



seal the entire case file. The SEC makes this motion because general knowledge of this proceeding prior to the execution of the requested relief could substantially frustrate the purposes of such relief – particularly the possible dissipation of ill-gotten gains, as reflected in the Rule 65(b) Certification in Support of Motion for Temporary Restraining Order and Ancillary Relief, which has been filed contemporaneously herewith.

The attached proposed order should afford the SEC sufficient time to allow service of papers upon defendants and the financial institutions and/or third parties with custody of their assets.

WHEREFORE, plaintiff United States Securities and Exchange Commission respectfully requests that the Court grant its motion, enter the proposed order granting it leave to make filings in this matter under seal and temporarily sealing the entire case file in this matter, and grant such other and further relief as the Court deems just and proper.

Dated: December 1, 2021

Respectfully submitted,

**UNITED STATES SECURITIES  
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