

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

TERRAFORM LABS, PTE. LTD. and DO
HYEONG KWON,

Defendants.

Civil Action No. 1:23-cv-01346-JSR

Hon. Jed S. Rakoff

NOTICE OF MOTION

PLEASE TAKE NOTICE that, Defendants Terraform Labs Pte. Ltd. and Do Kwon, by their undersigned counsel, respectfully move, pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), for an Order dismissing the Securities and Exchange Commission's Amended Complaint (ECF No. 25) with prejudice and granting such other and further relief as this Court may deem just and proper.

This Motion is based on this Notice of Motion, the concurrently filed Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint, and the declaration of Douglas W. Henkin, including the accompanying exhibits, and the pleadings and papers filed herein, and upon such other and further matters as may be presented to the Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's March 7, 2023 Civil Case Management Order, Plaintiff's opposition shall be served by May 12, 2023, and Defendants' reply shall be served by May 19, 2023.

Dated: April 21, 2023

Respectfully submitted,

/s/ Douglas W. Henkin

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