disclosure of such information could, for example, provide competitors with an unearned advantage by allowing them to develop competing products, pursue the same or similar business partners and markets, or establish revenue and expense structures that compete with Ripple’s.

*Third*, to the extent Defendants have proposed redactions to information derived from Ripple’s financial statements, the relevant substance of the briefs, Rule 56.1 statements, exhibits, and deposition testimony remain undisturbed. Defendants’ narrowly tailored redactions target only the most narrow set of information that would be detrimental for Ripple’s business and partnerships, and the information is irrelevant to the Court’s resolution of the legal issues raised by the Parties’ summary judgment motions. *See, e.g., Amodeo*, 71 F.3d at 1050.

*Fourth*, Defendants’ prior request to redact such highly confidential financial information was recently granted (*see* ECF No. 737), and such requests are regularly granted in this Circuit, particularly with respect to private companies. *See, e.g., Lexington Furniture Indus., Inc. v. Lexington Co., AB*, 2021 WL 1143694, at \*2 (S.D.N.Y. Mar. 24, 2021) (sealing “non-public financial statements” that could “advantage ... competitors and harm their businesses”).

## **2. Internal Financial Reports**

Defendants also seek to seal or redact certain highly sensitive, confidential, and proprietary information from Ripple’s internal financial reports and forecasts regarding its products, business strategies, and lines of business. *See, e.g.,* PX 176 (ECF No. 630-175), PX 704 (ECF No. 670-57), PX 705 (ECF No. 670-58), PX 752 (ECF No. 670-104). These documents include, for example, Ripple’s annual plans and budgets that reflect highly confidential and proprietary information about Ripple’s revenue streams, expense structures, sales, marketing, and pricing strategies, financial projections, and other information about Ripple’s prior and existing products and business lines. *See, e.g.,* PX 27 (ECF No. 630-27), PX 347 (ECF No. 631-146), PX 626 (ECF No. 669-91). Certain of these documents were also prepared for and presented to the Board of Directors to inform the Board’s oversight and decision-making functions. *See, e.g.,* PX 27 (ECF No. 630-27), PX 347 (ECF No. 631-146); *see also Stegmann on Behalf of Covetrus, Inc. v. Wolin*, 2021 WL 1838219, at \*2 (E.D.N.Y. May 7, 2021) (allowing redactions of “confidential agenda, presentations and related materials created for meetings of [company’s] Board of Directors”).

This Court has previously granted Defendants’ requests to redact similar types of documents, most recently in connection with the *Daubert* Motions. *See* Order, ECF No. 737 (allowing redaction of “financial information”); Order, ECF No. 422 (permitting redaction of “Ripple’s proprietary internal business strategies, analyses, impressions, and concerns on a variety of sensitive topics . . . , including, for example Ripple’s business relationships”). Courts in this Circuit routinely grant requests to seal or redact highly confidential financial and business information of this nature. *See, e.g., Valassis*, 2020 WL 2190708, at \*3 (permitting redaction of

“business information of its active business units, such as ... financial metrics”); *Louis Vuitton Malletier S.A. v. Sunny Merch. Corp.*, 97 F. Supp. 3d 485, 510-11 (S.D.N.Y. 2015) (permitting redactions of plaintiff’s “advertising expenditures and plans” and defendants’ “internal business documents, financial information . . . and information about [defendant’s] business operations” that, if revealed, “may provide valuable insights into a company’s current business practices that a competitor would seek to exploit.”) (citation omitted); *Kewazinga*, 2021 WL 1222122, at \*6 (allowing redactions of “details of Microsoft’s sources of revenue and the amounts of its revenue and sales; . . . [and] specific revenue amounts from certain offerings”); *Syntel*, 2021 WL 1541385, at \*3 (granting application to seal sensitive commercial information “regarding [plaintiff’s] client relationships and business processes, among other proprietary information” and defendant’s “proprietary business information”).

Defendants’ reasonably tailored requests should be granted because revelation of this highly confidential and competitively sensitive information to the public would cause material harm to Ripple’s business, competitive standing, relationships with investors, and ability to compete for and secure business partnerships and customers, as it could allow competitors to develop competing products or gain an advantage over Ripple in business negotiations with prospective business partners. *See* Decl. ¶¶ 22-23; *see also, e.g., Playtex Prod., LLC v. Munchkin, Inc.*, 2016 WL 1276450, at \*11 (S.D.N.Y. Mar. 29, 2016) (permitting redactions related to “confidential and sensitive business information, including sales and costs information, presentations, merger discussions, and competitive analyses and product testing,” because of “[p]laintiffs’ privacy interests and the likely harm they may suffer if this ‘highly proprietary material’ is revealed to their competitors”) (citation omitted); *Valassis*, 2020 WL 2190708, at \*3 (granting redactions of plaintiff’s financial metrics because disclosure could “result in significant harm to [plaintiff] without providing much value in the monitoring of the federal courts”) (citing *Amodeo*, 71 F.3d at 1051).

For example, the Summary Judgment Materials contain highly confidential information about the costs, expenses, deal terms, market analyses, and proposed business plans relating to Ripple’s On-Demand Liquidity (“ODL”) product, which is one of Ripple’s main lines of business. *See, e.g.,* PX 626 (ECF No. 669-91). This information is highly sensitive and proprietary and, if revealed, would harm Ripple’s relationships with existing and prospective ODL partners. *See* Decl. ¶ 24. Disclosure of this information would also allow Ripple’s competitors in the cross-border payment marketplace to develop competing products and services, develop competitive pricing policies, or pursue the same or rival customers and vendors. *See* Decl. ¶ 23. The Summary Judgment Materials also contain highly confidential information about Ripple’s current and proposed future plans regarding its XRP escrow strategy. *See, e.g.,* PX 646 (ECF No. 670-2), PX 655 (ECF No. 670-11). Disclosure of this information would harm Ripple’s standing in the fintech marketplace. *See* Decl. ¶ 25.

The SEC has also attached completely unredacted copies of Ripple’s bank account statements, which Defendants seek to seal in their entirety. *See* PX 296 (ECF No. 631-95), PX 753-763 (ECF Nos. 670-105 – 670-115). “Banking records are a highly sensitive type of financial record” and Ripple’s business relationships would be substantially harmed by their disclosure. *Telegram*, 2020 WL 3264264, at \*5-6 (permitting sealing of banking records in connection with summary judgment motion and finding that “[a] party’s interest in the confidentiality of its general financial records is a countervailing factor that can outweigh the public’s right of access.”); *see also*



*Strauss v. Credit Lyonnais, S.A.*, 2011 WL 4736359, at \*4 (E.D.N.Y. Oct. 6, 2011) (“[B]oth American courts and Congress have recognized the importance of protecting the confidentiality of banking records. The records themselves plainly contain information ‘traditionally considered private rather than public.’”) (quoting *Amodeo*, 71 F.3d at 1051); *Adler v. Solar Power, Inc.*, 2019 WL 13214943, at \*2 (S.D.N.Y. Aug. 22, 2019) (permitting redaction of exhibits that “detail transactions in financial accounts”).

## **B. Confidential Financial Terms of Ripple’s Contractual Agreements**

Defendants also request to seal or redact information about Ripple’s confidential business relationships, including the negotiated financial terms of its contractual agreements with certain third-party business partners. *See* Decl. ¶¶ 10-20; *id.* at App’x A (identifying redactions). Defendants’ proposed redactions are narrow and target only the specific financial and pricing terms (such as commission rates, fee amounts, and incentive structures) that Ripple and certain of its past or existing counterparties negotiated, and the Court recently granted Defendants’ identical or similar proposed redactions in connection with the *Daubert* Motions. *See* Order, ECF No. 737. Defendants do not seek to redact the relevant substantive language from contractual provisions cited in the summary judgment briefs or Rule 56.1 statements that pertain to the *Howey* analysis. Thus, while redaction is very important to Ripple’s business interests, the redactions will not affect the public’s ability to access any substantive material pertaining to the merits of the summary judgment motions and the Court’s resolution of them. The redactions are narrowly drawn and warranted in light of their sensitive nature and the highly detrimental effect on Ripple’s business that would result from public disclosure. *See* Decl. ¶¶ 11-19.

In certain very limited circumstances, Defendants have proposed to seal the contractual agreement in its entirety, where the agreement reflects an ongoing contractual relationship with one of Ripple’s current business partners and contains confidentiality provisions preventing disclosure. *See, e.g.*, PX 736 (ECF No. 670-88), PX 651 (ECF No. 670-7), PX 653 (ECF No. 670-9). Disclosure of these particular contracts would be detrimental to Ripple’s business because it would harm its relationships with its business partners—which expect Ripple to abide by the confidentiality provisions of its contracts—and reveal the terms of Ripple’s existing business arrangements to Ripple’s competitors. *See* Decl. ¶ 12.

These sealing requests should be granted for three reasons. *First*, disclosure of this information would be highly detrimental to Ripple’s competitive standing in the fintech marketplace and its business relationships with current and prospective partners. *See* Decl. ¶¶ 12, 14-19. Revelation of the financial terms of its contracts with counterparties and customers, for instance, would reveal the individually negotiated terms obtained by many of its counterparties, which could result in serious damage to Ripple’s negotiating position with future counterparties, and would cause competitors to adjust their sales plans and pricing policies to compete with Ripple in the marketplace.<sup>4</sup> *See* Decl. ¶¶ 17-18. Ripple’s competitors could also leverage this information to undermine Ripple’s existing partnerships and future business opportunities by offering Ripple’s

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<sup>4</sup> In fact, many third parties given notice under the Protective Order communicated to Defendants their full support for the proposed redactions of the specific financial terms, expressing that it is their proprietary business information as well.

existing or prospective counterparties more attractive financial terms. *See* Decl. ¶ 18; *see also* *Amodeo*, 71 F.3d at 1051 (“Commercial competitors seeking an advantage over rivals need not be indulged in the name of monitoring the courts . . .”). Many of the redactions pertain to confidential financial terms with Ripple’s *current* business partners, which makes it even more likely that public disclosure would injure such relationships and be exploited by Ripple’s competitors. *See Valassis*, 2020 WL 2190708, at \*4 (granting redactions of “sensitive business information related to its ongoing businesses”).

*Second*, Defendants’ limited sealing requests primarily target the financial terms of contracts and leave the remaining substantive terms—and the Parties’ factual assertions and legal analyses regarding such contracts—almost entirely unredacted, which will allow the public to access all materials having a “tendency to influence” the Court’s resolution of the summary judgment motions. *Brown*, 929 F.3d at 49 (emphasis omitted); *see also Standard Inv. Chartered, Inc. v. Fin. Indus. Regul. Auth., Ind.*, 347 F. App’x 615, 617 (2d Cir. 2009) (upholding “redaction of only the financial data in . . . IRS correspondence”).

*Finally*, courts regularly grant requests to seal or redact confidential contractual terms, and this Court has previously done so in this case. *See* Order, ECF No. 737 (permitting redaction of “confidential financial terms of Ripple’s business relationships”); Order, ECF No. 422 (permitting redaction of “Ripple’s proprietary internal business strategies, analyses, impressions, and concerns on a variety of sensitive topics . . ., including, for example Ripple’s business relationships”); *see also Graczyk v. Verizon Commc’ns, Inc.*, 2020 WL 1435031, at \*9 (S.D.N.Y. Mar. 24, 2020) (permitting redaction of “[t]he financial information in [Verizon’s] contracts,” which “had no bearing on this Court’s treatment” of the motions at issue); *Syntel*, 2021 WL 1541385, at \*3 (granting redactions of “sensitive customer contract information”); *Valassis*, 2020 WL 2190708, at \*4 (allowing redaction of “specific contracts terms”).

### **C. Identities of Certain Non-Party Financial Institutions, Business Partners, and Customers**

Defendants also seek to protect the identities of certain non-party entities—such as Ripple’s investors, customers, and business partners—whose privacy interests “should weigh heavily in a court’s balancing equation.” *Amodeo*, 71 F.3d at 1050 (citations omitted); *see also* Decl. ¶¶ 11, 15; *id.* at App’x A (identifying redactions). Many of the affected third parties have expressed to Defendants their strong desire for such redactions, to protect their privacy interests. The SEC has previously not objected to Defendants’ application to redact the names of third parties, including the identities of its business partners. *See* ECF No. 565 at 2; ECF No. 570 at 3.

The Court should grant these redactions for several reasons. *First*, the identities of these non-parties have no bearing at all on the Court’s resolution of the summary judgment motions and therefore their privacy interests outweigh the presumption of public access. *See Cohen v. Gerson Lehrman Grp., Inc.*, 2011 WL 4336679, at \*2 (S.D.N.Y. Sept. 15, 2011) (granting motion to redact the identity of specific clients of the defendant where the redactions were “narrowly tailored to conceal the clients’ identity” and the clients’ identities had “no bearing” on the case); *Syntel*, 2021 WL 1541385, at \*3 (granting motion to redact “names of and information regarding Syntel’s clients”).

*Second*, disclosure would be detrimental to these business partners' legitimate privacy interests and Ripple's commercial relationships with them. *See* Decl. ¶¶ 11, 15. Public disclosure of their identities and past or ongoing business relationships with Ripple might cause reputational or commercial harm to those non-parties were they to be revealed in the context of a high-profile SEC litigation; in fact, Ripple's relationships with these business partners has already been challenged by the SEC's case. *See* Decl. ¶ 15. Publication of their identities and the scope of their business relationships with Ripple risks damaging Ripple's partnerships and will potentially chill future business opportunities. Courts have expressly recognized privacy interests in situations where disclosure could "embarrass or harm third party individuals while offering little value to the monitoring of the federal courts." *Whittaker v. MHR Fund Mgmt. LLC*, 2021 WL 4441524, at \*3 (S.D.N.Y. Sept. 28, 2021) (Torres, J.) (citations omitted).

*Third*, the requested redaction of third-party names is consistent with prior rulings in this case, including the Court's recent ruling on Defendants' proposed redactions in connection with the *Daubert* Motions. *See* Order, ECF No. 737 (granting redactions of identities of non-parties); Order, ECF No. 554 (granting motion to redact e-mail addresses of non-parties); Order, ECF No. 422 (granting motion to redact documents reflecting "the identities of third-party customers and prospective investors"); Order, ECF No. 412 (Netburn, J.) (granting motion to redact references to non-parties); Order, ECF No. 393 (Netburn, J.) (same).

#### **D. Identities of Certain Non-Party Ripple Employees**

Defendants request narrowly tailored redactions of the names of certain Ripple employees that appear in the Summary Judgment Materials—specifically, the identities of current and former Ripple employees who were not deposed in this litigation. *First*, these employees' identities are not relevant to the summary judgment motions before the Court, nor does the SEC contend otherwise in its prior submissions. Any public interest in the disclosure of their identities is therefore minimal. *See, e.g., Whittaker*, 2021 WL 4441524, at \*2 (allowing redaction of non-party names "where 'there is no evidence that the identities . . . directly affect the adjudication'") (citation omitted). *Second*, these employees are not parties to this suit and have not been deposed in this litigation. They therefore have significant privacy interests and are entitled to a greater level of protection to prevent unnecessary disclosure of their identities. *See, e.g., In re Google Digit. Advert. Antitrust Litig.*, 2021 WL 4848758, at \*5 (S.D.N.Y. Oct. 15, 2021) (permitting redaction of "the names, job titles and e-mail addresses of Google employees"). *Third*, the Court has previously granted Defendants' requests to redact the identities of non-party Ripple employees, including Defendants' proposed redactions in connection with the *Daubert* Motions. *See, e.g.,* Order, ECF No. 737 (granting redactions of identities of current and former Ripple employees); Order, ECF No. 554 (granting motion to redact e-mail addresses of Ripple employees). *Finally*, the SEC has previously not objected to Defendants' application to redact the identities of Ripple employees. *See* ECF No. 570 at 1.

