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13 *Receiver for Receivership Entities*

14 (Additional counsel listed on signature page)

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA 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.  
25 aka EHI-INSM, INC.; and MICHAEL  
26 ALAN STOLLERY aka MICHAEL  
27 STOLLAIRE,

28 Defendants.

Case No. CV18-4315-DSF (JPRx)

**STIPULATION AND REQUEST FOR  
MODIFICATION OF ASSET FREEZE  
TO ALLOW RELEASE OF FROZEN  
ASSETS TO THE COURT-  
APPOINTED RECEIVER;  
[PROPOSED] ORDER**

1                                    **STIPULATION AND REQUEST FOR**  
2                                    **ORDER TO MODIFY ASSET FREEZE**

3                    Plaintiff Securities and Exchange Commission (“SEC”), defendants Michael  
4 Alan Stollery aka Michael Stollaire (“Stollaire”), EHI Internetwork and Systems  
5 Management, Inc., aka EHI-INSM, Inc. (“EHI”), and Josias N. Dewey (“Dewey”), as  
6 court-appointed receiver for defendant Titanium Blockchain Infrastructure Services,  
7 Inc. (“TBIS”), by and through their undersigned counsel, and non-party Richard  
8 Silver (“Silver”), stipulate and agree as follows:

9                    WHEREAS, on May 22, 2018, the SEC filed this securities fraud action  
10 against Defendants Stollaire, TBIS, and EHI (collectively, “Defendants”);

11                    WHEREAS, on May 23, 2018, the Court entered the Temporary Restraining  
12 Order and Orders (1) Freezing Assets; (2) Prohibiting the Destruction or Alteration of  
13 Documents; (3) Granting Expedited Discovery; (4) Requiring Accountings; and (5)  
14 Appointing a Temporary Receiver; and Order to Show Cause Re Preliminary  
15 Injunction and Appointment of a Permanent Receiver (“TRO”) (Dkt. No. 2) that,  
16 among other things, temporarily restrained and enjoined Defendants from transferring  
17 ... any funds, securities, claims or other real or personal property, including any  
18 digital assets, digital currencies, virtual currencies, digital tokens, cryptocurrencies,  
19 digital wallets, or other tangible, intangible, or digital assets, wherever located, of any  
20 of the Defendants, or their subsidiaries or affiliates, owned by, controlled by,  
21 managed by, or in the possession or custody of any of them ....”;

22                    WHEREAS, the TRO ordered an immediate freeze on all monies and assets,  
23 including “all digital assets, digital currencies, virtual currencies, digital tokens,  
24 cryptocurrencies, digital wallets, or other tangible, intangible, and digital funds or  
25 assets, wherever located (with an allowance for necessary and reasonable living  
26 expenses to be granted only upon good cause shown by application to the Court with  
27 notice to and an opportunity for the SEC to be heard) in all accounts at any bank,  
28 financial institution, brokerage firm, third-payment payment processor, coin

1 exchange, or any other holder or custodian of any digital assets, digital currencies,  
2 virtual currencies, digital tokens, cryptocurrencies, digital wallets, or other tangible,  
3 intangible, or digital funds or assets held in the name of, for the benefit of, or over  
4 which account authority is held by defendants TBIS, EHI, and/or Stollaire....”;

5 WHEREAS, the TRO appointed Dewey as temporary receiver of defendant  
6 TBIS and its subsidiaries and affiliates;

7 WHEREAS, on May 30, 2018, the Court, pursuant to the Defendants’ consent,  
8 entered a Preliminary Injunction and Orders (1) Freezing Assets; (2) Prohibiting the  
9 Destruction or Alteration of Documents; (3) Granting Expedited Discovery; (4)  
10 Requiring Accountings; and (5) Appointing a Permanent Receiver (“Preliminary  
11 Injunction”) (Dkt. No. 48), which continued the same prohibitions against the  
12 transfers of funds and assets and the same asset freeze provisions that had been  
13 ordered by the TRO, and appointed Dewey as permanent receiver of defendant TBIS  
14 and its subsidiaries and affiliates;

