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2	THE HONORABLE JAMES L. ROBART	
3	INTER STATES DISTRICT COURT	
4	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
5	SEATTLE DIVISION	
6	SECURITIES AND EXCHANGE COMMISSION,	Case No. 2:17-cv-00405-JLR
7	Plaintiff,	
8	v.	STIPULATION AND PROPOSED ORDER
9	ANDY CHIN FONG CHEN AND AERO SPACE PORT INTERNATIONAL GROUP,	
10	INC.	
11	Defendants, and	
12	NORTH AMERICAN FOREIGN TRADE	
13	ZONE INDUSTRIES, LLC; WASHINGTON ECONOMIC DEVELOPMENT CAPITAL,	
14	LLC; WASHINGTON ECONOMIC DEVELOPMENT CAPITAL II, LLC; EVF,	an a
15	INC.; MOSES LAKE 96000 BUILDING LLC; SUN BASIN ORCHARDS, LLC; JOHN	
16	CHEN; TOM CHEN; BOBBY CHEN; and HEIDI CHEN,	
17	Relief Defendants.	
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19	The parties, the Securities and Exchange Commission ("SEC") and Andy Chin	
20	Fong Chen and Aero Space Port International Group, Inc. (the "Defendants"), submit this	
21	STIPULATION AND PROPOSED ORDER. The parties have conferred about the best	
22	way to proceed in this matter.	
23	1. The parties request that the Court's Order setting an evidentiary hearing	
24	in this matter for March 23, 2020 be continued pending further developments with	
25	respect to the matters set forth in the parties' joint letter to the Court of March 13, 2020.	
26	2. The parties request that they be allowed to update the Court on these	
27	developments with a Joint Status Report on April 17, 2020.	
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	STIPULATION AND PROPOSED ORDER 1	SEC v. Chen et al., 17-cv-0405 (WDNY)(JLR)

Dated: March 13, 2020 Respectfully submitted, 1 2 3 By: /s John D. Worland, Jr. /s/ Frank R. Siderius JOHN D. WORLAND, JR.\* FRANK R. SIDERIUS, 4 DAVID MENDEL\* WSBA #7759 **GREGORY N. MILLER\*** 5 (\*Conditionally Admitted SIDERIUS, LONERGAN & Pursuant to Local Rule 83.1)) MARTIN, LLP 6 worlandj@sec.gov 7 Attorneys for Defendants and Relief Defendants 8 Attorneys for Plaintiff 500 Union Street, Suite 847 9 SECURITIES AND Seattle, WA 98101 EXCHANGE COMMISSION 206.624.2800 work 10100 F Street NE franks@sidlon.com WASHINGTON, DC 20549 11 www.sidlon.com Telephone: (202) 551-4418 12 13 14 ORDER 23 A. A 15 IT IS SO ORDERED this 16 day of \_\_\_\_\_, 2020. 16 17 18 19 THE HONORABLE JAMES L. ROBART 20 21 22 23 24 25 26 2728 STIPULATION AND PROPOSED ORDER SEC v. Chen et al., 17-cv-0405 (WDNY)(JLR) 2