

1 Laurence M. Rosen, Esq. (SBN 219683)  
2 **THE ROSEN LAW FIRM, P.A.**  
3 355 South Grand Avenue, Suite 2450  
4 Los Angeles, CA 90071  
5 Telephone: (213) 785-2610  
6 Facsimile: (213) 226-4684  
7 Email: lrosen@rosenlegal.com

8 *Lead Counsel for Lead Plaintiff*  
9 *and Proposed Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

NICK PATTERSON, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TERRAFORM LABS, PTE. LTD., JUMP  
CRYPTO, JUMP TRADING LLC,  
TRIBE CAPITAL, DEFINANCE  
CAPITAL/DEFINANCE  
TECHNOLOGIES OY, THREE  
ARROWS CAPITAL PTE. LTD.,  
NICHOLAS PLATIAS and DO KWON,

Defendants.

Case No. 22-CV-03600-PCP

**CLASS ACTION**

**PLAINTIFFS' NOTICE OF VOLUNTARY  
DISMISSAL WITHOUT PREJUDICE**

Judge: Hon. P. Casey Pitts

1           **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**  
2 **RESPECTIVE COUNSEL OF RECORD:**

3           **PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Lead Plaintiff  
4 Michael Tobias and named plaintiff Nick Patterson (together, “Plaintiffs”), hereby voluntarily  
5 dismiss this case, in its entirety, without prejudice, *only* against defendants Terraform Labs, Pte.  
6 Ltd., and Do Kwon (collectively, “TFL Defendants”).

7           The TFL Defendants have neither answered the complaint (Dkt. No. 102) nor filed motions  
8 for summary judgment. Because the Court has not certified the proposed class for any purpose in  
9 this case and this dismissal is without prejudice, it will not bind members of the proposed class.  
10 No notice to the proposed class is necessary. Neither Plaintiffs nor their attorneys have received  
11 or will receive any consideration for this dismissal.

12 Dated: September 28, 2023

Respectfully submitted,

14 **THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen

Laurence M. Rosen, Esq. (SBN 219683)

Pronouns: he/him/his

355 South Grand Avenue, Suite 2450

Los Angeles, CA 90071

Telephone: (213) 785-2610

Facsimile: (213) 226-4684

Email: lrosen@rosenlegal.com

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and

**THE ROSEN LAW FIRM, P.A.**

Jacob A. Goldberg (*pro hac vice*)  
Pronouns: he/him/his  
Michael Cohen (*pro hac vice*)  
Pronouns: he/him/his  
275 Madison Avenue, 40<sup>th</sup> Floor  
New York, NY 10016  
Telephone: (212) 686-1060  
Facsimile: (212) 202-3827  
Email: jgoldberg@rosenlegal.com  
mcohen@rosenlegal.com

*Lead Counsel for Plaintiffs and the Putative Class*

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

John T. Jasnoch (CA 281605)  
jjasnoch@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Telephone: 619-233-4565  
Facsimile: 619-236-0508

and

Sean T. Masson (*pro hac vice*)  
The Helmsley Building  
230 Park Avenue, 17<sup>th</sup> Floor  
New York, NY 10169  
Telephone: 212-223-6444  
smasson@scott-scott.com

*Additional Counsel*

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**PROOF OF SERVICE**

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On September 28, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

I certify under penalty that the foregoing is true and correct.

Executed on September 28, 2023

/s/ Laurence M. Rosen  
Laurence M. Rosen