15 WHEREAS, Paragraph XI of the Preliminary Injunction provides that “Josias  
16 N. Dewey...is immediately authorized, empowered and directed: A. to have access  
17 to and to collect and take custody, control, possession, and charge of all funds, assets  
18 (including any digital assets, digital currencies, virtual currencies, digital tokens of  
19 any kind, cryptocurrencies, digital wallets, or private keys associated with any of the  
20 foregoing, whether encrypted or not, or other tangible, intangible, or digital assets,  
21 wherever located), collateral, premises (whether owned, leased, pledged as collateral,  
22 occupied, or otherwise controlled), choses in action, books, records, papers, and other  
23 real or personal property, wherever located, of or managed by defendants TBIS and  
24 its subsidiaries and affiliates (collectively, the “Assets”), with full power to sue,  
25 foreclose, marshal, collect, receive, and take into possession all such Assets  
26 (including access to and taking custody, control, and possession of all such  
27 Assets)...C. to have control of, and to be added as the sole authorized signatory for,  
28 all accounts of the entities in receivership, including all accounts at any bank, title

1 company, escrow agent, financial institution, brokerage firm (including any futures  
2 commission merchant), or coin exchange, which has possession, custody or control of  
3 any Assets, or which maintains accounts over which defendant TBIS, and its  
4 subsidiaries and affiliates, and/or any of their employees or agents have signatory  
5 authority”;

6 WHEREAS, Dewey, as receiver, has determined that non-party Coinbase, Inc.  
7 (“Coinbase”), a licensed and regulated coin exchange, is in possession of certain  
8 cryptocurrency that is the property of TBIS, which is currently being held in a  
9 Coinbase account in the name of Silver, with the following User ID:

10 \*\*\*\*\*451ad30 (the “Coinbase Assets”);

11 WHEREAS, Dewey, as receiver, previously demanded that Coinbase freeze  
12 the Coinbase Assets until such time as Dewey was able to ascertain the division of  
13 ownership, if any, of the Coinbase Assets vis-à-vis TBIS and Silver, and the funds  
14 were thereafter frozen pursuant to the Court’s order;

15 WHEREAS, Silver acknowledges that he obtained the Coinbase Assets while  
16 acting in his capacity as Chief Operating Officer of TBIS and that the Coinbase  
17 Assets are being held for the exclusive benefit and are the property of TBIS, with the  
18 exception of .89061484 bitcoin, which are his personal property (the “Silver Assets”);

19 WHEREAS, Dewey, as receiver, has requested that Coinbase release, to a  
20 Coinbase account established by Dewey (the “Coinbase Receivership Account”), all  
21 Coinbase Assets in its possession and presently frozen, pursuant to this Court’s  
22 orders;

23 WHEREAS, Coinbase has requested that Dewey seek an order from this Court  
24 authorizing the release of the Coinbase Assets in the manner requested by Dewey;

25 WHEREAS, neither the SEC nor Stollaire nor Silver object to the Court’s  
26 issuance of an order modifying the asset freeze provisions of the Preliminary  
27 Injunction to permit the immediate release of the Coinbase Assets to the Coinbase  
28 Receivership Account, and to release the remaining Silver Assets as directed by

1 Silver;

2 WHEREAS, the undersigned parties agree that this Stipulation for  
3 Modification of the Court’s Asset Freeze Order is made without prejudice to Dewey,  
4 as receiver, later seeking further modification to the asset freeze and/or exercising his  
5 powers to take custody of TBIS’s assets under the May 30, 2018, Preliminary  
6 Injunction;

7 NOW, THEREFORE, the parties hereby stipulate that good cause exists for the  
8 Court’s issuance of the attached [*Proposed*] Order:

- 9 • Modifying the asset freeze provisions of the Preliminary Injunction to  
10 authorize and direct Coinbase to release the Coinbase Assets to Dewey  
11 and transfer them to the Coinbase Receivership Account; and
- 12 • Modifying the asset freeze provisions of the Preliminary Injunction, to  
13 the extent applicable, to authorize and direct Coinbase to release the  
14 Silver Assets to Silver, to thereafter be disposed of at his sole direction  
15 and control.

