

1 JOHN W. BERRY (Cal. Bar No. 295760) (admitted *pro hac vice*)
 Email: berryj@sec.gov
 2 AMY JANE LONGO (Cal. Bar No. 198304) (admitted *pro hac vice*)
 Email: longoa@sec.gov
 3 LESLIE A. HAKALA (Cal. Bar. No. 199414) (admitted *pro hac vice*)
 4 Email: hakalal@sec.gov

5 Attorneys for Plaintiff
 Securities and Exchange Commission
 6 Michele Wein Layne, Regional Director
 7 Lorraine Echavarria, Associate Regional Director
 John W. Berry, Regional Trial Counsel
 8 444 S. Flower Street, Suite 900
 Los Angeles, California 90071
 9 Telephone: (323) 965-3998
 10 Facsimile: (213) 443-1904

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

15 SECURITIES AND EXCHANGE
 16 COMMISSION,
 17 Plaintiff,
 18 vs.
 19 BANC DE BINARY LTD, OREN
 20 SHABAT LAURENT (f/k/a OREN
 21 SHABAT), ET BINARY OPTIONS LTD.,
 22 BO SYSTEMS LTD. SEYCHELLES and
 BDB SERVICES LTD. SEYCHELLES,
 23 Defendants.

Case No.: 2:13-cv-00993-RCJ-VCF
**STIPULATION AND PROPOSED ORDER
 STAYING ACTION PENDING
 POTENTIAL SETTLEMENT**

25 WHEREAS, Plaintiff Securities and Exchange Commission (the “SEC”) and Defendants
 26 Banc de Binary Ltd, Oren Shabat Laurent, ET Binary Options Ltd., BO Systems Ltd. Seychelles,
 27 and BDB Services Ltd. Seychelles, have reached a potential settlement in principle that would
 28 resolve this action and the action *CFTC v. Banc de Binary Ltd et al.*, Case No. 2:13-cv-00992-

1 MMD-VCF (the “CFTC Action”);

2 WHEREAS, the defendants in this action and the CFTC Action, counsel for the CFTC
3 and counsel for the SEC have executed a Term Sheet re: Proposed Global Settlement, dated
4 August 27, 2015, reflecting the terms of their proposed agreement in principle (the “Proposed
5 Global Settlement”);

6 WHEREAS, the Proposed Global Settlement is subject to approval by both the
7 Commissioners of the SEC and the Commissioners of the CFTC;

8 WHEREAS, in the interests of efficiency for the Court and the parties, the parties agree
9 to stay this action, subject to the Court’s approval, so that the parties can attempt to finalize the
10 governing documents for the Proposed Global Settlement, so that counsel for the SEC can
11 recommend the settlement to the SEC Commissioners, and so that the parties can file, if
12 approved by the SEC Commissioners, any resulting final settlement papers; and

13 WHEREAS, the parties to the CFTC Action are simultaneously filing a similar proposed
14 stipulation and order to stay the CFTC Action, for the same duration;

15 FOR THE REASONS SET FORTH ABOVE, IT IS HEREBY STIPULATED, by and
16 among counsel for the parties as follows:

17 1. This action is stayed until October 23, 2015.

18 2. Before October 23, 2015, this stay shall be lifted without further action by the
19 Court upon the filing of a notice by any party to lift the stay, at which point the litigation shall
20 immediately resume on the filing date of that notice, with the parties restored to their respective
21 positions as of the date of this stipulation. No party can challenge or dispute the filing of a notice
22 to lift the stay by another party. To the extent the stay is lifted by such notice by a party, the
23 defendants’ response to the SEC’s pending summary judgment motion (Dkt. Nos. 126, 128) shall
24 be due four days after the notice is filed. Moreover, within five business days of the filing of
25 party’s notice to lift the stay, the parties agree to jointly request a status conference with the
26 Court to address the remaining pretrial and trial schedule.

27 3. If the SEC Commissioners do not approve a settlement or a final settlement is not
28 otherwise reached, with all definitive final documents filed with the Court, by October 23, 2015,

1 then the litigation shall resume on that day, without further action of the Court and with the
2 parties restored to their respective positions as of the date of this stipulations. The defendants'
3 response to the SEC's pending summary judgment motion (Dkt. Nos. 126, 128) shall be due
4 October 28, 2015. Moreover, on or before October 30, 2015, the parties agree to jointly request
5 a status conference with the Court to address the remaining pretrial and trial schedule.
6

7 Dated: August 27, 2015

Dated: August 27, 2015

8 /s/ John W. Berry

/s/ Jeff Ifrah

9 John W. Berry
10 Amy J. Longo
11 Leslie A. Hakala
12 444 S. Flower Street, 9th Floor
13 Los Angeles, CA 90071
14 Telephone: (323) 965-3998
15 Facsimile: (213) 443-1904

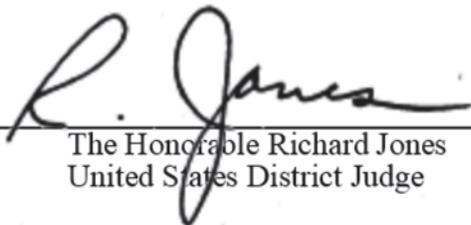
A. Jeff Ifrah
Rachel Hirsch
Ifrah Law
1717 Pennsylvania Avenue, NW, Suite 650
Washington, DC 20006-2004
Telephone: (202) 524-4140
Facsimile: (202) 524-4141

Attorneys for Defendants

*Attorneys for Plaintiff
Securities and Exchange Commission*

16 IT IS SO ORDERED.

17 Dated: -September 3, 2015—
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20 The Honorable Richard Jones
21 United States District Judge
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SEC v. Banc de Binary Ltd, et al.
United States District Court – District of Nevada
Case No. 2:13-cv-00993-RCJ-VCF

SERVICE LIST

A. Jeff Ifrah, Esq.
Rachel Hirsch, Esq.
Ifrah PLLC
1717 Pennsylvania Avenue, NW, Suite 650
Washington, DC 20006-2004
jeff@ifrahlaw.com
rhirsch@ifrahlaw.com
Tel: (202) 524-4147

Craig S. Denney, Esq.
Greg Brower, Esq.
Carrie L. Parker, Esq.
SNELL & WILMER L.L.P
50 West Liberty Street, Suite 510
Reno, NV 89501
cdenny@swlaw.com
gbrower@swlaw.com
cparker@swlaw.com
Tel: (775) 785-5440

Attorneys for Defendants