

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TERRAFORM LABS PTE. LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-10070 (BLS)
)
) (Jointly Administered)
)

NOTICE OF DEADLINE FOR THE FILING OF CRYPTO LOSS CLAIMS

**THE CRYPTO LOSS CLAIM BAR DATE IS APRIL 30, 2025 AT 11:59 P.M.
(PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE OF THE FOLLOWING:

Deadline for Filing Crypto Loss Claims. On March 12, 2025, the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) entered an order [Docket No. 965] (the “CLC Bar Date Order”) establishing a deadline for the filing of proofs of claim on account of Crypto Loss Claims in the chapter 11 cases of the Terraform Wind Down Trust on behalf of the jointly-administered estates of Terraform Labs Pte. Ltd., *et al.* (collectively, the “Post-Effective Date Debtors,” and, prior to the Effective Date, the “Debtors”).

TO:	ALL PERSONS AND ENTITIES WHO MAY HAVE CLAIMS AGAINST ANY OF THE FOLLOWING DEBTOR ENTITIES:	
	DEBTOR	CASE NO.
	Terraform Labs Pte. Ltd. (“TFL”)	24-10070
	Terraform Labs Limited (“TLL”)	24-11481

The CLC Bar Date. Pursuant to the CLC Bar Date Order, ***all*** entities, including individuals, partnerships, estates, and trusts, who have a Crypto Loss Claim against the Debtors that arose before January 21, 2024 (the “Petition Date”), no matter how remote or contingent such right to payment or equitable remedy may be, **MUST FILE A CLC FORM** on or before ***April 30, 2025 at 11:59 p.m.*** (prevailing Eastern Time) (the “CLC Bar Date”).

Filing a CLC Form. Each CLC Form must be filed, including supporting documentation, so as to be **actually received** by the Wind Down Trust’s notice and claims agent, Kroll

¹ The Post-Effective Date Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Post-Effective Date Debtors’ principal offices are located at 10 Anson Road, #10-10 International Plaza, Singapore 079903. The Plan Administrator of the Post-Effective Date Debtors is Todd R. Snyder. The Plan Administrator’s principal office is located at 1251 Avenue of the Americas, New York, New York 10020.

Restructuring Administration (“Kroll”), on or before the CLC Bar Date electronically through the Online Portal available at claims.terra.money.

Contents of CLC Form. Each CLC Form must be completed in its entirety in accordance with the CLC Procedures, including as follows:

Part I: Identifying Information: To complete Part I of the CLC Form, you must provide all requested claimant details and contact information. Claimants holding Multisig Wallets must submit a list of signatories (with each signatory’s wallet address and contact email) and the wallet address of the Multisig Wallet. Please note that all correspondence will be sent to your provided email address.

Part II: Crypto Holdings and Evidentiary Support: The CLC Form allows you to submit two types of evidence: (i) preferred evidence (“Preferred Evidence”) and (ii) manual evidence (“Manual Evidence”). Preferred Evidence includes (a) your blockchain and/or wallet addresses, for Eligible Loss Cryptocurrency held on Verifiable Blockchains, and (b) read-only API Keys, for Eligible Loss Cryptocurrency held on other platforms or exchanges. Manual Evidence includes screenshots, excel logs, or PDFs generated by the applicable exchange showing account balances, transaction logs, and deposit logs. For the avoidance of doubt, Manual Evidence will not be accepted for Eligible Loss Cryptocurrency held on Verifiable Blockchains.

To complete Part II, you must provide evidentiary support for all Eligible Loss Cryptocurrency underlying your Crypto Loss Claim, across all exchanges and wallets on which you hold Eligible Loss Cryptocurrency, in accordance with the CLC Procedures.

If you choose to submit Manual Evidence to support portions of your Crypto Loss Claim for which a read-only API Key is available, or if you submit Manual Evidence because the applicable blockchain, platform, or exchange on which you held Eligible Loss Cryptocurrency does not support Preferred Evidence, your claim will not receive an Initial Determination on the expedited timeline set forth below and your claim will be subject to Individualized Review (as defined below). The Plan Administrator may take additional time to review your Crypto Loss Claim and provide an Initial Determination. Because Preferred Evidence (including read-only API Keys) is both likely to be (a) the most readily available evidentiary support for large exchanges and platforms and (b) the most accurate and reliable support for Crypto Loss Claims (because it cannot be manipulated or altered), the Plan Administrator may also determine that your Crypto Loss Amount should not be Allowed if you do not provide Preferred Evidence, especially if Preferred Evidence is available and you choose not to provide it. Specifically, the Plan Administrator is likely to seek to disallow your Crypto Loss Claim in whole or in part if you provide Manual Evidence instead of Preferred Evidence if Preferred Evidence is available, which determination will be subject to the dispute process set forth in Section V.c of the CLC Procedures.

