

**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

JOINT STATUS REPORT

Plaintiff Securities and Exchange Commission (“SEC”), Defendants BAM Management US Holdings Inc., BAM Trading Services Inc. (collectively, “BAM”), Binance Holdings Limited (“BHL” or “Binance”), and Changpeng Zhao (“Zhao”), respectfully submit this Joint Status Report. As described below, since the last joint status report, the parties have continued to make progress on outstanding discovery issues and do not presently have any issues ripe for adjudication.

BAM has produced additional discovery and has represented that it has made its final production of documents in response to the SEC’s requests. The SEC is in the process of reviewing these productions and presently anticipates identifying a few discrete issues to BAM. The SEC will continue to meet and confer with BAM to resolve these issues.

Binance has also produced discovery in response to some of the SEC’s requests and has agreed to produce discovery as to other requests. In addition, the SEC and Binance are negotiating the topics for a Rule 30(b)(6) deposition. The parties anticipate holding the Rule

30(b)(6) deposition of Binance in the next four to six weeks, given the logistics involved. Zhao recently served responses to the SEC's interrogatories. The SEC and Zhao are continuing to meet and confer regarding Zhao's response to the SEC's document requests.

The parties continue to meet and confer on outstanding issues and hope to resolve them without requiring Court intervention. As for further proceedings, the parties propose that they will notify the Court if any issues arise that require the Court's intervention. The SEC continues to reserve all rights concerning any outstanding discovery or additional depositions from any of the Defendants. Defendants continue to reserve all objections.

Dated: April 5, 2024

Respectfully submitted,

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