

**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**

**UNOPOSED MOTION FOR CONTINUANCE**

Pursuant to Federal Rule of Civil Procedure 6(b) and LCvR 16.1(b), BAM Trading Services, Inc. (“BAM Trading”) and BAM Management US Holdings Inc. (“BAM Management,” together with BAM Trading, “BAM”), by and through BAM’s undersigned counsel, hereby respectfully moves for a continuance until January 19, 2024 for the Court to hold a hearing on the motions to dismiss the above captioned matter, which is currently set for January 18, 2023. In support of this Motion, BAM states as follows:

1. On October 24, 2023, the Court ordered the parties to appear for a hearing on the motions to dismiss the above captioned matter on January 18, 2024, at 10:00 AM.
2. Unfortunately, lead counsel for BAM is unavailable on the date selected by the Court.
3. In accordance with LCvR 16.1(b), counsel for BAM promptly notified counsel for the Securities and Exchange Commission (“SEC”) as soon as it became aware of the scheduling conflict. Counsel for BAM has conferred with counsel for Plaintiff and the other Defendants, and

all parties would be available to attend the conference on January 19, 2024. The SEC and the other Defendants do not object to the requested continuance of the conference to January 19, 2024.

4. The requested continuance is made in good faith, and will not cause any delay or prejudice. Furthermore, good cause exists for the requested continuance until January 19, 2024, because the continuance would resolve the scheduling conflicts described above.

Accordingly, for good cause shown, BAM respectfully requests that this Honorable Court grant this unopposed Motion, and continue the hearing currently scheduled for January 18, 2024, to January 19, 2024.

Dated: November 9, 2023

Respectfully submitted,

/s/ William R. McLucas

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