October 24, 2025

MEMO ENDORSED

BY ECF

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

The application is x granted
____ denied

Edgardo Ramos, U.S.D.J
Dated: October 24, 2025
New York, New York

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 remained ongoing through September 2025. Due to a lapse in appropriations, the SEC shut down as of October 1, 2025. Since that date, the SEC attorneys assigned to this matter have been furloughed and prohibited from working. The Parties expect to resume discussions regarding a final resolution of this matter after the shutdown ends. Accordingly, the Parties believe that a stay continues to be warranted.

The Parties will submit another joint status report within 60 days after the shutdown ends.

Respectfully submitted,

/s/ Adam B. Gottlieb
Adam B. Gottlieb

Counsel for Plaintiff
Securities and Exchange Commission

/s/ Jennifer Bretan
Jennifer Bretan

Fenwick & West LLP
Counsel for Defendants Justin Sun,
Tron Foundation Limited,
BitTorrent Foundation Ltd., and
Rainberry, Inc.