#### **E. Non-Party Contact Information**

Defendants request narrowly tailored redactions of e-mail addresses and other contact information for current and former Ripple employees and other non-parties that appear in the Summary Judgment Materials. Disclosure of personal contact information for non-parties has no pertinence to the Court's resolution of the pending summary judgment motions. The non-parties



also have a heightened privacy interest in maintaining the confidentiality of their private contact information. *See, e.g., In re Google* 2021 WL 4848758, at \*5 (permitting redaction of “the names, job titles and e-mail addresses of Google employees” and holding that “non-parties to an action may have ‘significant privacy interests’ that favor redaction of identifying information”). Finally, the Court has previously granted Defendants’ requests to redact contact information for non-parties, including Defendants’ proposed redactions in connection with the *Daubert* Motions. *See, e.g., Order*, ECF No. 737 (granting redactions of identifying information of non-parties); *Order*, ECF No. 554 (granting motion to redact e-mail addresses of Ripple employees).

## **F. Employee Compensation Information**

Defendants seek narrowly-tailored redactions of documents and testimony that reflect information about non-party employees’ compensation and bonuses, in line with redactions Defendants proposed in connection with the *Daubert* Motions, which the Court granted. *See Order*, ECF No. 737. Such information is not relevant to the issues raised by the Parties’ summary judgment motions, the affected non-parties have a strong privacy interest in keeping such compensation details confidential, and courts routinely grant requests to seal or redact information about non-party employee compensation. *See, e.g., Valassis*, 2020 WL 2190708, at \*4 (granting motion to redact information about “compensation and bonuses received by individual Valassis employees.”); *Whittaker*, 2021 WL 4441524, at \*3 (permitting redaction of “details of non-party [defendant] employees’ compensation and bonuses” and explaining that “courts in this Circuit have expressly recognized privacy interests in keeping . . . third-party compensation details confidential”); *Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015) (permitting redaction of “sensitive personal information of current and former employees of the parties and [of] affected third-parties, including . . . compensation” included in the summary judgment record); *Oliver Wyman, Inc. v. Eielson*, 282 F. Supp. 3d 684, 706 (S.D.N.Y. 2017) (permitting redaction of compensation information of non-party partners of the plaintiff—including “documents disclosing average and individual partner compensation and information sufficient to deduce partner compensation”—in part because doing so “vindicate[d] the privacy interest these non-parties have in sensitive personal information that outweighs the public’s interest in disclosure”) (internal quotation marks omitted).

Defendants also propose narrowly-tailored redactions to certain documents containing the amounts of Garlinghouse’s compensation from Ripple. *See Defs.’ Counter* 56.1 ¶¶ 218, 844-45, 847 (ECF No. 663); *SEC* 56.1 Statement ¶¶ 218, 844-45, 847 (ECF No. 629); *Ex. 76* at 343:10-11, 343:12, 344:21, 344:22, 344:25, 345:4, 345:7-8 (ECF No. 624-76); *PX 81* at 343:10-11, 343:12, 344:21, 344:22, 344:25, 345:4, 345:7-8, 492, 493 (ECF No. 630-81); *Ex. 78* at 2-3 (ECF No. 624-78); *PX 73* at 2-3 (ECF No. 630-73); *Ex. 79* at 1-2 (ECF No. 624-79); *PX 74* at 1-2 (ECF No. 630-74); *PX 377* at 1-2 (ECF No. 630-377); *Ex. 80* at 1 (ECF No. 624-80); *PX 75* (ECF No. 630-75); *PX 86* at 37 (ECF No. 630-86). Information regarding an individual’s compensation and bonuses is considered “sensitive personal information” that is regularly redacted. *See Dodona I, LLC*, 119 F. Supp. 3d at 156-57 (granting motion to redact “sensitive personal information” of Goldman Sachs employees including compensation information); *Valassis*, 2020 WL 2190708, at \*4 (granting motion to redact information concerning “compensation and bonuses received by individual Valassis employees.”). As such, the “presumption of public access is outweighed” by both Ripple’s “business secrecy interest” and Garlinghouse’s “personal privacy interest” in the amount of his compensation and bonuses. *Id.* at \*4.

### **G. Employment History**

Defendants have proposed narrowly-tailored redactions of documents and deposition transcripts reflecting the employment histories of certain non-parties, including current and former Ripple employees who were deposed. This information is highly sensitive, personal, and not germane to resolving the summary judgment motions, and courts often grant requests to redact such information to protect the legitimate privacy interests and identities of non-parties. *See, e.g., Dodona I, LLC*, 119 F. Supp. 3d at 156 (permitting redaction of “sensitive personal information of current and former employees of the parties and [of] affected third-parties, including . . . biographical information” included in the summary judgment record).

### **H. Confidential Settlement Agreements**

Defendants seek to seal or redact certain confidential settlement agreements between Ripple and third parties. *See, e.g.,* Ex. 66 (ECF No. 624-66), Ex. 67 (ECF No. 624-67), Ex. 71 (ECF No. 624-71), Ex. 72 (ECF No. 624-72). The complete contents of these settlement agreements have no bearing on the adjudication of the summary judgment motions and courts routinely grant such requests due to the confidential nature of such agreements and the obligations of the parties to maintain their confidentiality. *See, e.g., Kewazinga*, 2021 WL 1222122, at \*5 (permitting redactions of “information regarding settlement agreements with third parties, which include confidentiality obligations to those third parties”); *Adler*, 2019 WL 13214943, at \*2 (permitting redaction of exhibits that “include confidential agreements and settlement agreements with third parties”); *Louis Vuitton Malletier, S.A. v. Hyundai Motor Am.*, 2012 WL 1022258, at \*2-3 (S.D.N.Y. Mar. 22, 2012) (permitting redactions of the terms of confidential settlement agreement between plaintiff and third party). Finally, the Court has previously granted requests to seal or redact the terms of confidential settlement agreements, including Defendants’ proposed redactions in connection with the *Daubert* Motions. *See* Order, ECF No. 737.

### **I. Personal Familial Information, Personal Financial Information, and Personal Financial Holdings**

Defendants seek narrowly-tailored redactions of information pertaining to the personal financial holdings of non-parties, including Ripple employees who are not parties to this litigation. *See, e.g.,* PX 352 (ECF No. 631-151). Such information is not relevant to the summary judgment motions and implicates the significant privacy interests of non-parties, and the Court has previously granted requests to redact such information, including recently in connection with the *Daubert* Motions. *See* Order, ECF No. 737 (granting redactions of personal financial information); *see also, e.g., City of Almaty, Kazakhstan v. Ablyazov*, 2021 WL 1177737, at \*2 (S.D.N.Y. Mar. 29, 2021) (allowing redaction of third party’s personal financial information when such information was “essentially irrelevant to the summary judgment motion”).

Defendants seek to redact personal and financial information pertaining to Larsen’s wife, his children, and other family members. *See* ECF No. 663 ¶ 1723; ECF No. 727 ¶ 173; ECF No. 724 ¶ 302; PX 2 (ECF No. 630-2); Ex. 8 (ECF No. 624-8); PX 26 (ECF 630-26); Ex. 25 (ECF No. 624-25); PX 610 (ECF No. 669-76); PX 611 (ECF No. 669-77); PX 612 (ECF No. 669-78); PX 613 (ECF No. 669-79); PX 614 (ECF No. 669-80); PX 616 (ECF No. 669-82); PX 617 (ECF No. 669-83); PX 618 (ECF No. 669-84); PX 619 (ECF No. 669-85); PX 725 (ECF No. 670-77).

Defendants' request should be granted for several reasons. *First*, information about Mr. Larsen's family members—non-parties to this litigation—is not relevant to this case, let alone to the summary judgment motions before the Court. *Second*, courts in the Second Circuit have routinely recognized that non-parties' interests in the privacy of their personal and financial information outweigh the public's interest in access to that information. *See Amodeo*, 71 F.3d at 1051 (“[F]inancial records” and “family affairs” will “weigh more heavily against [public] access.”); *United States Securities and Exchange Commission v. Ahmed*, 2018 WL 4266079, at \*2 (D. Conn. Sep. 6, 2018) (sealing portions of deposition transcripts that “contain personal financial and familial information, the privacy and confidentiality of which outweigh the public's interest in access to that information”); *United States v. Hadden*, 2020 WL 7640672, at \*2, n.2 (S.D.N.Y. Dec. 23, 2020) (providing defendant the opportunity to redact portions of financial statements containing “personal information such as social security numbers, names of minor children, dates of birth, financial account numbers, and home addresses.”); *cf. In re McVane*, 44 F.3d 1127, 1138 (2d Cir. 1995) (“Conjugal or familial association . . . does not, by itself, strip an individual of his or her expectation of privacy.”). *Third*, the privacy interests of Larsen's children are particularly compelling. *See, e.g., Jessup v. Luther*, 277 F.3d 926, 928 (7th Cir. 2002) (“When there is a compelling interest in secrecy, as in the case of . . . the privacy of children, portions and in extreme cases the entirety of a trial record can be sealed.”); *Dillon v. Bush*, 2005 WL 8163072, at \*2 (N.D. Fl. Aug. 12, 2005) (“Courts have recognized that the privacy of children, in particular, is a compelling interest that outweighs the presumption of access.”).

Defendants also seek to redact references to the numerical amount of the Individual Defendants' current XRP holdings in their deposition transcripts. *See* PX 2 (ECF No. 630-2); Ex. 8 (ECF No. 624-8); PX 81 (ECF No. 630-81); Ex. 76 (ECF No. 624-76). The redactions are appropriate. *First*, the redactions are narrowly tailored to address only the amount of XRP held, which is not relevant to the litigation or to the motions for summary judgment. Indeed, the Individual Defendants' current XRP holdings are not referenced in any party's summary judgment briefing or 56.1 statements. *Second*, the Individual Defendants' XRP holdings are informative of their net worth, and the Individual Defendants' privacy interest in that information outweighs the public's interest in access to it. *See SEC v. Whitesel*, 2007 WL 2033384, at \*2 (D.S.D. July 9, 2007) (finding “Defendant's right to privacy [as to his net worth] overcomes the presumption in favor of the common law right of public access to judicial records”).

Additionally, Defendants seek to redact or withhold highly confidential information from two documents reflecting Larsen's, and two documents reflecting Garlinghouse's, account information with a market maker and XRP trading records. *See* Ex. 87 (ECF No. 624-87); PX 389 (ECF No. 631-188); PX 574 (ECF No. 669-40); PX 765 (ECF No. 670-117). *First*, the information at issue here, describing transactions and amounts in a manner similar to bank records, will not impede public access to information relevant to summary judgment issues. The information proposed to be redacted or withheld shows trading records in particular time frames, including amounts Larsen and Garlinghouse received from XRP sales in specific months. Since the aggregated details of Larsen's sales are available in Ex. 81, and those of Garlinghouse in Ex. 82, the specific transactions in a limited time period are not relevant here. *Second*, this type of personal financial information, like bank account records, is traditionally considered private. *See Telegram*, 2020 WL 3264264, at \*5 (“A party's interest in the confidentiality of its general financial records is a countervailing factor that can outweigh the public's right of access.”); *Strauss*, 2011 WL

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4736359, at \*4-5, 7-8 (granting motion to seal financial records including those relating to an account's "transfer, collection, withdrawal and payment instructions," and account balances). Defendants' narrowly tailored request to withhold two documents and redact two others should be granted.

Defendants also propose to seal Larsen's tax returns, as well as communications between Garlinghouse and his tax professionals concerning Garlinghouse's tax returns, which have minimal, if any, relevance to the summary judgment motions before the Court. *See* PX 384 (ECF No. 631-183); PX 438 (ECF No. 627-36); PX 573 (ECF No. 669-39); PX 672 (ECF No. 670-26). Tax returns are regularly sealed because of their highly sensitive and inherently private content. *See Saleem v. Corp. Transp. Grp., Ltd.*, 52 F. Supp. 3d 526, 546 (S.D.N.Y. 2014) (allowing tax returns to be filed under seal because they contain "sensitive financial information"); *Solomon v. Siemens Indus., Inc.*, 8 F. Supp. 3d 261, 285 (E.D.N.Y. 2014) ("Tax returns are generally afforded special protection from public disclosure"); *Kare Distribution, Inc. v. Jam Labels and Cards LLC*, 2011 WL 1328500, at \*2 (D. N.J. Dec. 19, 2011) ("[D]efendants' tax returns reflect their social security and/or EIN numbers and financial information, and thus contain highly confidential information. As such, defendants possess a legitimate private interest that warrants protection from disclosure... Redaction of these materials is not a less restrictive alternative to sealing as the documents are replete with such sensitive information, and thus redacting would render the document meaningless."). Like the tax returns themselves, the communications between Garlinghouse and the tax professionals preparing his tax returns also contain sensitive and private financial information, such as information about his compensation and investments to be included in the returns, warranting sealing. *See Ablyazov*, 2021 WL 1177737, at \*2 (granting motion to seal personal financial information in which movant has "significant privacy interests").

Defendants also propose sealing the Individual Defendants' account statements with a digital asset exchange and related account documents containing transaction information. *See* Ex. 273 (ECF No. 665-132); PX 203 (ECF No. 631-3); PX 411 (ECF No. 630-411); PX 684 (ECF No. 670-38), Ex. 91 (ECF 624-91); PX 394 (ECF No. 631-193); PX 732 (ECF No. 670-84). Bank account records, including bank account numbers, are regularly filed under seal because they reveal highly sensitive financial information traditionally considered private, which overcomes the presumption of public access. The Individual Defendants' digital asset exchange records and account statements are financial records analogous to bank account statements because they describe transactions and amounts, payment instructions, and also, at times, include their bank account numbers and wallet addresses. *See Telegram*, 2020 WL 3264264, at \*5 (recognizing "[a] party's interest in the confidentiality of its general financial records" as a countervailing factor and granting motion to seal Telegram's banking records); *Strauss*, 2011 WL 4736359, at \*4-5, 7-8 (granting motion to seal financial records including those relating to an account's "transfer, collection, withdrawal and payment instructions," account numbers, and account balances); *Prescient Acquisition Grp., Inc. v. MJ Publ'g Trust*, 487 F. Supp. 2d 374, 375 (S.D.N.Y. 2007) (granting motion to seal two bank checks that would otherwise reveal "details of the manner in which [a party] conduct[ed] his personal banking activities"); *Abbey v. 3F Therapeutics, Inc.*, 2010 WL 11677681, at \*1 (S.D.N.Y. Aug. 3, 2010) (granting motion to seal account numbers). The Court has previously granted Defendants' request to redact digital wallet addresses. *See* Order, ECF No. 737. The Individual Defendants have a significant privacy interest in this information,

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which has minimal, if any, relevance to the merits of the summary judgment motions, warranting the sealing of these documents.

