

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FEDERAL TRADE COMMISSION,

Plaintiff,

- against -

ALEXANDER MASHINSKY,  
SHLOMI DANIEL LEON, and  
HANOCH “NUKE” GOLDSTEIN,

Defendants.

ECF Case

No. 23 Civ. 6009 (DLC)

**NOTICE OF MOTION**

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PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in the criminal case *United States v. Mashinsky, et al.*, 23 Cr. 347 (JGK); the accompanying memorandum of law; and the accompanying sealed *ex parte* letter, the United States of America, by its attorney, Damian Williams, United States Attorney for the Southern District of New York, and Allison Nichols, Adam Hobson, and Noah Solowiejczyk, Assistant United States Attorneys, will move this Court for an order (i) to intervene in the above-captioned case, pursuant to Rule 24 of the Federal Rules of Civil Procedure, and (ii) to stay discovery in this matter in its entirety until the Court’s resolution of the defendants’ motions to dismiss this action, as well as for such other relief as the Court deems just and proper.

Dated: New York, New York  
September 11, 2023

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

/s/ \_\_\_\_\_  
Allison Nichols  
Adam Hobson  
Noah Solowiejczyk  
Assistant United States Attorneys  
Telephone: (212) 637-2366