



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

VIA ECF

April 1, 2025

The Honorable Edgardo Ramos  
United States District Court for the Southern District of New York  
40 Foley Square, Courtroom 619  
New York, New York 10007

Re: SEC v. Genesis Global Capital, LLC et al., No. 1:23-cv-287

Dear Judge Ramos:

Pursuant to Section 1.E of Your Honor's Individual Practices and Rule 1 of the Federal Rules of Civil Procedure, the parties in the above referenced matter write jointly to respectfully request a 60-day stay of all deadlines in this case to allow the parties to explore a potential resolution.

A district court has "broad discretion to stay proceedings as an incident to its power to control its docket." *Clinton v. Jones*, 520 U.S. 681, 706 (1997). A district court deciding a motion to stay should consider the interests of each party, the interests of the courts, the interests of non-parties, and the public interest. *Kappel v. Comfort*, 914 F. Supp. 1056, 1058 (S.D.N.Y. 1996) (citation omitted).

In this case, the parties submit that it is in each of their interests to stay this matter while they consider a potential resolution and agree that no party or non-party would be prejudiced by a stay. Further, a stay is in the Court's and the public's interest because a resolution would conserve judicial resources.

Accordingly, the parties respectfully request that the Court grant this joint request for a 60-day stay. The parties propose that they will submit a joint status report within 60 days after entry of the stay.

Respectfully submitted,

/s/ Edward J. Reilly  
Edward J. Reilly  
Counsel for Plaintiff Securities  
and Exchange Commission

/s/ Andrew Bosse  
Andrew Bosse  
Counsel for Defendant Gemini  
Trust Company, LLC

cc: All Counsel of Record (via ECF)