Defendants also seek redactions of bank account numbers and transaction data, which is traditionally considered private and confidential. *See Telegram*, 2020 WL 3264264, at \*5-6; *Strauss*, 2011 WL 4736359, at \*4-5; *see also Amodeo*, 71 F.3d at 1051. Defendants also propose redactions of digital wallet addresses. Wallet addresses are analogous to bank account information, such as routing numbers, because they identify where cryptocurrency deposits should go to or be sent from. Bank account numbers and similar types of financial information are regularly redacted or filed under seal, not only because of what they reveal about their holders but also to lessen any risk of financial fraud as a result of publication. *See Prescient Acquisition Grp.*, 487 F. Supp. 2d at 376-7; *Telegram*, 2020 WL 3264264, \*5-6. The Court has previously granted Defendants' request to redact this category of information on privacy grounds, including in connection with the *Daubert* Motions. *See Order*, ECF No. 737. For these reasons, Defendants propose narrowly tailored redactions to protect wallet addresses, which are plainly irrelevant to the summary judgment motions before the Court.

#### **J. Personal Identifiable Information**

Defendants propose a limited number of redactions of sensitive information that must be redacted pursuant to Fed. R. Civ. P. 5.2(a) and Rule IV(A)(i) of the Court's Individual Practices in Civil Cases. These include dates of birth, personal contact information, and other sensitive personal identifiable information that do not pertain to the merits of the summary judgment motions.

#### **K. Other Requests**

Defendants seek to seal highly confidential and proprietary investment memos prepared by one of Ripple's potential investors which are not relevant to the Parties' legal dispute and implicate legitimate privacy interests. *See* PX 695 (ECF No. 670-49), PX 696 (ECF No. 670-50). Disclosure of this material would bring harm to this non-party because it would reveal its proprietary analysis, provide competitors with an advantage, and imperil Ripple's relationships with its current and prospective investors, making it difficult for Ripple to secure future financing. *See, e.g., Telegram*, 2020 WL 3264264, at \*3 (permitting redaction of non-parties' "internal analyses of [an] investment opportunity" because "disclosure of internal financial analyses of a business opportunity by a professional investment firm could reveal proprietary analysis and provide competitors with an unearned advantage" and because any public right of access to such materials was "outweighed by non-parties' interests in privacy and the protection of proprietary business information"); *Dodona I, LLC*, 119 F. Supp. 3d at 156 (permitting redaction of third parties' "internal corporate documents that govern investment strategies").

Defendants also seek to withhold Ripple's Wells submission to the SEC, which was submitted during the investigation and which the SEC attached as an exhibit to their motion. *See* PX 442 (ECF No. 627-40). Ripple's pre-litigation communications with and submissions to the SEC in connection with the SEC's investigation are not pertinent to the issues raised by the parties' summary judgment motions, and communications made by Ripple to the SEC in seeking to resolve a nonpublic investigation are entitled to confidentiality. Full disclosure of such communications would discourage future recipients of SEC subpoenas and document requests from communicating



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with the SEC to amicably resolve matters before they are referred to litigation. In light of these considerations, courts have permitted parties to seal or redact their communications with or submissions to regulators. *See, e.g., Hanks v. Voya Ret. Ins. & Annuity Co.*, 2020 WL 5813448, at \*3 (S.D.N.Y. Sept. 30, 2020) (permitting redactions of the “substance of Defendants’ communications with (and submissions to) state insurance regulators”); *AngioDynamics, Inc. v. C.R. Bard, Inc.*, 2022 WL 2643583, at \*25 (N.D.N.Y. July 8, 2022) (granting party’s motion to seal information regarding regulatory filings and submission); *Williams-Roberts v. Coloplast Corp.*, 2021 WL 3570707, at \*2 (N.D. Ind. Feb. 18, 2021) (allowing party to redact communications with regulator in connection with summary judgment motions and exhibits).

Respectfully submitted,

/s/ Andrew J. Ceresney

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cc: All Counsel of Record (via ECF)

# Appendix A

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
ECF No. 628	Plaintiff SEC's Memorandum of Law in Support of Its Motion for Summary Judgment	Redactions	Personal financial information of non-parties
ECF No. 726	Plaintiff SEC's Reply Memorandum of Law in Further Support of its Motion for Summary Judgment	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants
ECF No. 629	Plaintiff SEC's Local Rule 56.1 Statement in Support of Its Motion for Summary Judgment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers
ECF No. 668	Plaintiff SEC's Response and Counter-Statement to Defendants' Local Rule 56.1 Statement in Opposition to Defendants' Motion for Summary Judgment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers
ECF No. 727	Plaintiff SEC's Response to Defendants' Statement of Additional Material Facts Pursuant to Local Rule 56.1(b)	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information
ECF No. 627	Declaration of Jorge G. Tenreiro in Support of Plaintiff's Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 630	Declaration of Ladan F. Stewart in Support of Plaintiff's Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 631	Declaration of Mark R. Sylvester in Support of Plaintiff's Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 669	Declaration of Ladan F. Stewart in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 670	Declaration of Mark R. Sylvester in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 728	Declaration of Mark R. Sylvester in Support of Plaintiff SEC's Response to Defendants' Statement of Additional Material Facts Pursuant to Local Rule 56.1(b)	Redactions	Identity or contact information of third party
PX 002	Deposition Transcript of Christian A. Larsen, dated September 14, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants; Personal financial information of non-parties; Personal Familial Information; Personal financial holdings
PX 003	Investigative Testimony of Patrick A. Griffin	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 004	Information Regarding XRP II, LLC's History and Business	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 005	Instructions For License to Engage in Virtual Currency Business Activity	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 006	Deposition Transcript of David Schwartz, dated May 26, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 007	Investigative Testimony of David Schwartz	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 008	Responses and Objections of Defendant Ripple Labs to Plaintiff's First Set of Requests for Admissions	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 009	Email chain dated January 23, 2018 with attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 010	Deposition Transcript of Phillip Rapoport, dated July 22, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 013	Expert Rebuttal Report of SEC Expert No. 1, dated November 12, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
PX 014	Deposition Transcript of Patrick Griffin, dated June 29, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 015	Deposition Transcript of Asheesh Birla, dated June 23, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties
PX 016	Investigative Testimony of Asheesh Birla	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 017	Deposition Transcript of Monica Long, dated June 17, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 018	Deposition of Antoinette O Gorman	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 019	Deposition Transcript of Ryan Zagone, dated July 20, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 020	Deposition Transcript of Miguel Vias, dated June 28, 2021	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 021	Investigative Testimony of Miguel Vias	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee

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Document	Document Description	Sealing Request	Sealing Basis
PX 022	Deposition Transcript of Dinuka Samarasinghe, dated June 9, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties; Employment history of non-parties
PX 023	Deposition of Ron Will	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 024	Deposition Transcript of Ethan Beard, dated August 24, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 025	Deposition Transcript of Breanne Madigan, dated May 18, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 026	Deposition Transcript of Third Party, dated August 11, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information
PX 027	Email chain dated January 10, 2020 and attachment	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 028	Email dated October 9, 2013 and attachment	Redactions	Identity or contact information of Ripple employee
PX 029	Email dated October 17, 2013 and attachment	Redactions	Identity or contact information of Ripple employee
PX 030	Email chain dated October 22, 2013 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 031	Email dated August 21, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 032	Email chain dated October 9, 2017	Redactions	Identity or contact information of Ripple employee
PX 033	Email chain dated July 30, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 034	Email chain dated April 30, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 035	Email chain dated June 1, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 036	Investigative Testimony Transcript of Bradley Garlinghouse, dated September 10, 2020	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
PX 037	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 038	Email dated April 19, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 039	Email chain dated January 17, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 040	Email dated January 7, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 041	Email chain dated December 12, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 042	Email dated November 21, 2016 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 043	Email dated March 28, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 044	Email chain dated November 24, 2013	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 045	Declaration of Chris Ferrante	Redactions	Confidential information from Ripple financial statements; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 046	Email chain dated March 28, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 047	Email dated January 31, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 048	Chats dated January 8, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 050	Email chain dated January 2, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 051	Email chain dated April 3, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 052	Email dated May 9, 2013 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 053	Email dated October 25, 2013 and attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 054	Email dated July 19, 2013 and attachments	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 055	Email chain dated June 10, 2014 and attachments	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 056	Email dated July 25, 2014 and attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 058	Email chain dated July 22, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 059	Email chain dated November 27, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 060	Email chain dated December 7, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 061	Email chain dated November 15, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 062	Email chain dated December 13, 2013	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 063	Email dated June 10, 2013	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 064	Text message dated October 8, 2017	Redactions	Identity or contact information of Ripple employee
PX 065	Email chain dated March 23, 2017	Redactions	Identity or contact information of third party
PX 066	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 067	Email chain dated May 6, 2017	Redactions	Employee compensation terms; Identity or contact information of Ripple employee
PX 068	Email dated January 4, 2017	Redactions	Identity or contact information of Ripple employee
PX 069	Email chain dated November 9, 2017	Redactions	Identity or contact information of Ripple employee
PX 070	Email chain dated March 22, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 071	Chats dated April 12, 2018	Redactions	Identity or contact information of Ripple employee
PX 072	Email chain dated June 25, 2014 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 073	Brad Garlinghouse Employment Offer Letter	Redactions	Employee compensation terms; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 074	Notice of XRP Ledger Address Award, to Brad Garlinghouse, May 29, 2019	Redactions	Employee compensation terms; Identity or contact information of Ripple employee; Digital wallet address
PX 075	Notice of XRP Unit Bonus Award, to Brad Garlinghouse, December 13, 2016	Redactions	Employee compensation terms; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 076	Email chain dated August 6, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 077	Memorandum dated November 16, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 078	Email chain dated September 3, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 079	Email dated September 29, 2014 and attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 081	Deposition Transcript of Bradley Garlinghouse, dated September 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third-party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
PX 082	Email dated November 29, 2013 and attachment	Redactions	Identity or contact information of Ripple employee
PX 083	Email dated April 4, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 084	Responses and Defenses of Ripple to Plaintiff's Fourth Set of Requests for Admission	Redactions	Identity or contact information of third party
PX 085	Responses and Defenses of Ripple to Plaintiff's Second Set of Requests for Admission	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 086	Responses and Objections of Garlinghouse to Plaintiff's First Set of Requests for Admission	Redactions	Employee compensation terms; Identity or contact information of third party
PX 087	Email chain dated June 24, 2015 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 088	Email dated May 12, 2018 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 089	Email dated December 7, 2017 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 090	Email dated May 8, 2013	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 091	Email dated July 23, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 092	Email chain dated September 11, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 093	Email dated January 18, 2018 and attachments	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 094	Ripple Responses to Plaintiff's Fifth Set of Requests for Admissions	Redactions	Identity or contact information of Ripple employee
PX 095	Email dated May 8, 2014	Redactions	Identity or contact information of Ripple employee
PX 096	Email dated May 23, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 097	Email chain dated September 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 098	Email chain dated November 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 099	Email dated March 27, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 100	Email chain dated August 1, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 101	Email dated November 30, 2013	Redactions	Identity or contact information of Ripple employee
PX 102	Email chain dated April 8, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 103	Email dated April 21, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 104	Email dated May 2, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 105	Email dated April 30, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 106	Email chain dated May 4, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 107	Email chain dated July 30, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 108	Email dated June 3, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 109	Email chain dated April 14, 2014	Redactions	Identity or contact information of Ripple employee
PX 111	Email chain dated August 18, 2014	Redactions	Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee



Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 112	Email chain dated May 8, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 113	Email chain dated November 22, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 114	Email dated June 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 115	Email dated May 1, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of Ripple employee
PX 116	Email dated May 16, 2017	Redactions	Highly confidential/sensitive/proprietary business information
PX 117	Email chain dated November 27, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 118	Email chain dated December 3, 2017	Redactions	Identity or contact information of Ripple employee
PX 119	Email dated December 12, 2017	Redactions	Identity or contact information of third party
PX 120	Email dated January 5, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 121	Text message dated May 16, 2017	Redactions	Identity or contact information of third party
PX 122	Text message dated December 7, 2017	Redactions	Identity or contact information of Ripple employee
PX 123	Email chain dated September 28, 2015	Redactions	Identity or contact information of Ripple employee
PX 124	Email chain dated March 25, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 125	Email chain dated December 21, 2017 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 126	Email dated December 17, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 128	Email chain dated December 14, 2017	Redactions	Identity or contact information of third party
PX 129	Email dated April 10, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 130	Email chain dated April 29, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 131	Email chain dated April 8, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 132	Email chain dated April 8, 2017	Redactions	Identity or contact information of third party
PX 133	Email chain dated May 1, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 134	Email dated December 15, 2017 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 136	Email chain dated March 31, 2017	Redactions	Identity or contact information of third party
PX 137	Email chain dated March 31, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 138	Email chain dated October 15, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 139	Text message dated November 3, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 140	Email chain dated August 10, 2017	Redactions	Identity or contact information of third party
PX 141	Email chain dated July 28, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 142	Email chain dated April 3, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 143	Email chain dated March 21, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 144	Email chain dated January 11, 2018	Redactions	Identity or contact information of third party
PX 145	Email dated July 1, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 146	Email chain dated June 26, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 147	Email chain dated March 22, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 148	Email chain dated April 19, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 149	Email dated December 19, 2013 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 150	Email chain dated November 30, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 151	Email chain dated November 21, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 152	Email chain dated May 21, 2014	Redactions	Identity or contact information of third party
PX 153	Email dated July 21, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 154	Email chain dated July 5, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 155	Email dated April 2, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 156	Email chain dated April 15, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 157	Email chain dated August 19, 2016 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 158	Email dated September 3, 2013 with attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 159	Email chain dated March 23, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 160	Email chain dated June 21, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 161	Email dated March 26, 2017	Redactions	Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 162	Email chain dated April 10, 2017	Redactions	Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 163	Email dated March 22, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 164	Email chain dated May 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 165	Email chain dated October 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 166	Email chain dated July 23, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 167	Chat dated April 11, 2019	Redactions	Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 168	Information Regarding XRP II, LLC's History and Business	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party
PX 169	Letter Response by Counsel to Inquiry from the New York State Department of Financial Services, dated March 9, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 170	Email chain dated April 22, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 171	Email chain dated September 20, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 172	Email chain dated May 30, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 173	Declaration of Third Party, dated August 22, 2022	Redactions	Identity or contact information of third party
PX 174	Email chain dated July 10, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 175	Email chain dated November 16, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 176	Email chain dated April 20, 2020 with attachment	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements
PX 177	Email dated April 23, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 178	Email chain dated August 16, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 179	Email chain dated February 22, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 180	Standalone table with Quarterly XRP Sales	Redactions	Confidential information from Ripple financial statements
PX 181	Chat dated August 18, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 182	Email chain dated January 10, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 183	Email dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 184	Email dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 185	Chats dated June 23-24, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 186	Email chain dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 187	Email chain dated July 6, 2020 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 188	Email chain dated July 14, 2020	Redactions	Identity or contact information of Ripple employee
PX 189	Email chain dated November 24, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 190	Email dated July 21, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 191	Email chain dated August 6, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 192	Email chain dated October 14 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 193	Email chain dated July 2, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 194	Email dated July 29, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 195	Email chain dated September 6, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 196	Email chain dated April 3, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 197	Email chain dated October 14, 2016	Redactions	Identity or contact information of third party
PX 198	Email chain dated June 27, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 199	Email dated August 21, 2020 with attachments	Redactions	Confidential information from Ripple financial statements; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 200	Email dated May 9, 2018 with attachment	Redactions	Employee compensation terms; Identity or contact information of Ripple employee
PX 202	Amended Expert Report of SEC Expert No. 3	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 203	Garlinghouse XRP Sales Spreadsheet	Sealed In Entirety	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual Defendants
PX 204	Email chain dated May 7, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 205	Email chain dated May 24, 2017	Redactions	Identity or contact information of third party
PX 206	Email chain dated December 18, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 207	Email chain dated June 4, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 208	Email chain dated June 7, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 209	Email chain dated June 18, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 210	Email chain dated July 8, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 211	Master XRP Purchase Agreement between Ripple Labs Inc. and counterparty, dated September 24, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 212	Chart showing XRP sales to third party between 2/20/2019 and 4/24/2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 213	Email chain dated August 19, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 214	Email chain dated August 21, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 215	Board Minutes dated December 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 216	Email chain dated August 27, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 217	Email chain dated September 1, 2017	Redactions	Identity or contact information of Ripple employee
PX 218	Email chain dated February 26, 2013 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 219	Email chain dated September 30, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 220	Email chain dated October 7, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 221	Email dated February 24, 2013 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 222	Email chain dated October 20, 2017	Redactions	Identity or contact information of third party
PX 223	Email chain dated November 20, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 224	Email chain dated December 5, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 225	Email chain dated December 5, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 226	Email chain dated December 5, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 227	Email chain dated December 11, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 228	Email chain dated January 3, 2018	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 229	Email chain dated January 6, 2018	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 230	Email chain dated January 12, 2018	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 231	Email dated January 12, 2018	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 232	Email dated January 14, 2018	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 233	Email dated December 17, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 234	Email chain dated November 18, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 235	Presentation dated November 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 236	Email chain dated May 1, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 237	Email chain dated March 7, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 239	Email chain dated April 11, 2016	Redactions	Identity or contact information of Ripple employee
PX 240	Email chain dated June 22, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 242	Email chain dated February 2, 2013 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 243	Email dated November 8, 2012 with attachments	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 244	Email chain dated May 26, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 245	Email dated September 18, 2017 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 246	Memo from Counsel re: Analysis of Whether XRP is a Security, dated February 27, 2015	Redactions	Identity or contact information of third party
PX 247	Email chain dated July 28, 2015 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 248	Expert Rebuttal Report of SEC Expert No. 3, dated November 12, 2021	Redactions	Identity or contact information of third party
PX 249	Email chain dated October 30, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 250	Email chain dated October 31, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 251	Email chain dated January 3, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 252	Email chain dated March 11, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 253	Email chain dated May 2, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 254	Email chain dated April 10, 2017	Redactions	Identity or contact information of Ripple employee
PX 255	Email chain dated June 16, 2018	Redactions	Identity or contact information of Ripple employee
PX 257	Email dated June 8, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 258	Deposition of William Hinman	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 259	Presentation on Target Markets for XRP	Redactions	Identity or contact information of third party
PX 260	Email dated August 16, 2018 with attachment	Redactions	Identity or contact information of Ripple employee
PX 261	Email dated September 4, 2018 with attachment	Redactions	Identity or contact information of Ripple employee
PX 262	Email chain dated October 19, 2018	Redactions	Identity or contact information of Ripple employee
PX 264	Email dated December 21, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 266	Email chain dated October 12, 2015 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 268	Email dated June 27, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 269	Email chain dated November 29, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 270	Email chain dated November 20, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 271	Email chain dated November 27, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 272	Email chain dated April 9, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 273	Email chain dated April 30, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 274	Email chain dated December 16, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 275	Email chain dated December 18, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 276	Email chain dated May 9, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 277	Email chain dated October 18, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 278	Email chain dated October 11, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 279	Chat dated May 28, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 280	Email chain dated December 23, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 281	Email chain dated July 11, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 282	Master XRP Purchase and Custody Agreement between XRP II, LLC and counterparty, dated June 10, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 283	Master XRP Purchase Agreement between XRP II, LLC and counterparty, dated October 12, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 284	Master XRP Purchase Agreement between XRP II, LLC and counterparty, dated February 22, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 285	Master XRP Purchase Agreement between XRP II, LLC and counterparty, dated August 6, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 286	Ripple Currency Wholesale Sales Order with counterparty, dated March 6, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 287	Ripple Currency Wholesale Sales Order with counterparty, dated April 25, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 288	Ripple Currency Wholesale Sales Invoice with counterparty, dated January 30, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 289	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 290	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 291	Ripple Currency Purchase Letter of Intent with counterparty, dated July 14, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 292	Email withheld for privilege, with attachments	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 293	Email chain dated December 3, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 294	Ripple Currency Purchase Letter of Intent with counterparty, dated May 29, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 295	Ripple Currency Wholesale Sales Invoice with counterparty, dated June 26, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 296	XRP II, LLC bank account information	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Bank account numbers; Digital wallet address
PX 297	Email chain dated August 1, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 298	Email chain dated October 29, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 299	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 300	Summary of XRP Purchase by counterparty from XRP II, LLC, dated June 9, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 301	Summary of XRP Purchase by counterparty from XRP II, LLC, dated July 12, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 302	Master XRP Purchase Agreement between XRP II, LLC and counterparty, dated August 6, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 303	Summary of XRP Purchase by counterparty from XRP II, LLC, dated August 8, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 304	Master XRP Purchase Agreement between XRP II, LLC and counterparty, dated February 22, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 305	Summary of XRP Purchase by counterparty from XRP II, LLC, dated April 2, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 306	Summary of XRP Purchase by counterparty from XRP II, LLC, dated June 20, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 307	Summary of XRP Purchase by counterparty from XRP II, LLC, dated February 12, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 308	Email chain dated August 3, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers

Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 309	Email chain dated September 14, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 310	Letter agreement between XRP II, LLC and counterparty, dated September 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 311	Email chain dated August 2, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 312	Private Placement Memorandum of third party, dated August 3, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 313	Chat dated August 2, 2018 through February 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 314	Subscription Agreement with third party, dated August 6, 2018	Redactions	Identity or contact information of third party; Bank account numbers
PX 315	Chat, undated	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 316	Receipt of XRP purchase by counterparty from XRP II, LLC, dated August 9, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 317	Email chain dated August 9, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers
PX 318	Email chain dated August 8, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 319	Email chain dated August 20, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 320	Email chain dated August 29, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 321	Email dated September 14, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 322	Email dated September 14, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 323	Email dated March 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 324	Letter Agreement between XRP II, LLC and counterparty, dated September 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 325	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 27, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 326	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 28, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 327	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 29, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 328	Email chain dated October 12, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 329	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated May 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 330	Summary of XRP Commitment by counterparty, dated May 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 331	Receipt of XRP purchase by counterparty from XRP II, LLC, dated May 27, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 332	Email dated August 24, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 333	Redacted email with attachment	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 334	Invoice to counterparty dated August 24, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Ripple contact information
PX 335	Email chain dated February 28, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 336	Master XRP Commitment to Sell Agreement between Ripple Services Inc. and XRP II, LLC and counterparty, dated May 1, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 337	Summary of XRP Commitment by counterparty, dated June 1, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 338	Receipt of XRP Purchase by counterparty from XRP II, LLC, dated May 29, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 339	Invoice to counterparty, dated June 8, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 340	Receivers Product Story, H2 2020, dated June 16, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 341	Transcription of Recording of RippleNet Sender Product Story, dated September 12, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 342	Email chain dated June 15, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 343	Email chain dated September 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 344	Email chain dated October 24, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 345	Email chain dated January 19, 2018	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 346	Email dated December 21, 2017 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee



Document	Document Description	Sealing Request	Sealing Basis
PX 347	2019 Annual Plan, dated December 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 348	Financial Forecast presentation, undated	Redactions	Confidential information from Ripple financial statements
PX 349	xRapid Market Maker Status Update, dated March 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 351	Email chain dated March 3, 2017	Redactions	Identity or contact information of Ripple employee
PX 352	Email chain dated August 6, 2020	Redactions	Identity or contact information of Ripple employee; Personal Financial Information; Non-Party Personal Financial Information; Digital Wallet
PX 353	Email chain dated April 30, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 354	Email dated July 2, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 355	Email chain dated June 5, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 356	Email chain dated October 8, 2013 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 357	Email dated October 23, 2018 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 358	Email chain dated December 14, 2017	Redactions	Identity or contact information of third party
PX 359	Email chain dated February 18, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 360	Email chain dated November 26, 2014	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 361	Email chain dated November 16, 2012	Redactions	Identity or contact information of third party
PX 362	Email chain dated April 11, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 363	Email dated March 9, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 364	Email chain dated August 18, 2012 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 365	The Ripple Protocol: A Deep Dive for Finance Professionals, dated September 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 366	Email dated September 12, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 367	Email chain dated April 22, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 368	Email chain dated September 25, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 369	Email chain dated April 22, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 370	Email chain dated May 17, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 371	Email chain dated December 6, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 372	Email dated December 2, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 373	Email chain dated March 28, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 374	Email chain dated October 16, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 375	Email dated December 16, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 376	Email chain dated October 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 377	Email dated March 1, 2018 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 378	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 379	Email chain dated April 27, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 380	Email chain dated November 2, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 381	Email chain dated February 22, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 382	Email chain dated April 10, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 383	Email chain dated May 24, 2016 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 384	Information on Larsen XRP Sales between 2012 and 2020	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Personal financial information of Individual Defendants; PII; Identity or contact information of Ripple employee
PX 385	Email chain dated November 5, 2015	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 386	Email chain dated December 15, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 387	Email chain dated April 10, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 388	Email chain dated February 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 389	Email chain dated May 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Financial Information
PX 390	Email chain dated August 23, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 391	Text messages dated July 24, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 392	Email chain dated August 3, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 393	Christian Larsen's Response to Plaintiff's First Set of Interrogatories	Redactions	PII
PX 394	Digital asset exchange account information of Christian Larsen	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Bank account numbers; Personal Financial Information of Individual Defendants
PX 395	Email chain dated February 28, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 396	Email chain dated August 31, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 397	Transcript of Recording of Weekly Meeting, dated February 26, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 398	Declaration of Christopher Ferrante, dated October 18, 2022	Redactions	Confidential information from Ripple financial statements
PX 399	Email chain dated June 12, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 400	Email chain dated June 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 401	Email chain dated June 21, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 402	Email chain dated September 19, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 404	Email dated May 1, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 405	Email dated October 25, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 406	Transcript of Recording of Meeting, dated December 14, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 407	Email dated December 15, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 408	Transcript of Recording of Q1 2017 All Hands Meeting, dated April 4, 2017	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 409	Email chain dated February 7, 2019 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 410	Transcript of Recording of Q2 2018 All Hands Meeting, dated July 10, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 411	Digital asset exchange account information of Bradley Garlinghouse	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
PX 412	Chats dated January 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 413	Text messages dated June 25, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 414	Email chain dated December 11, 2017	Redactions	Identity or contact information of Ripple employee
PX 415	Email dated December 9, 2020 with attachment	Redactions	Identity or contact information of third party
PX 416	Chats dated January 16, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 417	Transcript of Recording of Q4 2017 All Hands Meeting, dated December 12, 2017	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 418	Email chain dated September 6, 2019	Redactions	Identity or contact information of Ripple employee
PX 419	Email dated June 3, 2020	Redactions	Identity or contact information of Ripple employee
PX 420	Email chain dated July 17, 2017	Redactions	Identity or contact information of Ripple employee
PX 421	Email chain dated July 1, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 422	Transcription of Recording of Weekly Meeting, dated April 22, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 423	Transcript of Recording of Q4 2017 All Hands Meeting, dated December 12, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 424	Email chain dated June 25, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 425	Master XRP Purchase Agreement between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 426	Email chain dated June 3, 2020	Redactions	Identity or contact information of Ripple employee
PX 427	Email chain dated June 4, 2020	Redactions	Identity or contact information of Ripple employee
PX 428	Email dated July 8, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 429	Email dated July 17, 2020 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 430	Email chain dated July 17, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 431	Email chain dated May 31, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 432	Email chain dated July 6, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 433	Email chain dated March 28, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee

Document	Document Description	Sealing Request	Sealing Basis
PX 434	Email chain dated August 21, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 435	Email chain dated October 11, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 436	Email dated July 27, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 437	Email dated December 1, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 438	Email chain dated October 14, 2020 with attachment	Sealed In Entirety	Identity or contact information of third party; Identity or contact information of Ripple employee; Employee compensation terms; Personal financial information of Individual Defendants
PX 439	Email chain dated July 20, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 441	Email chain dated September 10, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 442	Wells Submission on Behalf of Ripple Labs	Sealed In Entirety	Highly confidential/sensitive/proprietary business information
PX 443	Email chain dated March 29, 2020	Redactions	Identity or contact information of Ripple employee
PX 444	Email chain dated March 29, 2020	Redactions	Identity or contact information of Ripple employee
PX 445	Email chain dated September 13, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 446	Email dated May 22, 2018	Redactions	Identity or contact information of Ripple employee
PX 447	Declaration of Third Party	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 448	Christian Larsen's Responses to Plaintiff's First Set of Requests for Admissions	Redactions	Identity or contact information of third party
PX 449	Email chain dated January 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 450	Email chain dated December 11, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 451	Email chain dated January 16, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 452	Email chain dated July 9, 2015 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 453	Email chain dated December 1, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 455	Email chain dated June 9, 2020	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 456	Email chain dated November 12, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 457	Transcript of audio file, dated October 1, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 458	Email dated November 20, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 459	Email chain dated August 8, 2018	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 460	Ripple's Rebate & Incentive Agreements with Digital Currency Exchanges	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 461	Email chain dated June 4, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 462	Email chain dated November 6, 2014	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 463	Email chain dated April 13, 2016 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 464	Email dated June 26, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 465	Email chain dated April 10, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 466	Email chain dated August 13, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 467	Email chain dated August 16, 2019	Redactions	Identity or contact information of Ripple employee
PX 468	Email chain dated October 20, 2020	Redactions	Identity or contact information of Ripple employee
PX 469	Email chain dated July 17, 2019	Redactions	Identity or contact information of Ripple employee
PX 470	Email chain dated January 26, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 471	Email chain dated July 13, 2016	Redactions	Identity or contact information of Ripple employee
PX 472	Ripple Labs XRP Insider Trading Policy, dated December 2018	Redactions	Identity or contact information of Ripple employee
PX 473	Email chain dated March 19, 2013	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 474	Email chain dated July 15, 2013	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 475	Email chain dated October 10, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 476	Email chain dated October 8, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 477	Email chain dated June 2, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 478	Email chain dated June 3, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 479	Email dated June 7, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 480	Email chain dated November 1, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 481	Email chain dated October 2, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 483	Text dated January 16, 2014	Redactions	Identity or contact information of Ripple employee
PX 484	Email dated October 4, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 485	Email chain dated April 13, 2017	Redactions	Identity or contact information of Ripple employee
PX 486	Email dated January 20, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 487	Email dated March 26, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 489	Email dated July 22, 2019 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 490	Email chain dated September 11, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 491	Email chain dated April 19, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 492	Email chain dated December 9, 2015	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 493	Email chain dated May 6, 2016	Redactions	Identity or contact information of Ripple employee
PX 494	Email chain dated June 3, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 495	Email chain dated November 2, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 496	Email chain dated August 6, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 497	Email chain dated September 21, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 498	Email chain dated June 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 499	Email chain dated January 30, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 505	Email regarding Investigation, May 4, 2018	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 510	Declaration of SEC Expert No. 2, dated May 27, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 511	Declaration of SEC Expert No. 1, dated June 22, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 513	Declaration of SEC Expert No. 4, dated June 12, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 514	Declaration of SEC Expert No. 3, dated April 22, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 515	Email chain dated January 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 516	Email dated March 11, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 517	Email dated December 11, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 518	Email dated January 15, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 519	Transcription of Recording of Q4 2017 All Hands meeting, dated December 12, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 520	Email chain dated March 28, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 521	Email chain dated March 23, 2017	Redactions	Identity or contact information of third party
PX 522	Email dated January 16, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 523	Email chain dated June 24, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 526	Email chain dated June 9, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 528	Email chain dated January 4, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 529	Email chain dated August 1, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 530	Email chain dated October 25, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 532	Email chain dated March 21, 2016 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 533	Email chain dated June 24, 2015 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 535	Email dated April 3, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 537	Email chain dated January 5, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 538	Email chain dated August 7, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 539	Email chain dated November 30, 2015	Redactions	Identity or contact information of Ripple employee
PX 541	Email chain dated November 29, 2017	Redactions	Identity or contact information of Ripple employee
PX 543	Declaration of Third Party, dated September 13, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers
PX 545	Email chain dated November 18, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 547	Slack chat dated June 24, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 548	Email chain dated October 27, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee

