

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.)	

**PLAINTIFF SECURITIES AND EXCHANGE
COMMISSION’S MOTION TO COMPEL AND FOR OTHER RELIEF**

Pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission (“SEC”) respectfully moves this Court to compel Defendants BAM Trading Services Inc. and BAM Management US Holdings Inc. (collectively, “BAM”) to produce discovery and related relief in accordance with the proposed order attached hereto. The grounds for the SEC’s Motion are set forth in the SEC’s supporting memorandum and accompanying exhibits that are attached hereto. The SEC’s memorandum also contains the SEC’s opposition to BAM’s related motion for a protective order, Dkt. No. 95.

Pursuant to Local Civil Rule 7(m), the SEC states that counsel for BAM has informed the SEC that it opposes this Motion.

Dated: August 28, 2023

Respectfully submitted,

/s/Jennifer L. Farer

Matthew Scarlato (D.C. Bar No. 484124)

Jennifer L. Farer (D.C. Bar No. 1013915)

J. Emmett Murphy

David A. Nasse (D.C. Bar No. 1002567)

Jorge G. Tenreiro

SECURITIES AND EXCHANGE COMMISSION

(202) 551-5072 (Farer)

farerj@sec.gov

Attorneys for Plaintiff