

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	No. 1:23-cv-01599-ABJ-ZMF
)	
BINANCE HOLDINGS LIMITED,)	
BAM TRADING SERVICES INC.,)	
BAM MANAGEMENT US HOLDINGS)	
INC., AND CHANGPENG ZHAO,)	
)	
Defendants.)	

**JOINT MOTION FOR A PROTECTIVE ORDER
CONCERNING CONFIDENTIAL INFORMATION**

Plaintiff Securities and Exchange Commission (“SEC”), Defendant Binance Holdings Limited, Defendant BAM Trading Services Inc., Defendant BAM Management US Holdings Inc., and Defendant Changpeng Zhao (collectively, the “Parties”), through undersigned counsel jointly move for the entry a protective order to govern the treatment and disclosure of certain confidential information during the course of this litigation. The proposed protective order accompanies this motion.

Documents and other information to be produced in connection with this litigation may contain confidential or other nonpublic information as specified in the proposed protective order. The Parties have agreed to a proposed protective order that limits how such information, as well as how other similarly sensitive information will be protected and disclosed during the course of this litigation.

Dated: September 11, 2023

Respectfully submitted,

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