Document	Document Description	Sealing Request	Sealing Basis
PX 552	Email chain dated January 31, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 555	Email chain dated April 15, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 556	Email chain dated December 18, 2014 with attachment	Redactions	Identity or contact information of Ripple employee
PX 557	Agreement among Larsen, Jed McCaleb, and Arthur Britto, dated September 17, 2012	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 559	Email dated February 20, 2019	Redactions	Identity or contact information of third party
PX 561	Email chain dated March 22, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 562	Email chain dated May 11, 2018	Redactions	Identity or contact information of third party
PX 564	Email dated May 3, 2019 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 565	Exchange Analysis – U.S. Customers	Redactions	Identity or contact information of third party
PX 566	XRP Sales Exchange Geography	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party
PX 567	Slack chat, dated October 8, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 569	Ripple's Employee and Board Member XRP Trading Plan Instructions and Form	Redactions	Employee compensation terms; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 571	Deposition transcript of Alan Schwartz, dated February 11, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 573	Email chain dated March 31, 2018	Sealed In Entirety	Identity or contact information of third party; Identity or contact information of Ripple employee; Employee compensation terms; Personal financial information of Individual Defendants
PX 574	Email chain dated June 23, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 575	Email chain dated September 28, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information; Bank account information
PX 576	Email dated October 7, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 577	Email chain dated September 19, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 578	Email dated May 19, 2017	Redactions	Identity or contact information of third party
PX 579	Email dated May 6, 2017	Redactions	Identity or contact information of third party
PX 580	Email dated April 21, 2017	Redactions	Identity or contact information of third party
PX 581	Email dated January 23, 2018	Redactions	Identity or contact information of third party
PX 582	Email chain dated December 27, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 583	Email chain dated March 29, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Ripple contact information
PX 584	Email chain dated December 1, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Ripple contact information
PX 585	Slack chats dated September 15, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Ripple contact information
PX 586	Slack chats dated August 9, 2017	Redactions	Identity or contact information of Ripple employee
PX 587	Email chain dated March 22, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 588	Email chain dated March 5, 2018	Redactions	Identity or contact information of Ripple employee
PX 589	Email chain dated January 5, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 590	Email chain dated October 2, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 591	Ripple.com Report, dated September 2016	Redactions	Identity or contact information of third party
PX 592	Email chain dated September 19, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 593	Email dated May 22, 2017	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 594	Slack chats dated April 3, 2019	Redactions	Identity or contact information of Ripple employee
PX 596	Email chain dated March 21, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 599	Email chain dated November 22, 2017	Redactions	Identity or contact information of Ripple employee; Ripple contact information
PX 600	Email chain dated December 23, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 601	Email dated July 18, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 602	Email chain dated January 16, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 603	Email chain dated February 20, 2017	Redactions	Identity or contact information of Ripple employee
PX 604	Email chain dated April 10, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 605	Email chain dated October 2, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 606	Email dated January 1, 2018	Redactions	Identity or contact information of third party
PX 607	Email chain dated January 17, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 608	Email dated January 18, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 609	Email dated October 19, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 610	Email dated April 1, 2015, attaching agreement between Larsen and counterparty	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address; Personal financial information of individual defendants; Personal financial information of non-parties; PII; Financial and pricing terms of contracts with third parties
PX 611	Email chain dated October 13, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 612	Agreement between Larsen and counterparty, dated January 24, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 613	Email chain dated October 4, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties



## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 614	Agreement between Larsen and counterparty, dated October 4, 2017	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal familial information
PX 615	Agreement between Garlinghouse and counterparty, dated December 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 616	Email chain dated October 8, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 617	Email chain dated October 14, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 618	Email chain dated October 16, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties; Ripple contact information
PX 619	Email chain dated October 13, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 620	Email chain dated January 29, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 621	Second Amended Rebuttal Report of SEC Expert No. 1, dated February 24, 2022	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
PX 624	Deposition transcript of Lawrence Angelilli, dated August 3, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 625	Email chain dated April 15, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 626	ODL Account Review Presentation, dated April 13, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 629	Agreement between Ripple and Third Party, dated December 31, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 630	Email chain dated January 13, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 631	Email chain dated August 24, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 632	Email chain dated March 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 633	Email chain dated August 25, 2020	Redactions	Identity or contact information of Ripple employee
PX 639	Memorandum by third party, dated February 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 640	Email chain dated June 15, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 641	Transcript of Internal Ripple Company Meeting held on February 5, 2018	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 642	Transcript of Internal Ripple Company Meeting held on September 11, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 643	Transcript of Internal Ripple Company Meeting held on April 30, 2018	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 644	Transcript of Internal Ripple Company Meeting held on February 4, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 645	Transcript of Ripple Company Meeting, dated on or around July 20, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 646	Email dated October 29, 2020 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement
PX 647	Email dated July 29, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 648	Email dated October 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee;
PX 649	Email chain dated November 18, 2014	Redactions	Ripple confidential and proprietary information
PX 650	Email chain dated May 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 651	Services and Marketing Agreement between Ripple and counterparty., dated November 1, 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 652	Option to Purchase XRP, issued to counterparty, dated September 26, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; PII
PX 653	Amended and Restated Option to Purchase XRP, issued to counterparty, dated September 3, 2018	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; PII
PX 654	Email chain dated May 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 655	Email chain dated January 31, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 656	Ripple Presentation, dated April 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 657	Series Seed Preferred Stock Purchase Agreement between Ripple and counterparty, dated November 1, 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 658	Ripple Finance Team Memo	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party

Document	Document Description	Sealing Request	Sealing Basis
PX 659	Ripple Presentation, dated August 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 660	Programmatic Market Activity Agreement between Ripple and counterparty, dated August 23, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 661	Market Maker and Programmatic Market Activity Agreement between Ripple and counterparty, dated February 14, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 662	Amendment to Programmatic Market Activity Agreement between Ripple and counterparty, dated March 1, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 663	Programmatic Market Activity Agreement between Ripple and counterparty, dated June 2, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 667	Email chain dated May 6, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 669	Minutes of a Meeting of the Compensation Committee of the Board of Directors of Ripple Labs, dated April 25, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 672	Email chain dated October 11, 2020	Sealed In Entirety	Identity or contact information of third party; Identity or contact information of Ripple employee; Employee compensation terms; Personal financial information of individual defendants
PX 674	Presentation dated April 22, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 675	Email chain dated January 23, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 676	XRP Exchanges	Redactions	Identity or contact information of third party
PX 677	2014 XRP II Sales: Geographic Concentration	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 682	Ripple Presentation, XRP Ledger Decentralization, dated December 17, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 684	Garlinghouse XRP Sales Spreadsheet	Sealed In Entirety	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants
PX 685	Larsen Transaction History	Sealed In Entirety	Personal financial information of individual defendants
PX 686	Third Party Account Information	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 687	Third Party Transaction Report	Sealed In Entirety	Personal financial information of individual defendants
PX 688	Email chain dated March 22, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers
PX 690	Email chain dated June 1, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 691	Email chain dated May 17, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address; Personal financial information of individual defendants
PX 692	Email dated May 20, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 693	Email chain dated September 11, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 694	Email chain dated February 18, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 695	Third Party Investment Memo, dated January 2020	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 696	Q3 2019 Board Back Update	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 697	Email chain dated June 30, 2018	Redactions	Identity or contact information of third party
PX 698	Email dated February 6, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 699	Email chain dated July 3, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 703	XRP Programmatic Sales Reporting FY14 to Date, as of September 2019	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 704	XRP Distributions Report	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 705	XRP Distributions Report	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 706	Email chain dated November 28, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 707	Expert Report of Alan Schwartz, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 709	Email dated November 15, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 710	Email dated November 21, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 711	Email dated June 2, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 712	Email dated November 25, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 713	Email dated November 4, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 715	Expert Report of Allen Ferrell, Ph.D., dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 716	XRP EUR Volume Incentive Program Agreement between Ripple and counterparty, dated January 13, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 717	XRP Fee Rebate Program Agreement between Ripple and counterparty, dated October 4, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 718	XRP Volume Incentive Program Agreement between Ripple and counterparty, dated June 1, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 719	XRP Fee Rebate Program Agreement between Ripple and counterparty, dated May 22, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 720	XRP Listing, Volume Incentive and Rebate Agreement between Ripple and counterparty, dated May 17, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 721	XRP Volume Incentive Program Agreement between Ripple and counterparty, dated May 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 722	XRP Volume Incentive and Fee Rebate Program Agreement between Ripple and counterparty, dated October 30, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 724	Email dated February 12, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 725	Email dated August 30, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers; Digital wallet address; Personal financial information of individual defendants; Personal Familial Information
PX 726	Email dated September 4, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers; Digital wallet address; Personal financial information of individual defendants
PX 727	Email dated May 14, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 728	Email dated August 11, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 729	Email dated September 24, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 730	Email dated December 2, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 731	Email dated December 18, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 732	Third party communications with Larsen	Sealed In Entirety	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address; Personal financial information of individual defendants
PX 733	Email dated August 25, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 734	Email dated May 21, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 735	Memorandum of Understanding between Ripple and counterparty, dated January 28, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 736	Joint Venture Agreement between Ripple and counterparty, dated March 30, 2016	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 737	Master XRP Custody Agreement between Ripple and counterparty, dated August 28, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 738	Development and Integration Agreement between Ripple and counterparty, dated November 8, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 739	Ripple Labs Charitable Contributions in XRP, dated January 23, 2020	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 740	Email chain dated March 20, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 741	Email chain dated June 16, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
PX 742	Ripple's Responses and Objections to Plaintiff's Third Set of Requests for Admission	Redactions	Identity or contact information of third party
PX 746	Consolidated Financial Statement as of December 31, 2014 and 2013	Sealed In Entirety	Confidential information from Ripple financial statements
PX 747	Consolidated Financial Statement as of December 31, 2015 and 2014	Sealed In Entirety	Confidential information from Ripple financial statements
PX 748	Consolidated Financial Statement as of December 31, 2017 and 2016	Sealed In Entirety	Confidential information from Ripple financial statements
PX 749	Consolidated Financial Statement as of December 31, 2018 and 2017	Sealed In Entirety	Confidential information from Ripple financial statements
PX 750	Consolidated Financial Statement as of December 31, 2019 and 2018	Sealed In Entirety	Confidential information from Ripple financial statements
PX 751	Consolidated Financial Statement as of December 31, 2020 and 2019	Sealed In Entirety	Confidential information from Ripple financial statements
PX 752	Ripple spreadsheet re: executive compensation	Sealed In Entirety	Confidential information from Ripple financial statements
PX 753	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 754	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 755	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 756	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 757	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 758	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 759	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 760	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 761	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 762	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 763	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 765	Brad Garlinghouse XRP Sales August-December 2020	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of third party
PX 769	Master XRP Market Maker Services Agreement between Ripple and counterparty, dated July 1, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 770	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated September 17, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party

Document	Document Description	Sealing Request	Sealing Basis
PX 771	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated September 5, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
ECF No. 728-2 PX 403	Email chain dated January 5, 2015	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
ECF No. 728-3 PX 534	Email chain dated June 3, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
ECF No. 728-4 PX 553	Email chain dated October 3, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
ECF No. 728-5 PX 664	Email chain dated July 19, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
ECF No. 728-6 PX 671	Text messages dated January 13, 2018	Redactions	Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
ECF No. 723	Defendants' Reply in Support of Motion for Summary Judgment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
ECF No. 623	Defendants' Statement of Undisputed Material Facts	Redactions	Identity or contact information of third party
ECF No. 663	Defendants' Responses to Plaintiff's Local Rule 56.1 Statement and Statement of Additional Material Facts Pursuant to Local Rule 56.1(b) in Opposition to Plaintiff's Motion for Summary Judgment	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Familial Information
ECF No. 724	Defendants' Responses to Plaintiff's Counter-Statement of Undisputed Facts Pursuant to Local Rule 56.1(b)	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Familial Information
ECF No. 624	Declaration of Michael K. Kellogg in Support of Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 664	Declaration of Christopher S. Ford in Support of Defendants' Opposition to Plaintiff's Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 665	Declaration of Erol Gulay in Support of Defendants' Opposition to Plaintiff's Motion for Summary Judgment	Redactions	Identity or contact information of third party
ECF No. 725	Declaration of Erol Gulay in Support of Defendants' Reply in Support of Motion for Summary Judgment	Redactions	Identity or contact information of third party
Exhibit 001	Deposition Transcript of David Schwartz, dated May 26, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
Exhibit 002	Declaration of David Schwartz, dated September 13, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 004	Deposition Transcript of Dinuka Samarasinghe, dated June 9, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties; Employment history of non-parties
Exhibit 006	Deposition Transcript of Phillip Rapoport, dated July 22, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 008	Deposition Transcript of Christian A. Larsen, dated September 14, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants; Personal financial information of non-parties; Personal Familial Information; Personal Financial Holding
Exhibit 009	Deposition Transcript of Asheesh Birla, dated June 23, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties
Exhibit 010	Deposition Transcript of Miguel Vias, dated June 28, 2021	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 011	Expert Report of Allen Ferrell, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 012	Expert Rebuttal Report of Allen Ferrell, dated November 12, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 013	Ripple, XRP, and the XRP Ledger presentation, dated May 10, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers; Digital wallet address
Exhibit 014	Declaration of Christian A. Larsen, dated September 9, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 015	Email chain dated December 21, 2017 and attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 016	Agreement with Arthur Britto, dated September 17, 2012	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 017	Declaration of Bradley Garlinghouse, dated September 13, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 019	Third-Party and XRP Markets Team presentation	Redactions	Identity or contact information of third party
Exhibit 020	Declaration of Monica Long, dated September 13, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 021	Deposition Transcript of Ethan Beard, dated August 24, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 022	Deposition Transcript of Ryan Zagone, dated July 20, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 024	Deposition Transcript of Monica Long, dated June 17, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 025	Deposition Transcript of Third Party, dated August 11, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 026	Plaintiff's Answers & Objections to Defendants' Third Set of Requests for Admission	Redactions	Highly confidential/sensitive/proprietary business information
Exhibit 027	Deposition Transcript of Patrick Griffin, dated June 29, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 028	Deposition Transcript of Lawrence Angelilli, dated August 3, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 029	Email chain dated July 6, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 030	Deposition Transcript of Alan Schwartz, dated February 11, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 031	XRP/EUR Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 032	XRP Fee Rebate Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 033	XRP Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 034	Fee Rebate Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 035	XRP Listing, Volume Incentive and Rebate Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 036	XRP Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 037	XRP Volume Incentive and Fee Rebate Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 038	Deposition Transcript of Breanne Madigan, dated May 18, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 039	Plaintiff's Supplemental Responses & Objections to Defendant Ripple Labs Inc.'s Interrogatories Nos. 1, 2, 3, 6, 7, 11, 17, 18, 19, 22, 23, and 24	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 040	Expert Report of Alan Schwartz, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 043	Programmatic Market Activity Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 044	Amendment to Programmatic Market Activity Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 045	Master XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 046	XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
Exhibit 047	Master XRP Commitment to Sell Agreement between Ripple Services Inc., XRP II, LLC, and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 048	Master XRP Loan to Purchase Agreement between XRP II, LLC and counterparty	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 049	Ripple Currency Wholesale Sales Invoice between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address; PII
Exhibit 050	Ripple Currency Purchase Letter of Intent between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 051	Ripple Currency Wholesale Sales Order between XRP Fund II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 052	Master XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 053	Market Making Agreement between Ripple Markets, Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 054	Master XRP Lease Agreement between Ripple Payments Inc., XRP II, LLC, and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 055	Market Making Agreement between Ripple Markets, Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 056	On Demand Liquidity Incentive #1 between Ripple Services Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 057	Pilot Agreement between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 058	Employment Offer Letter for Ripple employee	Redactions	Employee compensation terms; Identity or contact information of Ripple employee
Exhibit 059	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 060	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 061	Agreement between Ripple and third party	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 062	Digital Asset Loan Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 063	Custody Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee



