May 24, 2024

Via ECF

The Honorable Katherine Polk Failla, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: Securities and Exchange Commission v. Coinbase, Inc. et al.,

23 Civ. 4738 (KPF)

Dear Judge Failla:

Plaintiff Securities and Exchange Commission and defendants Coinbase, Inc. and Coinbase Global, Inc., respectfully submit the enclosed Stipulation and Proposed Protective Order and Stipulation and Proposed Fed. R. Evid. 502(d) Order, each of which conforms with the Court's May 22, 2024 Order (D.E. 127).

Respectfully submitted,

Patrick R. Costello Counsel for Plaintiff

Kevin S. Schwartz

Counsel for Defendants

Cc: All counsel of record (via ECF)