

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

BITTREX, INC., BITTREX GLOBAL
GMBH, and WILLIAM HIROAKI SHIHARA,

Defendants.

No. 2:23-cv-00580-RSM

**STIPULATED MOTION AND ORDER TO
EXPAND THE BRIEFING WORD LIMITS**

**NOTE ON MOTION CALENDAR: JUNE
26, 2023**

1 Defendants Bittrex, Inc. (“Bittrex”), Bittrex Global GmbH (“Bittrex Global”), and William
2 Hiroaki Shihara (“Shihara”) (collectively, “Defendants”) respectfully request an expansion of the
3 briefing word limits pursuant to LCR (7)(f). Defendants make this request because Plaintiff the
4 Securities and Exchange Commission’s 247-paragraph Complaint raises complex issues of fact and
5 law. The legal complexities of the claims merit additional words to fully brief the questions
6 presented for the Court’s consideration. Plaintiff consents to this request.

7 The Parties therefore respectfully stipulate as follows:

- 8 1. Defendants Bittrex and Shihara shall file a Joint Response to the Complaint;
- 9 2. Defendant Bittrex Global shall file a separate Response to the Complaint;
- 10 3. Plaintiff may elect to file a single Omnibus Brief in Opposition, in lieu of separate Briefs
11 in Opposition;
- 12 4. Given the complexities of the claims presented and pursuant to LCR 7(f), the Parties
13 agree to expand the word limits as follows:
 - 14 a. Defendants Bittrex and Shihara’s Joint Response to the Complaint is
15 expanded to 10,400 words;
 - 16 b. Defendant Bittrex Global’s Response to the Complaint is expanded to 10,400
17 words;
 - 18 c. Plaintiff’s Briefs in Opposition are expanded to 10,400 words each, or in the
19 alternative, Plaintiff’s Omnibus Brief in Opposition is expanded to 15,600
20 words; and
 - 21 d. Defendants’ respective Reply Briefs are expanded to 5,200 words.

22
23 **SO STIPULATED.**

24
25 Dated: June 26, 2023

26 */s/ Alicia Cobb*

27 Alicia Cobb, WSBA #48685
28 QUINN EMANUEL URQUHART &
SULLIVAN, LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1109 First Avenue, Suite 210
Seattle, Washington 98101
Phone (206) 905-7000
Fax (206) 905-7100
aliciacobb@quinnemanuel.com

Michael Liftik (admitted *pro hac vice*)
Christopher Michel (admitted *pro hac vice*)
Robert Zink (admitted *pro hac vice*)
Kurt Wolfe (admitted *pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1300 I Street NW, Suite 900
Washington, D.C. 20005
Phone (202) 538-8000
Fax (202) 538-8001
michaelliftik@quinnemanuel.com
robertzink@quinnemanuel.com
christophermichel@quinnemanuel.com
kurtwolfe@quinnemanuel.com

Stacylyn Doore (admitted *pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
111 Huntington Avenue, Suite 520
Boston, Massachusetts 02199
Phone (617) 712-7100
Fax (617) 712-7200
stacylyndoore@quinnemanuel.com

Counsel for Defendant Bittrex, Inc.

/s/ Andrew Michaelson
KING & SPALDING LLP
Andrew Michaelson (admitted *pro hac vice*)
Eric Hirsch (admitted *pro hac vice*)
Leigh Nathanson (admitted *pro hac vice*)
Lauren Myers (admitted *pro hac vice*)
1185 Avenue of Americas, 35th Floor
New York, NY 10036
Telephone: 212-790-5358
amichaelson@kslaw.com
ehirsch@kslaw.com
lnathanson@kslaw.com
lmyers@kslaw.com

Lead Counsel for Defendant Bittrex Global GmbH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ David Smith
SUMMIT LAW GROUP
David Smith
315 5th Ave. South, Suite 1000
Seattle, Washington 98104
Telephone: 206-676-7000
davids@summitlaw.com

Local Counsel for Defendant Bittrex Global GmbH

/s/ William McGovern
KOBRE & KIM
William F. McGovern (admitted *pro hac vice*)
Jeremy O. Bressman (admitted *pro hac vice*)
Jonathan D. Cogan (admitted *pro hac vice*)
800 3rd Ave, New York
New York, NY 10022
Telephone: 212-488-1210
william.mcgovern@kobrekim.com
jeremy.bressman@kobrekim.com
jonathan.cogan@kobrekim.com

Lead Counsel for Defendant William Hiroaki Shihara

/s/ Gregory Hollon
McNAUL EBEL NAWROT & HELGREN
PLLC
Gregory J. Hollon
Timothy B. Fitzgerald
600 University Street, Suite 2700
Seattle, Washington, 98101
Telephone: 206-467-1816
ghollon@mcnaul.com
tfitzgerald@mcnaul.com

Local Counsel for Defendant William Hiroaki Shihara

/s/ Ben Kuruvilla
Ben Kuruvilla
Christopher Carney
Ladan Fazlollahi Stewart
Jorge Tenreiro
U.S. SECURITIES AND EXCHANGE
COMMISSION
100 Pearl Street, Ste. 20-100
New York, NY 10004
Telephone: 212-336-5599
kuruvillabe@sec.gov
carnevc@sec.gov

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

stewartla@sec.gov
tenreiroj@sec.gov

Counsel for Plaintiff

IT IS SO ORDERED.

DATED this 28th day of June, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Alicia Cobb, hereby certify I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED: June 26, 2023

/s/ Alicia Cobb

Alicia Cobb, WSBA #48685

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

1109 First Avenue, Suite 210

Seattle, Washington 98101

Phone (206) 905-7000

Fax (206) 905-7100

aliciacobb@quinnemanuel.com