It is strongly recommended that you submit read-only API Keys to support your Crypto Loss Claim in order to quickly verify your Crypto Loss Amount and provide quick distributions on account of your Allowed Crypto Loss Claim more quickly.

Part III: Supporting Documents for Claim: To complete Part III, you must include all applicable supporting documentation and check the applicable boxes for the documents you are enclosing. Failure to provide supporting documentation may lead to your claim being disallowed. All applicable supporting documentation, including but not limited to any blockchain or wallet addresses, any read-only API Keys, and any account balance statements, transaction logs, and contracts or trade agreements governing ownership or transfer of the tokens must be attached to your CLC Form unless it is included in the CLC Form itself.

Part IV: Contributed Claims: If you purchased your Eligible Loss Cryptocurrency and believe that you may have a claim against third parties (*i.e.*, any persons or entities other than the Debtors), then you have the option to irrevocably contribute such claims to the Wind Down Trust (“Contributed Claims”). In accordance with the Plan and the Wind Down Trust Agreement, the Plan Administrator will review your Contributed Claims and exercise his business judgment in determining whether to pursue such claim. Such claims may be adjudicated in litigation, binding arbitration, or another forum provided by law. If the Plan Administrator pursues your third-party claim, you may be asked to provide additional information and documents. A claimant’s decision on whether to contribute any third-party claims to the Wind Down Trust will not affect the Plan Administrator’s valuation or adjudication of their Crypto Loss Claim. Any proceeds of contributed claims that are included in distributions under the Plan will be distributed pro rata to all holders of Allowed Crypto Loss Claims and will not be made only to creditors who elected to contribute claims to the Wind Down Trust.

Part V: Certification: To complete Part V and submit the CLC Form, you must certify under penalty of perjury that all statements you gave in the CLC Form were true and correct to the best of your knowledge. Your digital date stamped signature will be deemed an original signature.

Miscellaneous Provisions:

Contents. Each CLC Form must: (i) be submitted in English; (ii) be fully complete using the CLC Form provided by the Wind Down Trust; (iii) include the supporting documentation requested by the CLC Form; and (iv) be digitally signed by the claimant or by an authorized agent or legal representative of the claimant.

Online Portal Notifications. By registering to submit an Eligible Crypto Loss Claim via the Online Portal, the Wind Down Trust can track claimants’ progress and notify them of the status of their claim and/or request additional information. _

Timely Service. Each CLC Form must be filed, including supporting documentation, so as to be **actually received** through the Online Portal on or before the CLC Bar Date. The Online Portal will be open for submission for Crypto Loss Claims on ***March 31, 2025 through April 30, 2025 at 11:59 p.m. (prevailing Eastern Time)***. In the event the Online Portal is available before or after March 31, 2025, the Plan Administrator will file a notice on the docket indicating when the Online Portal will be available.

Phishing Attempts. If you see any suspicious website domains or receive any uncorroborated email, text message, or telephone calls purporting to be from the Plan Administrator or the Wind Down Trust or their advisors claiming that withdrawals are available

or requesting account information, personal information, or payment, we request that you please immediately contact the Wind Down Trust's advisors by contacting Kroll at Terraforminfo@ra.kroll.com.

Additional Information. If you require additional information regarding the filing of a CLC Form, you may contact the Wind Down Trust's claims agent for Crypto Loss Claims, Kroll, by calling Kroll's toll-free helpline at: (888) 341-7383 (U.S. & Canada) or +1 (646) 876-2651 (International), or via email at Terraforminfo@ra.kroll.com. **Please note** that Kroll **cannot** offer legal advice or advise whether you should file a proof of claim.

If you require additional information regarding the filing of an Eligible Crypto Loss Claim, you may call Kroll's toll-free helpline (888) 341-7383 (US/Canada Toll Free) / +1 (646) 876-2651 (International).

**A HOLDER OF A POSSIBLE CRYPTO LOSS CLAIM AGAINST THE DEBTORS
SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED
BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A CLC
FORM.**

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claims.terra.money