

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)

**BAM TRADING SERVICES INC. AND BAM MANAGEMENT US HOLDINGS, INC.’S  
MOTION TO EXTEND DEADLINE FOR VERIFIED WRITTEN ACCOUNTING**

BAM Trading Services Inc. (“BAM Trading”) and BAM Management US Holdings Inc. (“BAM Management,” and collectively “BAM”) respectfully move the Court to extend the deadline for BAM to serve upon the Securities and Exchange Commission (the “Commission”) a verified written accounting pursuant to Section IV of the Consent Order dated June 17, 2023 (the “Consent Order”) [Dkt. No. 71] to Monday, August 7, 2023.

The Consent Order required BAM to “serve upon the Commission a verified written accounting” “on or before 45 days from the date the Court issues [the] Consent Order.” As a result, BAM was required to serve upon the Commission a verified written accounting on or before Tuesday, August 1, 2023. BAM has made every effort to comply with this provision of the Consent Order. However, given the volume of information that BAM is required to verify as part of the written accounting, BAM was unable to complete the quality control work necessary to verify the contents of the written accounting by the deadline contained in the Consent Order. BAM is working diligently to complete this quality control work promptly. In order to allow BAM to

complete this work and ensure the accuracy of the information contained in the verified written accounting, BAM respectfully requests that the Court extend the deadline for BAM to serve the verified written accounting until Monday, August 7, 2023. This is BAM's first request to extend the deadline to serve a verified written accounting pursuant to Section IV of the Consent Order.

BAM has conferred with the Commission, and the Commission does not oppose this motion.

Dated: August 3, 2023

Respectfully submitted,

/s/ William R. McLucas

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