

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

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. 18-4315 DSF (JPRx)

**[PROPOSED] ORDER APPROVING  
OF RECEIVER’S RETENTION OF  
KROLL CYBER SECURITY AS  
FORENSIC EXPERT AND  
INVESTIGATIVE CONSULTANT**

1 **[PROPOSED] ORDER**  
2 **RECOGNIZING AND APPROVING OF RECEIVER’S RETENTION OF**  
3 **KROLL CYBER SECURITY AS FORENSIC EXPERT AND**  
4 **INVESTIGATIVE CONSULTANT**

5 On May 23, 2018, the Court entered an order temporarily freezing all assets of  
6 Defendant Titanium Blockchain Infrastructure Services, Inc. and its subsidiaries and/or  
7 affiliates (collectively the “Receivership Entities”) and appointing Josias Dewey to serve  
8 as the Temporary Receiver (the “Receiver”) for the Receivership Entities. Among other  
9 powers, that Order authorized the Receiver, among other things: “to choose, engage, and  
10 employ attorneys, accountants, appraisers, and other independent contractors and  
11 technical specialists, as the receiver deems advisable or necessary in the performance of  
12 duties and responsibilities under the authority granted by this Order . . . .” TRO at § XI(F).

13 On May 30, 2018, the Court entered a Preliminary Injunction and Order, *inter alia*,  
14 appointing Mr. Dewey as the Permanent Receiver. D.E. No. 48 (the Preliminary Injunction  
15 (“PI”) Order). The PI Order authorizes the Receiver, among other things: “to choose,  
16 engage, and employ attorneys, accountants, appraisers, and other independent contractors  
17 and technical specialists, as the receiver deems advisable or necessary in the performance  
18 of duties and responsibilities under the authority granted by this Preliminary Injunction,  
19 including but not limited to, the law firm in which the receiver is a partner.” PI Order at  
20 Section XI(F).

21 On June 4, 2018, the Receiver filed a Notice and Request For Order giving notice  
22 and requesting the Court’s approval of its retention of Kroll Cyber Security as his Forensic  
23 Expert and Investigative Consultant in this matter.

24 After considering the Receiver’s Notice and Request For Order, the Receiver’s  
25 request is **GRANTED**. The Court hereby approves of the Receiver’s retention of Kroll  
26 Cyber Security to assist him as needed to carry out his duties on the terms set forth in the  
27 Notice and Request For Order.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SO ORDERED.**

June \_\_, 2018

---

**DALE S. FISCHER**  
**UNITED STATES DISTRICT JUDGE**