UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

BINANCE HOLDINGS LIMITED, BAM TRADING SERVICES INC., BAM MANAGEMENT US HOLDINGS INC., AND CHANGPENG ZHAO,

Defendants.

No. 1:23-cv-01599-ABJ-ZMF

NOTICE OF BAM TRADING INC. AND BAM MANAGEMENT US HOLDINGS INC.'S MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of Their Motion to Dismiss, Defendants BAM Trading Services Inc. and BAM Management US Holdings Inc. (together, "BAM") will move before the Honorable Amy Berman Jackson, United States Judge of the United States District Court for the District of Columbia, 333 Constitution Avenue, N.W., Washington, DC 20001, for an Order dismissing the claims in the Complaint asserted against BAM in the above-captioned matter.

This motion is supported by the accompanying Memorandum of Law in Support of the Motion to Dismiss, the Declaration of Matthew Beville, and the accompanying exhibits numbered 1 through 5.

Dated: September 21, 2023 Respectfully submitted,

/s/ William R. McLucas

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