

2. To date, counsel for the Sahota Defendants have negotiated the terms of a (a) preliminary injunction (Dkt. 38), (b) filed an answer on behalf of each of the Sahota Defendants, and (c) negotiated a judgment with respect to liability in this matter (Dkt. 133-136). Counsel also filed a motion to modify the asset freeze order so that, among other things, the Sahota Defendants could have access to funds for living expenses and legal fees. (Dkt. 129). The Court, however, denied the Sahota Defendants' motion. (Dkt. 195).

3. The Sahota Defendants do not have access to funds to satisfy their ongoing legal defense costs and counsel for the Sahota Defendants now seek the Court's permission to withdraw from the case.

4. The Sahota Defendants consent to the withdrawal of counsel as reflected below.

5. Counsel for the Sahota Defendants do not represent any of the corporate entities that are identified as defendants or relief defendants in this action.

6. This motion and request for withdrawal is not sought to delay these proceedings, and neither the Plaintiff Securities and Exchange Commission nor the Receiver opposes the relief sought herein.

Accordingly, counsel for the Sahota Defendants, Jeffrey Ansley of Vedder Price PC and Kevin Edmundson and Jesse Weiss of Edmundson Shelton Weiss PLLC, respectfully request that the Court grant this motion to withdraw.

Respectfully submitted,

VEDDER PRICE PC

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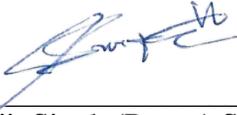
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COUNSEL FOR SAHOTA DEFENDANTS

CLIENT CONSENT

The Sahota Defendants consent to the withdrawal of counsel as stated herein.



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CERTIFICATE OF CONFERENCE

Counsel for the Sahota Defendants have conferred with counsel for the SEC and the Receiver. They do not oppose the relief sought in this motion.

CERTIFICATE OF SERVICE

I do hereby certify that on May 27, 2022, a true and correct copy of the above and foregoing instrument was filed electronically through the Court's CM/ECF system, which will give notice of this filing to all parties.

/s/ Jeffrey J. Ansley
Jeffrey J. Ansley