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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**  
16 **Western Division**

17 **SECURITIES AND EXCHANGE**  
18 **COMMISSION,**

19 Plaintiff,

20 vs.

21 **TITANIUM BLOCKCHAIN**  
22 **INFRASTRUCTURE SERVICES,**  
23 **INC.; EHI INTERNETWORK AND**  
24 **SYSTEMS MANAGEMENT, INC.**  
**aka EHI-INSM, INC.; and MICHAEL**  
**ALAN STOLLERY aka MICHAEL**  
**STOLLAIRE,**

25 Defendants.  
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Case No. 2:18-cv-04315-DSF-JPR

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S NON-  
OPPOSITION TO RECEIVER'S  
MOTION FOR LEAVE TO  
PARTIALLY LIQUIDATE ASSETS  
(Dkt. No. 91)**

Date: December 2, 2019  
Time: 1:30 p.m.  
Place: Courtroom 7D  
Judge: Hon. Dales S. Fischer

1 Plaintiff Securities and Exchange Commission (“SEC”) has reviewed the  
2 Receiver’s Motion for Leave to Partially Liquidate Assets (Dkt. No. 91.) and, in light  
3 of the Receiver’s representation that he will only use the proceeds of the liquidation to  
4 pay expenses previously authorized by the Court and will file a separate application  
5 for approval of any expenses not previously authorized by the Court, respectfully  
6 states that it does not oppose the motion.

7  
8 Dated: November 7, 2019

Respectfully submitted,

9  
10 /s/ Douglas M. Miller  
11 Douglas M. Miller  
12 David S. Brown  
13 Attorneys for Plaintiff  
14 Securities and Exchange Commission  
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**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,  
444 S. Flower Street, Suite 900, Los Angeles, California 90071  
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On November 7, 2019, I caused to be served the document entitled **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S RESPONSE TO RECEIVER’S MOTION FOR LEAVE TO PARTIALLY LIQUIDATE ASSETS (Dkt. No. 91)** on all the parties to this action addressed as stated on the attached service list:

**OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

**PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

**EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

**HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

**UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

**ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

**E-FILING:** By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

**FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: November 7, 2019

/s/ Douglas M. Miller

Douglas M. Miller

**SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.**  
**United States District Court – Central District of California**  
**Case No. 2:18-cv-04315-DSF-JPR**

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