16 IT IS SO STIPULATED.

17 Dated: March 14, 2019

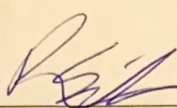
18 /s/ - Douglas M. Miller  
19 Douglas M. Miller  
20 David S. Brown  
21 Counsel for Plaintiff Securities and Exchange  
22 Commission

23 Dated: March 14, 2019

24 /s/ - Jose Casal  
25 Jose Casal (*pro hac vice*)  
26 Holland & Knight LLP  
27 Counsel for Josias N. Dewey, Court-appointed  
28 permanent receiver for Defendant Titanium  
Blockchain Infrastructure Services, Inc.

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Dated: 3-16, 2019

  
\_\_\_\_\_  
Richard Silver, an individual, and as account  
holder of Coinbase, Inc. account no.  
\*\*\*\*\*451ad30

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Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
Andrew B. Holmes  
Holmes, Taylor, Scott & Jones LLP

Counsel for Defendants Michael Alan Stollery  
aka Michael Stollaire and EHI Internetwork  
and Systems Management, Inc., aka EHI-  
INSM, Inc.

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Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
Richard Silver, an individual, and as account  
holder of Coinbase, Inc. account no.  
\*\*\*\*\*451ad30

Dated: March 14, 2019

\_\_\_\_\_  
/s/ - Andrew B. Holmes  
Andrew B. Holmes  
Holmes, Taylor, Scott & Jones LLP

Counsel for Defendants Michael Alan Stollery  
aka Michael Stollaire and EHI Internetwork  
and Systems Management, Inc., aka EHI-  
INSM, Inc.

**Signature Certification // Authorization to File**

Pursuant to Local Rule 5-4.3.4, I hereby certify that the content of this document is acceptable to Mr. Douglas M. Miller, Counsel for Plaintiff Securities and Exchange Commission, Mr. Jose Casal, Counsel for Josias N. Dewey, Court-appointed permanent receiver for Defendant Titanium Blockchain Infrastructure Services, Inc., and Mr. Andrew B. Holmes, Counsel for Defendants Michael Alan Stollery aka Michael Stollaire and EHI Internetwork and Systems Management, Inc., aka EHI-INSM, Inc., and that I have obtained each of their authorization to affix their electronic signature to this document (authorization received on the dates noted).

By: \_\_\_\_\_ //S//  
Kristina S. Azlin

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

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

Defendants.

Case No. CV18-4315-DSF (JPRx)

***[PROPOSED]* ORDER GRANTING  
STIPULATION AND REQUEST FOR  
MODIFICATION OF ASSET FREEZE  
TO ALLOW RELEASE OF FROZEN  
ASSETS TO THE COURT-  
APPOINTED RECEIVER**



**[PROPOSED] ORDER**

The Court, having considered the parties’ Stipulation for Modification of Asset Freeze to Allow Release of Frozen Assets to the Court-Appointed Receiver (“Stipulation”), and for good cause shown, it is hereby ORDERED that the Stipulation is GRANTED and 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 the release of frozen assets held by non-party Coinbase, Inc. (“Coinbase”), a licensed and regulated coin exchange, as follows:

1. Coinbase is authorized to release all bitcoin which is currently being held in a Coinbase account in the name of Mr. Richard Silver, under User ID \*\*\*\*\*451ad30, to Mr. Josias N. Dewey (“Dewey”), as the Court-appointed receiver for Titanium Blockchain Infrastructure Services, Inc. (“TBIS”), to be deposited into to a Coinbase account established by Mr. Dewey, with the exception of .89061484 bitcoin, which are the personal property of Mr. Silver (the “Silver Assets”); and
2. Coinbase is authorized to release the Silver Assets to the possession, custody, and control of Mr. Richard Silver, to be thereafter disposed of at Mr. Silver’s sole direction.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
HONORABLE DALE S. FISCHER  
UNITED STATES DISTRICT JUDGE