DAVID J. VAN HAVERMAAT (Cal. Bar No. 175761) 1 Email: vanhavermaatd@sec.gov DAVID S. BROWN (Cal. Bar No. 134569) 2 Email: brownday@sec.gov 3 Attorneys for Plaintiff Securities and Exchange Commission 4 5 Joseph G. Sansone, Unit Chief (Market Abuse Unit) New York Regional Office 200 Vesey Street, Suite 400 New York, New York 10281 6 7 Robert A. Cohen, Unit Chief (Cyber Unit) 8 Headquarters 100 F'Street, N.E. Washington, District of Columbia 20549 9 Michele Wein Layne, Regional Director Amy Jane Longo, Regional Trial Counsel 10 444 S. Flower Street, Suite 900 11 Los Angeles, California 90071 Telephone: (323) 965-3998 Facsimile: (213) 443-1904 12 13 UNITED STATES DISTRICT COURT 14 CENTRAL DISTRICT OF CALIFORNIA 15 WESTERN DIVISION 16 17 18 SECURITIES AND EXCHANGE Case No. CV18-4315-DSF (JPRx) COMMISSION, 19 [PROPOSED] ORDER GRANTING Plaintiff, STIPULATION FOR 20 MODIFICATION OF ASSET 21 FREEZE: (1) TO ALLOW PAYMENT VS. OF NECESSARY AND 22 TITANIUM BLOCKCHAIN REASONABLE LIVING EXPENSES INFRASTRUCTURE SERVICES. OF DEFENDANT MICHAEL ALAN 23 INC.: EHI INTERNETWORK AND STOLLERY aka MICHAEL SYSTEMS MANAGEMENT, INC. 24 STOLLAIRE; AND (2) TO LIFT THE aka EHI-INSM, INC.; and MICHAEL ASSET FREEZE OVER 25 ALAN STOLLERY aka MICHAEL **DEFENDANT'S RETIREMENT** STOLLAIRE, **ACCOUNTS** 26 Defendants. 27 28

The Court, having considered the parties' Stipulation for Modification of Asset
Freeze: (1) To Allow Payment of Necessary and Reasonable Living Expenses of
Defendant Michael Alan Stollery aka Michael Stollaire; and (2) To Lift the Asset
Freeze Over Defendant's Retirement Accounts ("Stipulation"), and for good cause
shown, it is hereby ORDERED that the Stipulation is GRANTED and:
1. The Preliminary Injunction and Orders (1) Freezing Assets; (2)
Prohibiting the Destruction or Alteration of Documents; (3) Granting Expedited
Discovery; (4) Requiring Accountings; and (5) Appointing a Permanent Receiver
("Preliminary Injunction") (Dkt. No. 48) is hereby modified to permit Mr. Stollaire's
receipt of \$11,131.75 from the Wells Fargo Bank account ending in 5399 to pay his
necessary and reasonable living expenses; and
2. The Preliminary Injunction is hereby modified to lift the asset freeze
over the retirement accounts held at JP Morgan Securities LLC in the name of
Michael Alan Stollery, aka Michael Stollaire, ending in 7947, 7949, and 7950.
IT IS SO ORDERED.
Dated:, 2018
HONORABLE DALE S. FISCHER UNITED STATES DISTRICT JUDGE