

August 25, 2025

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *SEC v. Sun, et al.*, Case No. 1:23-cv-02433-ER (S.D.N.Y.)

Dear Judge Ramos:

Plaintiff Securities and Exchange Commission and Defendants Justin Sun, Tron Foundation Limited, BitTorrent Foundation Ltd., and Rainberry, Inc. (collectively, the “Parties”) jointly submit this status report and update pursuant to the Court’s entry of a stay in this matter.

Discussions about a final resolution of this matter remain ongoing. Accordingly, the Parties believe that a stay continues to be warranted.

The Parties will submit another joint status report within 60 days of this filing.

Respectfully submitted,

/s/ Adam B. Gottlieb
Adam B. Gottlieb

Counsel for Plaintiff
Securities and Exchange Commission

/s/ Jennifer Bretan
Jennifer Bretan

Fenwick & West LLP
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Tron Foundation Limited,
BitTorrent Foundation Ltd., and
Rainberry, Inc.