Document	Document Description	Sealing Request	Sealing Basis
Exhibit 064	Master XRP Custody Agreement between Ripple Labs Inc. and counterparty	Redactions	Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 065	XRP Transfer Request between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
Exhibit 066	Settlement Agreement and Release between Ripple Labs and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 067	Amended and Restated Option to Purchase XRP between XRP II LLC and counterparty	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 068	Technology Provider Agreement between Ripple Labs, Inc. and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 069	Option to Purchase XRP between XRP II LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 070	Summary of XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 071	Confidential Binding Letter of Intent to Enter Settlement Agreement between Ripple Labs Inc. and counterparty	Sealed In Entirety	Financial terms of confidential settlement agreement; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 072	Settlement and Release Agreement between XRP II LLC and counterparty	Sealed In Entirety	Financial terms of confidential settlement agreement; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 073	Development and Integration Agreement between Ripple Labs Inc. and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 075	Email dated November 1, 2016	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information
Exhibit 076	Deposition Transcript of Bradley Garlinghouse, dated September 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third-party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
Exhibit 077	Investigative Testimony Transcript of Bradley Garlinghouse, dated September 10, 2020	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
Exhibit 078	Brad Garlinghouse Employment Offer Letter	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 079	Notice of XRP Unit Bonus Award to Brad Garlinghouse, December 13, 2016	Redactions	Employee compensation terms; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 080	Notice of XRP Ledger Address Award, to Brad Garlinghouse, May 29, 2019	Redactions	Employee compensation terms; Digital wallet address
Exhibit 081	Chris Larsen XRP Sales By Exchange (2017-2020)	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 082	Bradley Garlinghouse XRP Sales By Exchange (2017-2020)	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 083	Plaintiff's Answers & Objections to Defendants' Fifth Set of Requests for Admission	Redactions	Identity or contact information of third party
Exhibit 084	Letter from SEC to Cayman Islands Monetary Authority, dated April 6, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 085	Letter from SEC to Hong Kong Securities and Futures Commission, dated April 8, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 086	Letter from SEC to Financial Services Commission of the Republic of Korea, dated March 17, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 087	Summary of Christian Larsen's XRP sales in 2017 and before	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Personal Financial Information
Exhibit 088	Letter from SEC to United Kingdom Financial Conduct Authority, dated March 17, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 089	Letter from SEC to Cayman Islands Monetary Authority, dated March 22, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 090	Letter from SEC to the Monetary Authority of Singapore, dated March 18, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 091	Digital asset exchange account access reset request	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Personal financial information of individual defendants
Exhibit 092	Letter from SEC to the Malta Financial Services Authority, dated March 22, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 093	Letter from SEC to the Securities Commission of Malaysia, dated May 21, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 094	Letter from SEC to the Comision Nacional Bancaria y de Valores, dated February 3, 2021	Redactions	Identity or contact information of third party
Exhibit 095	Letter from SEC to the Gibraltar Financial Services Commission, March 2, 2021	Redactions	Identity or contact information of third party
Exhibit 096	Letter from SEC to the Commission de Surveillance du Secteur Financier, dated May 21, 2021	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 097	Loan and Purchase Agreement between Christian Larsen-affiliated trust and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 098	Continuing Liquidity Extraction Agreement between Christian Larsen-affiliated trust and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Personal Financial Information

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 099	Continuing Liquidity Extraction Agreement between Christian Larsen-affiliated trust and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Financial Information; PII
Exhibit 100	Liquidity Extraction Agreement between Bradley Garlinghouse and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 101	Email chain dated August 11 and December 2, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 102	Record of Christian Larsen's charitable donations	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 103	Plaintiff's Responses & Objections to Ripple's First Set of Interrogatories	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 105	Expert Rebuttal Report of SEC Expert No. 1, dated November 12, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
Exhibit 106	Second Amended Expert Rebuttal Report of SEC Expert No. 1, dated February 24, 2022	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
Exhibit 110	Email dated October 28, 2013 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 114	Email chain dated May 4, 2018	Redactions	Identity or contact information of Ripple employee
Exhibit 115	Email dated June 26, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
Exhibit 117	Email chain dated October 14-15, 2017	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 118	Text message dated September 27, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 119	Text message dated September 27, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 120	Text message dated October 4, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 121	Text message dated October 4, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 122	Text message dated October 10, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 123	Text message dated October 10, 2019	Redactions	Identity or contact information of Ripple employee
Exhibit 124	Text message dated January 10, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 125	Text message dated January 10, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 126	Text message dated February 28, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 127	Text message dated February 28, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 128	Text message dated April 10, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 129	Text message dated April 10, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 130	Text message dated April 16, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 131	Text message dated April 16, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 132	Email chain dated October 11-13, 2013	Redactions	Identity or contact information of Ripple employee
Exhibit 133	Market Maker and Programmatic Market Making Activity Agreement between Ripple Markets and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 134	Plaintiff's First Set of Requests for Admission to Defendant Ripple Labs, Inc.	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 135	Errata Sheet for the Deposition of Christian Larsen dated October 25, 2021	Redactions	Employee compensation terms; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 137	Email chain dated July 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 146	Email chain dated December 7-8, 2017 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 147	Document production cover letter by third party respondent, dated September 14, 2021	Redactions	Identity or contact information of third party
Exhibit 158	Plaintiff's Answers and Objections to Defendants' Fourth Set of Requests for Admission	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 159	Plaintiff's Amended Answers and Objections to Defendants' Fourth Set of Requests for Admission Pursuant to Order Dated July 19, 2022	Redactions	Identity or contact information of third party
Exhibit 163	Email chain dated November 2-3, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 165	Email chain dated October 2020	Redactions	Identity or contact information of third party
Exhibit 166	Email chain dated December 2015	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 167.01	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.02	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.03	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.04	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.05	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.06	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.07	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.08	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.09	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.10	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.11	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.12	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.13	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.14	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.15	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.16	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 167.17	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.18	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.19	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.20	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.21	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.22	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.23	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.24	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.25	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 167.26	Affidavits by XRP holders	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 169	Declaration of Christian A. Larsen, dated October 18, 2022	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 170	Declaration of Kristina Campbell, dated October 16, 2022.	Redactions	FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 171	Expert Report of Peter Easton, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 172	Email chain dated November 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 180	Email chain dated October 30-November 1, 2013 with attachment	Redactions	Identity or contact information of Ripple employee
Exhibit 181	Email chain dated October 28, 2013 with attachment	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 186	Settlement Agreement between the U.S. Department of Justice and Ripple Labs Inc., dated May 5, 2015	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 187	Assessment of Civil Monetary Penalty by the Financial Crimes Enforcement Network against Ripple Labs Inc., dated May 5, 2015	Redactions	Identity or contact information of third party
Exhibit 192	"Petition Regarding Rulemaking on Digital Assets" submitted by third party to SEC	Redactions	Identity or contact information of third party
Exhibit 201	Email chain dated March 14, 2017 with attachment	Redactions	Identity or contact information of third party
Exhibit 202	"Securities Law Analysis" submitted by third party to SEC	Redactions	Identity or contact information of third party
Exhibit 203	Email chain dated December 2017	Redactions	Identity or contact information of third party
Exhibit 204	"Selling Consumer Tokens in a Consumer-Protective Manner" presentation prepared by third parties	Redactions	Identity or contact information of third party
Exhibit 205	Email chain dated December 2017 with attachment	Redactions	Identity or contact information of third party
Exhibit 213	"Securities Law Analysis" submitted by third party to SEC	Redactions	Identity or contact information of third party
Exhibit 214	Email dated November 15, 2018	Redactions	Identity or contact information of third party
Exhibit 215	Email chain dated November 2018 with attachment	Redactions	Identity or contact information of third party
Exhibit 217	Legal analysis submitted by third party to SEC, dated October 31, 2018	Redactions	Identity or contact information of third party
Exhibit 219	Email dated February 14, 2019 with attachment	Redactions	Identity or contact information of third party
Exhibit 220	Legal analysis submitted by third party to SEC, dated April 8, 2019	Redactions	Identity or contact information of third party
Exhibit 228	Presentation by third party to SEC, dated December 15, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 229	Email dated February 14, 2019 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 230	Memo prepared by counsel for third party, dated November 14, 2019	Redactions	Identity or contact information of third party
Exhibit 231	Response by third party to SEC comment letter, dated December 28, 2017	Redactions	Identity or contact information of third party
Exhibit 232	Summary of XRP Purchase by counterparty from XRP II, LLC	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 236	Calendar invitation dated January 29, 2018	Redactions	Identity or contact information of third party
Exhibit 238	Email dated August 7, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 251	Expert Report of Bradley Borden, dated October 4, 2021	Redactions	Identity or contact information of third party
Exhibit 252	Email chain dated May 14, 2015	Redactions	Identity or contact information of Ripple employee
Exhibit 253	Email dated August 7, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 254	Email dated June 18, 2020	Redactions	Identity or contact information of Ripple employee
Exhibit 255	Email dated June 21, 2020	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 256	Letter from Ripple Labs Inc. to third party, dated January 11, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 257	Email chain dated April 3, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 258	Email chain dated November 11, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 259	Email dated January 12, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 263	Email dated November 11, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 266	Email dated April 19, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 269	Email dated October 14, 2018	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 270	Transcript of Recording of Internal Ripple Company Meeting	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 271	Transcript of Recording of Internal Ripple Company Meeting	Redactions	Identity or contact information of Ripple employee
Exhibit 272	Document production cover letter by third party respondent, dated September 14, 2021	Redactions	Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 273	Digital asset exchange account information of Bradley Garlinghouse	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address

Appendix A

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 275	Plaintiffs' Answers & Objections to Defendants' Third Set of Requests for Admission	Redactions	Identity or contact information of third party
Exhibit 278	Response by third party to SEC letter, dated April 16, 2018	Redactions	Identity or contact information of third party
Exhibit 284	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 286	Agreement between Ripple and third party	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 287	Agreement between Ripple and third party	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 288	Email chain dated August 21, 2019	Redactions	Identity or contact information of third party; Digital wallet address
Exhibit 289	Email chain dated June 17, 2019 with attachment	Redactions	Identity or contact information of third party
Exhibit 290	Agreement between Ripple and third party	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 295	Email chain dated October 15, 2019	Redactions	Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address

# Exhibit A

**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)

**DECLARATION OF KRISTINA CAMPBELL**

I, Kristina Campbell, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Chief Financial Officer (“CFO”) of Ripple Labs Inc. (“Ripple” or the “Company”) and have held this position since April 2021. I submit this Declaration in support of Ripple’s Letter-Motion to Seal (the “Motion”) certain exhibits and other documents filed in connection with the parties’ Motions for Summary Judgment (“Summary Judgment Materials”). The facts stated herein are true to the best of my knowledge.

2. I have over 20 years of experience in finance operations and business strategy with a focus on fintech and payments.

3. In my capacity as Ripple’s CFO, I am the Company’s most senior financial officer. I report to Ripple’s Chief Executive Officer (“CEO”) and I advise the CEO and Board of Directors on the Company’s financial condition and financing efforts. I oversee a team of finance and accounting professionals, who report to me. As CFO, I am primarily responsible for, among other things, preparing reports of the Company’s financial condition, including balance



sheets and cash flow statements; generating financial forecasts and models of anticipated revenues and expenses; securing financing from equity and debt investors; investor relations; and reporting information to Ripple's independent auditors to prepare the Company's annual audited financial statements.

4. I am familiar with the Summary Judgment Materials that reflect Ripple's highly confidential financial information. I submit this declaration to support those redactions Ripple proposes that fall into three categories: (i) certain financial figures in or derived from Ripple's non-public audited financial statements; (ii) highly sensitive and confidential financial terms of Ripple's contracts with third parties; and (iii) highly sensitive and confidential information from Ripple's internal financial reports and forecasts regarding its business strategies and lines of business.

5. Ripple is a private company. Ripple undertakes significant efforts to protect the confidentiality of its sensitive and proprietary business information. Based on my review and my personal knowledge and experience as Ripple's CFO and as a professional for over 20 years, I attest that the information Ripple seeks to redact is highly sensitive and confidential business and proprietary information. Its disclosure to the public would be detrimental to Ripple's business relationships with customers and other counterparties and harm Ripple's competitive standing in the marketplace.

**A. Information Derived from Ripple's Non-Public Audited Financial Statements**

6. The portions of the Motion and exhibits thereto that I have reviewed reveal highly confidential financial information derived from and related to Ripple's audited financial statements, including complete copies of the financial statements themselves for several fiscal years, which have never been made public before. These documents reveal Ripple's confidential

balance sheet, revenue and expense figures, pricing, costs, revenue, and profit information about Ripple's prior and existing business lines, investments in third party entities, unrelated litigation expenses and settlements, and other non-public financial and business information.

7. As a private company, Ripple's financial statements are confidential and the Company takes substantial measures to safeguard its audited financial statements from public disclosure. The company does not disclose this information to third parties, except under limited circumstances. Indeed, Ripple only provides these financial statements to certain large shareholders, who are bound by confidentiality agreements, as well as to select prospective investors, major vendors conducting necessary due diligence, or insurance underwriters, pursuant to non-disclosure agreements to protect the confidential nature of these materials.

8. Public disclosure of Ripple's financial statements, and certain information contained therein, would be highly detrimental to Ripple's business because it would reveal detailed information about Ripple's financial condition, long term business plans, and revenue streams and expense structures to the marketplace, including Ripple's competitors, business partners, customers and prospective customers, and the public. The revelation of this material may also damage relationships with Ripple's existing or prospective investors, customers, vendors, and partners who may similarly want to maintain the confidentiality of these figures.

9. Therefore, Ripple seeks to narrowly redact certain references to Ripple's financial statements in the Summary Judgment Materials, and to seal copies of the financial statements themselves, as identified in **Appendix A** hereto.

**B. Information Concerning Ripple's Contracts with Third Parties**

10. Certain of the Summary Judgment Materials reference Ripple's confidential agreements with third parties and reveal the specific terms of those contractual agreements.

Some exhibits are copies of the business agreements themselves, notwithstanding that the agreements typically contain confidentiality provisions, relate to current and ongoing business relationships, and have never before been made public.

