

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

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD. and FTX
TRADING LTD.,

Plaintiffs,

- against -

PLATFORM LIFE SCIENCES INC., LUMEN
BIOSCIENCE, INC., GREENLIGHT
BIOSCIENCES HOLDINGS, PBC,
RIBOSCIENCE LLC, GENETIC NETWORKS
LLC, 4J THERAPEUTICS INC., LATONA
BIOSCIENCES GROUP, FTX FOUNDATION,
SAMUEL BANKMAN-FRIED, ROSS
RHEINGANS-YOO, and NICHOLAS
BECKSTEAD,

Defendants.

Adv. Pro. No. 23-50444 (JTD)

VOLUNTARY NOTICE OF DISMISSAL WITH PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), made applicable to this adversary proceeding by Fed. R. Bankr. P. 7041, Plaintiffs Alameda Research Ltd. and FTX Trading Ltd. (“Plaintiffs”), by and through their undersigned counsel, hereby voluntarily dismiss all claims in the above-captioned adversary proceeding against Defendants Ross Rheingans-Yoo (“Rheingans-Yoo”) and

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Latona Biosciences Group (“Latona”) with prejudice, provided, however, that such dismissal shall become null and void should Plaintiffs notify the United States Bankruptcy Court for the District of Delaware of the occurrence of any of the following events, which constitute breaches of the *Settlement Stipulation with Latona Biosciences Group and Ross Rheingans-Yoo* (the “Settlement Stipulation”) [Adv. D.I. 106-1]: (i) Rheingans Yoo or Latona fails to produce to Plaintiffs by August 5, 2024 all documents in their possession, custody, or control as required by paragraph 6(a) of the Settlement Stipulation; (ii) Rheingans-Yoo fails to appear for the interview as required by paragraph 6(b) of the Settlement Stipulation; or (iii) Rheingans-Yoo fails to accept service of a subpoena for and/or appear for his deposition and/or the 30(b)(6) deposition of Latona, as required by paragraph 6(c) of the Settlement Stipulation.

Dated: July 12, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

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