

THE HONORABLE TANA LIN

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ISHAN WAHI, NIKHIL WAHI, and
SAMEER RAMANI,

Defendants.

No. 2:22-cv-01009

**JOINT STIPULATED NOTICE TO
EXTEND THE TIME TO RESPOND**

**NOTE ON MOTION CALENDAR:
APRIL 3, 2023**

1 Pursuant to Judge Lin’s Standing Order for All Civil Cases, Plaintiff Securities and
 2 Exchange Commission (“SEC”) and Defendants Ishan Wahi and Nikhil Wahi, by and through
 3 their undersigned counsel, stipulate to a revised schedule for the SEC to file an Opposition to the
 4 Wahis’ Motion to Dismiss (Dkt. #33).¹ The current deadline for the SEC’s Opposition is April
 5 6, 2023. (*See* Nov. 28, 2022 Notice to Filer). For the reasons set forth below, the SEC and the
 6 Wahis request the Clerk to reset the deadline for the SEC’s Opposition to June 15, 2023 and the
 7 Wahis Reply to July 15, 2023.

8 At this time, the SEC has an agreement in principle with Ishan Wahi to resolve all of the
 9 SEC’s claims in this matter. The SEC and Nikhil Wahi are also in good faith discussions that
 10 may resolve the SEC’s claims. Any settlement recommended by SEC staff must be reviewed
 11 within the SEC and approved by the SEC’s Commissioners before it may be submitted to the
 12 Court for approval, a process that can take a number of weeks. To allow time for: 1) the SEC
 13 and Ishan Wahi to finalize the terms of a settlement; 2) the SEC and Nikhil Wahi to move forward
 14 on settlement discussions; and 3) for the SEC’s Commissioners to review proposed settlements,
 15 the parties jointly request that the deadline for the SEC’s Opposition be moved to June 15, 2023.
 16 The Wahis’ Reply would be due July 15, 2023. The Parties further agree that discovery shall be
 17 stayed in this case until the resolution of the Wahis’ Motion to Dismiss.

18
 19 DATED this 3rd Day of April, 2023

20
 21 **SO STIPULATED.**

22 Respectfully submitted,

23
 24 /s/ James M. Burnham
 25 James M. Burnham, Admitted *Pro Hac Vice*
 JONES DAY

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 27 ¹ The SEC has filed a Motion for Alternative Service on Defendant Sameer Ramani (Dkt. #28) but has not
 otherwise been contacted by Ramani or by an attorney representing him in this matter.

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