11. The proposed redactions and sealing requests in this category are limited to redacting the names of certain counterparties and certain negotiated contractual terms that are confidential and highly sensitive. Those terms and counterparty names are not already in the public realm. Rather, this is proprietary information regarding Ripple's relationships with existing customers and business partners, and regarding Ripple's pricing and business strategies.

12. In certain narrow cases, Ripple has proposed to seal the contractual agreement in its entirety, where the agreement reflects an ongoing contractual relationship with one of Ripple's current business partners and contains confidentiality provisions preventing disclosure. Disclosure of these contracts would be detrimental to Ripple's business because it would harm its relationships with its business partners—which expect Ripple to abide by the confidentiality provisions of its contracts—and reveal the terms of Ripple's existing business arrangements to Ripple's competitors.

13. Ripple regards the financial terms in its contracts with third parties as highly confidential and takes several measures to safeguard this information from public disclosure. For example, Ripple's contracts with third parties contain confidentiality provisions; the information is not known outside of Ripple; the information was never disclosed to third parties, except pursuant to agreements to keep such information confidential; and Ripple prohibits employees from disseminating such information externally and instructs its employees to maintain this information on a "need to know" basis within the company.

14. Revealing the specific information to which Ripple has narrowly proposed redactions would allow Ripple's competitors to use it to their advantage and Ripple's detriment, thus harming Ripple's competitive standing. In most cases, Ripple has not proposed broad redactions of the contract terms, but rather has proposed narrow redactions just of particular terms (such as an interest rate, or the specific amount of XRP) that are business-sensitive.

15. I know from my role as CFO that Ripple's relationships with existing and prospective customers and business partners have already been challenged by the SEC's enforcement action. Publicizing those counterparty names and specific deal terms may further challenge those relationships and potentially chill future business opportunities.

16. Ripple's existing business relationships and competitive standing could also be seriously harmed by revealing to the marketplace the specific financial and pricing terms that Ripple and certain of its past or existing counterparties negotiated. Public disclosure of the confidential financial terms of Ripple's contracts with third parties would reveal confidential sales and pricing information and uncover Ripple's sales, marketing, and pricing strategies, which are highly confidential and proprietary business information. This information, if made public, would imperil Ripple's existing and prospective business relationship with these counterparties.

17. The financial terms of Ripple's contracts with third parties and the sales, marketing, and pricing strategies they reflect, are valuable to Ripple because they were developed at substantial cost using significant resources. For example, these contracts were heavily negotiated by Ripple's business and legal professionals, including outside counsel, and reflect efforts by sales and marketing professionals to procure and develop business relationships with customers and other partners. If this information were made public, potential counterparties

may approach future negotiations with Ripple with full knowledge of Ripple's bargaining positions in its rival business relationships, thus giving these counterparties an unfair advantage over Ripple, which they might leverage to seek, for example, more favorable terms that Ripple provided to other counterparties.

18. Disclosure of the financial terms of Ripple's contracts would also be detrimental to Ripple's competitive standing in the marketplace. Ripple competes with other companies in the fintech space to secure and develop business partnerships with financial institutions, payment providers, market makers, equity investors, and digital asset exchanges. If the financial terms of Ripple's contracts became public, Ripple's competitors in the marketplace could leverage this information to undercut Ripple in future negotiations with Ripple's existing and prospective counterparties by offering such counterparties more attractive financial terms than what Ripple offers to its counterparties. Ripple's competitors may also use this information to adjust their business plans, pricing policies, and sales and marketing efforts to gain a competitive advantage over Ripple in the marketplace.

19. The disclosure of the financial terms of Ripple's contracts with third parties may significantly harm Ripple's commercial reputation. If counterparties (such as customers and investors) do not trust Ripple's ability to maintain the confidentiality of their non-public commercial and financial information, these parties may be unwilling to provide Ripple with sensitive information in future negotiations, or simply transact with one of Ripple's competitors.

20. For these reasons, the proposed redactions to the names of certain counterparties and certain negotiated contractual terms identified in **Appendix A** hereto are critical to Ripple's business partnerships and competitive standing.

**C. Internal Financial Reports and Forecasts**

21. The Summary Judgment Materials reference, and in some cases attach copies of, highly confidential internal financial reports and projections prepared by Ripple's finance and accounting teams. These documents include, for example, Ripple's annual plans that are presented to the Board of Directors and reflect non-public information about Ripple's financial condition, business strategies, and long-term plans, and which are designed to inform the Board's oversight and decision-making functions. These documents also include, or reference, reports of the Company's financial condition, including with respect to revenues, expenses, and lines of business, and financial forecasts and models of anticipated revenues and expenses.

22. These materials have never been made public before and reflect highly confidential and proprietary information about Ripple's current, forecasted, or recent financial condition, business strategy, and long-term business plans. For example, the documents contain detailed and proprietary information about Ripple's revenue streams, expense structures, sales, marketing, and pricing strategies and other information about Ripple's prior and existing business lines. Revelation of this highly confidential information to the public would cause material harm to Ripple's business, competitive standing, relationships with investors, and ability to compete for and secure business partnerships and customers.

23. Ripple's business would be substantially harmed if its current business strategies and long-term business plans were disclosed to the public, including to its competitors. Revelation of such information would give fintech industry participants a competitive advantage over Ripple, allowing them to develop strategies that anticipate and outcompete Ripple in its customer relationships, pricing strategies, and business partnerships. Simply put, Ripple's competitive standing would be significantly harmed if confidential information about its



financial condition, business strategies, and the revenues, costs, and expenses associated with its business lines were disclosed.

24. For example, I understand that the Summary Judgment Materials contain highly confidential information about the costs and expenses incurred by Ripple in connection with its On-Demand Liquidity (“ODL”) product. This information is highly sensitive and, if revealed, would harm Ripple’s relationships with existing and prospective ODL partners and allow Ripple’s competitors in the cross-border payment marketplace to adjust their business plans and pricing policies and gain a competitive advantage over Ripple.

25. The Summary Judgment Materials also contain highly confidential information about Ripple’s current and proposed future plans regarding its XRP escrow strategy. Disclosure of this information, which itself is subject to change, would harm Ripple’s standing in the fintech marketplace.

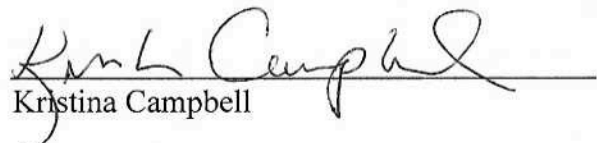
26. I also understand that certain of Ripple’s business bank account statements have been attached as exhibits to the SEC’s Motion for Summary Judgment. These documents are highly sensitive and confidential and Ripple’s business and customer and investor relationship would be substantially harmed by their disclosure.

27. For these reasons, the proposed redactions to information from Ripple’s internal financial reports identified in **Appendix A** hereto are critical to Ripple’s business and competitive standing.

I declare under penalty of perjury that the forgoing is true and correct.

Dated: December 19, 2022  
Los Angeles, CA

By:

  
Kristina Campbell

RIPPLE LABS INC.

# Appendix A

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
ECF No. 726	Plaintiff SEC's Reply Memorandum of Law in Further Support of its Motion for Summary Judgment	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants
ECF No. 629	Plaintiff SEC's Local Rule 56.1 Statement in Support of Its Motion for Summary Judgment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers
ECF No. 668	Plaintiff SEC's Response and Counter-Statement to Defendants' Local Rule 56.1 Statement in Opposition to Defendants' Motion for Summary Judgment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers
PX 002	Deposition Transcript of Christian A. Larsen, dated September 14, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants; Personal financial information of non-parties; Personal Familial Information; Personal financial holdings
PX 003	Investigative Testimony of Patrick A. Griffin	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 004	Information Regarding XRP II, LLC's History and Business	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 005	Instructions For License to Engage in Virtual Currency Business Activity	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 006	Deposition Transcript of David Schwartz, dated May 26, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
PX 008	Responses and Objections of Defendant Ripple Labs to Plaintiff's First Set of Requests for Admissions	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 010	Deposition Transcript of Phillip Rapoport, dated July 22, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 013	Expert Rebuttal Report of SEC Expert No. 1, dated November 12, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
PX 015	Deposition Transcript of Asheesh Birla, dated June 23, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties
PX 016	Investigative Testimony of Asheesh Birla	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 020	Deposition Transcript of Miguel Vias, dated June 28, 2021	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 021	Investigative Testimony of Miguel Vias	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 022	Deposition Transcript of Dinuka Samarasinghe, dated June 9, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties; Employment history of non-parties
PX 023	Deposition of Ron Will	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 024	Deposition Transcript of Ethan Beard, dated August 24, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 025	Deposition Transcript of Breanne Madigan, dated May 18, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 026	Deposition Transcript of Third Party, dated August 11, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information
PX 027	Email chain dated January 10, 2020 and attachment	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 033	Email chain dated July 30, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 035	Email chain dated June 1, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 036	Investigative Testimony Transcript of Bradley Garlinghouse, dated September 10, 2020	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
PX 037	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 038	Email dated April 19, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 040	Email dated January 7, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 041	Email chain dated December 12, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 042	Email dated November 21, 2016 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 043	Email dated March 28, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 044	Email chain dated November 24, 2013	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 045	Declaration of Chris Ferrante	Redactions	Confidential information from Ripple financial statements; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 046	Email chain dated March 28, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 047	Email dated January 31, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 048	Chats dated January 8, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 050	Email chain dated January 2, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 051	Email chain dated April 3, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 052	Email dated May 9, 2013 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 054	Email dated July 19, 2013 and attachments	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 055	Email chain dated June 10, 2014 and attachments	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 058	Email chain dated July 22, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 066	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 072	Email chain dated June 25, 2014 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 081	Deposition Transcript of Bradley Garlinghouse, dated September 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third-party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
PX 083	Email dated April 4, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 085	Responses and Defenses of Ripple to Plaintiff's Second Set of Requests for Admission	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 087	Email chain dated June 24, 2015 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 093	Email dated January 18, 2018 and attachments	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 097	Email chain dated September 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 098	Email chain dated November 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 099	Email dated March 27, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 100	Email chain dated August 1, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 103	Email dated April 21, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 104	Email dated May 2, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 105	Email dated April 30, 2017 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 106	Email chain dated May 4, 2017 and attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 112	Email chain dated May 8, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 114	Email dated June 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 115	Email dated May 1, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of Ripple employee
PX 116	Email dated May 16, 2017	Redactions	Highly confidential/sensitive/proprietary business information
PX 117	Email chain dated November 27, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 130	Email chain dated April 29, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 131	Email chain dated April 8, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee

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Document	Document Description	Sealing Request	Sealing Basis
PX 133	Email chain dated May 1, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 138	Email chain dated October 15, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 139	Text message dated November 3, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 141	Email chain dated July 28, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 143	Email chain dated March 21, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 146	Email chain dated June 26, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 150	Email chain dated November 30, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 151	Email chain dated November 21, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 154	Email chain dated July 5, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 155	Email dated April 2, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 156	Email chain dated April 15, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 157	Email chain dated August 19, 2016 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 164	Email chain dated May 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 165	Email chain dated October 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 168	Information Regarding XRP II, LLC's History and Business	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party
PX 169	Letter Response by Counsel to Inquiry from the New York State Department of Financial Services, dated March 9, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 170	Email chain dated April 22, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 171	Email chain dated September 20, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 172	Email chain dated May 30, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 176	Email chain dated April 20, 2020 with attachment	Sealed in Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements
PX 177	Email dated April 23, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 180	Standalone table with Quarterly XRP Sales	Redactions	Confidential information from Ripple financial statements
PX 182	Email chain dated January 10, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 183	Email dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 184	Email dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 186	Email chain dated June 23, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 189	Email chain dated November 24, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 190	Email dated July 21, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 192	Email chain dated October 14 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 195	Email chain dated September 6, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 199	Email dated August 21, 2020 with attachments	Redactions	Confidential information from Ripple financial statements; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 202	Amended Expert Report of SEC Expert No. 3	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 206	Email chain dated December 18, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 211	Master XRP Purchase Agreement between Ripple Labs Inc. and counterparty, dated September 24, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 212	Chart showing XRP sales to third party between 2/20/2019 and 4/24/2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 215	Board Minutes dated December 13, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 221	Email dated February 24, 2013 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)

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Document	Document Description	Sealing Request	Sealing Basis
PX 233	Email dated December 17, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 235	Presentation dated November 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 240	Email chain dated June 22, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 247	Email chain dated July 28, 2015 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 249	Email chain dated October 30, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 273	Email chain dated April 30, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 274	Email chain dated December 16, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 279	Chat dated May 28, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 280	Email chain dated December 23, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 281	Email chain dated July 11, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 286	Ripple Currency Wholesale Sales Order with counterparty, dated March 6, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 287	Ripple Currency Wholesale Sales Order with counterparty, dated April 25, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 288	Ripple Currency Wholesale Sales Invoice with counterparty, dated January 30, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 289	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 290	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 291	Ripple Currency Purchase Letter of Intent with counterparty, dated July 14, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 292	Email withheld for privilege, with attachments	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 293	Email chain dated December 3, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 294	Ripple Currency Purchase Letter of Intent with counterparty, dated May 29, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 295	Ripple Currency Wholesale Sales Invoice with counterparty, dated June 26, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 296	XRP II, LLC bank account information	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Bank account numbers; Digital wallet address
PX 297	Email chain dated August 1, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 298	Email chain dated October 29, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 299	Ripple Currency Purchase Letter of Intent with counterparty, dated July 21, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 300	Summary of XRP Purchase by counterparty from XRP II, LLC, dated June 9, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 301	Summary of XRP Purchase by counterparty from XRP II, LLC, dated July 12, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 303	Summary of XRP Purchase by counterparty from XRP II, LLC, dated August 8, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 309	Email chain dated September 14, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 310	Letter agreement between XRP II, LLC and counterparty, dated September 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 311	Email chain dated August 2, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 312	Private Placement Memorandum of third party, dated August 3, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 313	Chat dated August 2, 2018 through February 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 315	Chat, undated	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 316	Receipt of XRP purchase by counterparty from XRP II, LLC, dated August 9, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee



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Document	Document Description	Sealing Request	Sealing Basis
PX 317	Email chain dated August 9, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Bank account numbers
PX 318	Email chain dated August 8, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 319	Email chain dated August 20, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 320	Email chain dated August 29, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 323	Email dated March 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 324	Letter Agreement between XRP II, LLC and counterparty, dated September 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 325	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 27, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 326	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 28, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 327	Summary of XRP Purchase by counterparty from XRP II, LLC, dated September 29, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 329	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated May 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 330	Summary of XRP Commitment by counterparty, dated May 26, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 331	Receipt of XRP purchase by counterparty from XRP II, LLC, dated May 27, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 333	Redacted email with attachment	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 334	Invoice to counterparty dated August 24, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Ripple contact information
PX 336	Master XRP Commitment to Sell Agreement between Ripple Services Inc. and XRP II, LLC and counterparty, dated May 1, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 337	Summary of XRP Commitment by counterparty, dated June 1, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 338	Receipt of XRP Purchase by counterparty from XRP II, LLC, dated May 29, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
PX 339	Invoice to counterparty, dated June 8, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 340	Receivers Product Story, H2 2020, dated June 16, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 341	Transcription of Recording of RippleNet Sender Product Story, dated September 12, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 342	Email chain dated June 15, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 343	Email chain dated September 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 344	Email chain dated October 24, 2013	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 345	Email chain dated January 19, 2018	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 346	Email dated December 21, 2017 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 347	2019 Annual Plan, dated December 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 348	Financial Forecast presentation, undated	Redactions	Confidential information from Ripple financial statements
PX 349	xRapid Market Maker Status Update, dated March 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 354	Email dated July 2, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 355	Email chain dated June 5, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 356	Email chain dated October 8, 2013 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 357	Email dated October 23, 2018 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 362	Email chain dated April 11, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 363	Email dated March 9, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 364	Email chain dated August 18, 2012 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 365	The Ripple Protocol: A Deep Dive for Finance Professionals, dated September 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 366	Email dated September 12, 2016	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 367	Email chain dated April 22, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 368	Email chain dated September 25, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee

Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 370	Email chain dated May 17, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address
PX 371	Email chain dated December 6, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 372	Email dated December 2, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 373	Email chain dated March 28, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 374	Email chain dated October 16, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 376	Email chain dated October 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 377	Email dated March 1, 2018 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 378	Email chain dated April 9, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 379	Email chain dated April 27, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 380	Email chain dated November 2, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 381	Email chain dated February 22, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 382	Email chain dated April 10, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 383	Email chain dated May 24, 2016 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 386	Email chain dated December 15, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 387	Email chain dated April 10, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 388	Email chain dated February 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 389	Email chain dated May 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Financial Information
PX 390	Email chain dated August 23, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 392	Email chain dated August 3, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 395	Email chain dated February 28, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 398	Declaration of Christopher Ferrante, dated October 18, 2022	Redactions	Confidential information from Ripple financial statements
PX 399	Email chain dated June 12, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 400	Email chain dated June 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 402	Email chain dated September 19, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 404	Email dated May 1, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 405	Email dated October 25, 2013	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 406	Transcript of Recording of Meeting, dated December 14, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 407	Email dated December 15, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 408	Transcript of Recording of Q1 2017 All Hands Meeting, dated April 4, 2017	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 410	Transcript of Recording of Q2 2018 All Hands Meeting, dated July 10, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 412	Chats dated January 27, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 413	Text messages dated June 25, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 417	Transcript of Recording of Q4 2017 All Hands Meeting, dated December 12, 2017	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 422	Transcription of Recording of Weekly Meeting, dated April 22, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 424	Email chain dated June 25, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; Digital wallet address

Document	Document Description	Sealing Request	Sealing Basis
PX 425	Master XRP Purchase Agreement between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 431	Email chain dated May 31, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 432	Email chain dated July 6, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 435	Email chain dated October 11, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 437	Email dated December 1, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 441	Email chain dated September 10, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 442	Wells Submission on Behalf of Ripple Labs	Sealed In Entirety	Highly confidential/sensitive/proprietary business information
PX 447	Declaration of Third Party	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 449	Email chain dated January 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 455	Email chain dated June 9, 2020	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 456	Email chain dated November 12, 2019 with attachments	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 458	Email dated November 20, 2015	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 459	Email chain dated August 8, 2018	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 460	Ripple's Rebate & Incentive Agreements with Digital Currency Exchanges	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 461	Email chain dated June 4, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 462	Email chain dated November 6, 2014	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 463	Email chain dated April 13, 2016 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 466	Email chain dated August 13, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 475	Email chain dated October 10, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 476	Email chain dated October 8, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 479	Email dated June 7, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 481	Email chain dated October 2, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 486	Email dated January 20, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 487	Email dated March 26, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 489	Email dated July 22, 2019 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 490	Email chain dated September 11, 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 491	Email chain dated April 19, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 497	Email chain dated September 21, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 498	Email chain dated June 25, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
PX 499	Email chain dated January 30, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 515	Email chain dated January 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 516	Email dated March 11, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 519	Transcription of Recording of Q4 2017 All Hands meeting, dated December 12, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 520	Email chain dated March 28, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 523	Email chain dated June 24, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 529	Email chain dated August 1, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 532	Email chain dated March 21, 2016 and attachment	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 537	Email chain dated January 5, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 543	Declaration of Third Party, dated September 13, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers
PX 545	Email chain dated November 18, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 548	Email chain dated October 27, 2020	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 552	Email chain dated January 31, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 566	XRP Sales Exchange Geography	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party
PX 571	Deposition transcript of Alan Schwartz, dated February 11, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 574	Email chain dated June 23, 2019	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 589	Email chain dated January 5, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 621	Second Amended Rebuttal Report of SEC Expert No. 1, dated February 24, 2022	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
PX 624	Deposition transcript of Lawrence Angelilli, dated August 3, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 626	ODL Account Review Presentation, dated April 13, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 629	Agreement between Ripple and Third Party, dated December 31, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 630	Email chain dated January 13, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 632	Email chain dated March 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of Ripple employee
PX 639	Memorandum by third party, dated February 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 645	Transcript of Ripple Company Meeting, dated on or around July 20, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 646	Email dated October 29, 2020 with attachment	Redactions	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement
PX 647	Email dated July 29, 2020 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 648	Email dated October 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; Ripple confidential and proprietary information
PX 649	Email chain dated November 18, 2014	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
PX 650	Email chain dated May 5, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 651	Services and Marketing Agreement between Ripple and counterparty., dated November 1, 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 652	Option to Purchase XRP, issued to counterparty, dated September 26, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; PII
PX 653	Amended and Restated Option to Purchase XRP, issued to counterparty, dated September 3, 2018	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 654	Email chain dated May 29, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 655	Email chain dated January 31, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 656	Ripple Presentation, dated April 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party

Document	Document Description	Sealing Request	Sealing Basis
PX 657	Series Seed Preferred Stock Purchase Agreement between Ripple and counterparty, dated November 1, 2018	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 658	Ripple Finance Team Memo	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 659	Ripple Presentation, dated August 20, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 660	Programmatic Market Activity Agreement between Ripple and counterparty, dated August 23, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 661	Market Maker and Programmatic Market Activity Agreement between Ripple and counterparty, dated February 14, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 662	Amendment to Programmatic Market Activity Agreement between Ripple and counterparty, dated March 1, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 663	Programmatic Market Activity Agreement between Ripple and counterparty, dated June 2, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 667	Email chain dated May 6, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee
PX 669	Minutes of a Meeting of the Compensation Committee of the Board of Directors of Ripple Labs, dated April 25, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Employee compensation terms; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 674	Presentation dated April 22, 2015	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
PX 675	Email chain dated January 23, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 677	2014 XRP II Sales: Geographic Concentration	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 686	Third Party Account Information	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Bank account numbers; Digital wallet address
PX 695	Third Party Investment Memo, dated January 2020	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 696	Q3 2019 Board Back Update	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 698	Email dated February 6, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 699	Email chain dated July 3, 2016	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 703	XRP Programmatic Sales Reporting FY14 to Date, as of September 2019	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 704	XRP Distributions Report	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 705	XRP Distributions Report	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Identity or contact information of third party
PX 706	Email chain dated November 28, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 707	Expert Report of Alan Schwartz, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 711	Email dated June 2, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 715	Expert Report of Allen Ferrell, Ph.D., dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
PX 716	XRP EUR Volume Incentive Program Agreement between Ripple and counterparty, dated January 13, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 717	XRP Fee Rebate Program Agreement between Ripple and counterparty, dated October 4, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 718	XRP Volume Incentive Program Agreement between Ripple and counterparty, dated June 1, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 719	XRP Fee Rebate Program Agreement between Ripple and counterparty, dated May 22, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 720	XRP Listing, Volume Incentive and Rebate Agreement between Ripple and counterparty, dated May 17, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 721	XRP Volume Incentive Program Agreement between Ripple and counterparty, dated May 18, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 722	XRP Volume Incentive and Fee Rebate Program Agreement between Ripple and counterparty, dated October 30, 2017	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
PX 735	Memorandum of Understanding between Ripple and counterparty, dated January 28, 2016	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee

## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
PX 736	Joint Venture Agreement between Ripple and counterparty, dated March 30, 2016	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 738	Development and Integration Agreement between Ripple and counterparty, dated November 8, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 739	Ripple Labs Charitable Contributions in XRP, dated January 23, 2020	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 740	Email chain dated March 20, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
PX 746	Consolidated Financial Statement as of December 31, 2014 and 2013	Sealed In Entirety	Confidential information from Ripple financial statements
PX 747	Consolidated Financial Statement as of December 31, 2015 and 2014	Sealed In Entirety	Confidential information from Ripple financial statements
PX 748	Consolidated Financial Statement as of December 31, 2017 and 2016	Sealed In Entirety	Confidential information from Ripple financial statements
PX 749	Consolidated Financial Statement as of December 31, 2018 and 2017	Sealed In Entirety	Confidential information from Ripple financial statements
PX 750	Consolidated Financial Statement as of December 31, 2019 and 2018	Sealed In Entirety	Confidential information from Ripple financial statements
PX 751	Consolidated Financial Statement as of December 31, 2020 and 2019	Sealed In Entirety	Confidential information from Ripple financial statements
PX 752	Ripple spreadsheet re: executive compensation	Sealed In Entirety	Confidential information from Ripple financial statements
PX 753	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 754	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 755	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 756	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 757	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 758	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 759	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 760	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 761	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 762	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 763	Bank Account Transaction Details	Sealed In Entirety	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers
PX 769	Master XRP Market Maker Services Agreement between Ripple and counterparty, dated July 1, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 770	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated September 17, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
PX 771	Master XRP Commitment to Sell Agreement between XRP II, LLC and counterparty, dated September 5, 2018	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
ECF No. 728-4 PX 553	Email chain dated October 3, 2019	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
ECF No. 723	Defendants' Reply in Support of Motion for Summary Judgment	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
ECF No. 663	Defendants' Responses to Plaintiff's Local Rule 56.1 Statement and Statement of Additional Material Facts Pursuant to Local Rule 56.1(b) in Opposition to Plaintiff's Motion for Summary Judgment	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Familial Information
ECF No. 724	Defendants' Responses to Plaintiff's Counter-Statement of Undisputed Facts Pursuant to Local Rule 56.1(b)	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal Familial Information
Exhibit 001	Deposition Transcript of David Schwartz, dated May 26, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of non-parties
Exhibit 004	Deposition Transcript of Dinuka Samarasinghe, dated June 9, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties; Employment history of non-parties
Exhibit 006	Deposition Transcript of Phillip Rapoport, dated July 22, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 008	Deposition Transcript of Christian A. Larsen, dated September 14, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of individual defendants; Personal financial information of non-parties; Personal Familial Information; Personal Financial Holding
Exhibit 009	Deposition Transcript of Asheesh Birla, dated June 23, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal financial information of non-parties
Exhibit 010	Deposition Transcript of Miguel Vias, dated June 28, 2021	Redactions	Confidential information from Ripple financial statements; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 011	Expert Report of Allen Ferrell, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 012	Expert Rebuttal Report of Allen Ferrell, dated November 12, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 021	Deposition Transcript of Ethan Beard, dated August 24, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)



## Appendix A

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 025	Deposition Transcript of Third Party, dated August 11, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Personal Familial Information
Exhibit 026	Plaintiff's Answers & Objections to Defendants' Third Set of Requests for Admission	Redactions	Highly confidential/sensitive/proprietary business information
Exhibit 028	Deposition Transcript of Lawrence Angelilli, dated August 3, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 030	Deposition Transcript of Alan Schwartz, dated February 11, 2022	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 031	XRP/EUR Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 033	XRP Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 034	Fee Rebate Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 035	XRP Listing, Volume Incentive and Rebate Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 036	XRP Volume Incentive Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 037	XRP Volume Incentive and Fee Rebate Program Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 038	Deposition Transcript of Breanne Madigan, dated May 18, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 039	Plaintiff's Supplemental Responses & Objections to Defendant Ripple Labs Inc.'s Interrogatories Nos. 1, 2, 3, 6, 7, 11, 17, 18, 19, 22, 23, and 24	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 040	Expert Report of Alan Schwartz, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Employee compensation terms; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 043	Programmatic Market Activity Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 044	Amendment to Programmatic Market Activity Agreement between Ripple Markets Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 046	XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
Exhibit 047	Master XRP Commitment to Sell Agreement between Ripple Services Inc., XRP II, LLC, and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 049	Ripple Currency Wholesale Sales Invoice between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address; PII
Exhibit 050	Ripple Currency Purchase Letter of Intent between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 051	Ripple Currency Wholesale Sales Order between XRP Fund II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 053	Market Making Agreement between Ripple Markets, Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 054	Master XRP Lease Agreement between Ripple Payments Inc., XRP II, LLC, and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 055	Market Making Agreement between Ripple Markets, Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 056	On Demand Liquidity Incentive #1 between Ripple Services Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 057	Pilot Agreement between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 059	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 060	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 062	Digital Asset Loan Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 063	Custody Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 065	XRP Transfer Request between Ripple Labs Inc. and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Digital wallet address
Exhibit 066	Settlement Agreement and Release between Ripple Labs and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 067	Amended and Restated Option to Purchase XRP between XRP II LLC and counterparty	Sealed in Entirety	Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party
Exhibit 068	Technology Provider Agreement between Ripple Labs, Inc. and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Financial terms of confidential settlement agreement; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)

Document	Document Description	Sealing Request	Sealing Basis
Exhibit 069	Option to Purchase XRP between XRP II LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 070	Summary of XRP Purchase Agreement between XRP II, LLC and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 073	Development and Integration Agreement between Ripple Labs Inc. and counterparty	Redactions	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 076	Deposition Transcript of Bradley Garlinghouse, dated September 20, 2021	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third-party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
Exhibit 077	Investigative Testimony Transcript of Bradley Garlinghouse, dated September 10, 2020	Redactions	Financial and pricing terms of contracts with third parties; Employee compensation terms; Identity or contact information of third party; Identity or contact information of Ripple employee; Personal financial information of Individual Defendants
Exhibit 091	Digital asset exchange account access reset request	Sealed In Entirety	Highly confidential/sensitive/proprietary business information; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Bank account numbers; Personal financial information of individual defendants
Exhibit 101	Email chain dated August 11 and December 2, 2020	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 105	Expert Rebuttal Report of SEC Expert No. 1, dated November 12, 2021	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
Exhibit 106	Second Amended Expert Rebuttal Report of SEC Expert No. 1, dated February 24, 2022	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Bank account numbers; Digital wallet address
Exhibit 115	Email dated June 26, 2017 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of Ripple employee
Exhibit 133	Market Maker and Programmatic Market Making Activity Agreement between Ripple Markets and counterparty	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)
Exhibit 134	Plaintiff's First Set of Requests for Admission to Defendant Ripple Labs, Inc.	Redactions	Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 137	Email chain dated July 2014	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 158	Plaintiff's Answers and Objections to Defendants' Fourth Set of Requests for Admission	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 171	Expert Report of Peter Easton, dated October 4, 2021	Redactions	Highly confidential/sensitive/proprietary business information; Confidential information from Ripple financial statements; Financial and pricing terms of contracts with third parties; Identity or contact information of third party
Exhibit 228	Presentation by third party to SEC, dated December 15, 2017	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 229	Email dated February 14, 2019 with attachment	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party
Exhibit 232	Summary of XRP Purchase by counterparty from XRP II, LLC	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth); Digital wallet address
Exhibit 258	Email chain dated November 11, 2018	Redactions	Highly confidential/sensitive/proprietary business information; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 259	Email dated January 12, 2019	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 270	Transcript of Recording of Internal Ripple Company Meeting	Redactions	Confidential information from Ripple financial statements; Identity or contact information of third party; Identity or contact information of Ripple employee
Exhibit 284	Agreement between Ripple and third party	Redactions	Financial and pricing terms of contracts with third parties; Identity or contact information of third party; FRCP 5.2(a) PII (e.g., Social Security number, dates of birth)