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

Chapter 11

In re:

FTX TRADING LTD., et al., 1 Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

ALAMEDA RESEARCH LLC, FTX TRADING LTD., WEST REALM SHIRES, INC., AND WEST REALM SHIRES SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v. Adv. Pro. No. 23-50419 (JTD)

DANIEL FRIEDBERG,

Defendant.

FTX TRADING LTD., ALAMEDA RESEARCH LTD., WEST REALM SHIRES, INC., WEST REALM SHIRES SERVICES, INC., and NORTH DIMENSION INC.,

Plaintiffs,

- against -

CENTER FOR APPLIED RATIONALITY, LIGHTCONE INFRASTRUCTURE, INC., LIGHTCONE ROSE GARDEN LLC and FTX FOUNDATION,

Defendants.

Adv. Pro. No. 24-50066 (JTD)

The last four digits of FTX Trading Ltd.'s FTX Trading Ltd.'s and Alameda Research LLC's tax identification number 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.

FTX TRADING LTD., et al.,

Plaintiffs,

-against-

ALEXANDER CHERNYAVSKY, BRANDON ORR, CHUKWUDOZIE EZEOKOLI, EDWIN GARRISON, GREGG PODALSKY, JULIE PAPADAKIS, KYLE RUPPRECHT, LEANDRO CABO, MICHAEL LIVIERATOS, MICHAEL NORRIS, RYAN HENDERSON, SHENGYUN HUANG, SUNIL KAVURI, VIJETH SHETTY, VITOR VOZZA, and WARREN WINTER,

Adv. Pro. No. 24-50072 (JTD)

Defendants.

NOTICE OF AGENDA FOR HEARING SCHEDULED FOR OCTOBER 22, 2024 AT 1:00 P.M. (ET), BEFORE THE HONORABLE JOHN T. DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801

ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY
PRESENT IN THE COURTROOM. ANY NON-PARTICIPANT MAY OBSERVE
THE HEARING REMOTELY BY REGISTERING IN ADVANCE AT THE LINK BELOW
NO LATER THAN OCTOBER 21, 2024 AT 4:00 P.M. (ET).

To attend this hearing remotely, please register using the <u>eCourt Appearances</u> tool on the Court's website at <u>www.deb.uscourts.gov</u>.

### **ADJOURNED MATTERS:**

1. Notice of Pretrial Conference in an Adversary Proceeding [*Alameda Research LLC*, et al. v. Friedberg, Adv. No. 23-50419 (JTD) – Adv. D.I. 7, filed on July 26, 2023]

Status: This matter is adjourned to a date to be determined.

2. Notice of Pretrial Conference in Adversary Proceeding [FTX Trading Ltd., et al. v. Center for Applied Rationality, et al., Adv. No. 24-50066 (JTD) – Adv. D.I. 3, filed on May 17, 2024]

Status: This matter is adjourned to a date to be determined.

3. Notice of Pretrial Conference in Adversary Proceeding [FTX Trading Ltd., et al., v. Chernyavsky, et al., Adv. No. 24-50072 (JTD) – Adv. D.I. 8, filed on June 26, 2024]

Status: This matter is adjourned to a date to be determined.

4. Motion of Olympus Peak Trade Claims Opportunities Fund I Non-ECI Master LP to Require Debtors' Claims and Noticing Agent to Recognize and Record Transfer of Claim to Olympus Peak Trade Claims Opportunities Fund I Non-ECI Master LP [D.I. 9289, filed on March 13, 2024]

Status: This matter is adjourned to the November 20, 2024 omnibus hearing.

5. Debtors' Fifty-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim [D.I. 19176 & 19185, filed on July 1, 2024]

<u>Status</u>: This matter is adjourned to the November 20, 2024 omnibus hearing with respect to Blooming Triumph International Limited's objection.

6. Debtors' Objection to Proofs of Claim Filed by North Field Technology Ltd. [D.I. 20017, filed on July 10, 2024]

Status: This matter is adjourned to the December 12, 2024 omnibus hearing.

7. Debtors' Objection to Proofs of Claim Filed by the Joint Liquidators of Three Arrows Capital Ltd. [D.I. 19797, filed on July 8, 2024]

Status: This matter is adjourned to the December 12, 2024 omnibus hearing.

8. Debtors' Objection to Proof of Claim Filed by SC30, Inc. [D.I. 19971, filed on July 10, 2024]

Status: This matter is adjourned to the December 12, 2024 omnibus hearing.

9. Debtors' Objection to Proofs of Claim Filed by Alex Mashinsky and Krissy Meehan [D.I. 20044, filed on July 10, 2024]

Status: This matter is adjourned to a date to be determined.

10. Debtors' Objection to Proofs of Claim Filed by Kariya Kayamori [D.I. 20046, filed on July 10, 2024]

Status: This matter is adjourned to the November 20, 2024 omnibus hearing.

11. Debtors' Objection to Proof of Claim Filed by ICC Business Corporation FZ LLC [D.I. 20007 & 21731, filed on July 10 & 26, 2024]

Status: This matter is adjourned to the November 20, 2024 omnibus hearing.

12. Debtors' Sixty-Ninth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23928 & 23967, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

13. Debtors' Seventieth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23929 & 23968, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

14. Debtors' Seventy-Second (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23931 & 23970, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

15. Debtors' Seventy-Third (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor [D.I. 23932 & 23971, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

16. Debtors' Seventy-Fourth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer and Non-Customer Claims) [D.I. 23933 & 23972, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

17. Debtors' Eighty-First (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23942 & 23979, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

18. Debtors' Eighty-Fourth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims) [D.I. 23953 & 23982, filed on August 28, 2024]

<u>Status</u>: The omnibus claim objection is being adjourned as it relates to certain claims for which the Debtors received responses. The Debtors intend to file a revised form of order to reflect such adjournments under certification of counsel.

## **RESOLVED MATTERS:**

19. Debtors' Sixty-Fourth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23923 & 23960, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

20. Debtors' Sixty-Fifth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23924 & 23961, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

21. Debtors' Sixty-Sixth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23925 & 23963, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

22. Debtors' Sixty-Seventh (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23926 & 23965, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

23. Debtors' Sixty-Eighth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23927 & 23966, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

24. Debtors' Seventy-First (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23930 & 23969, filed on August 28, 2024]

<u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.

- 25. Debtors' Seventy-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23934 & 23973, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 26. Debtors' Seventy-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23935 & 23974, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 27. Debtors' Seventy-Seventh (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23936 & 23975, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 28. Debtors' Seventy-Eighth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23938 & 23976, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 29. Debtors' Seventy-Ninth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23939 & 23977, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 30. Debtors' Eightieth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23941 & 23978, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 31. Debtors' Eighty-Second (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23943 & 23980, filed on August 28, 2024]

- <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 32. Debtors' Eighty-Third (Substantive) Omnibus Objection to Certain Duplicate Proofs of Claim (Customer Claims) [D.I. 23945 & 23981, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 33. Debtors' Eighty-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims) [D.I. 23954 & 23983, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 34. Debtors' Eighty-Sixth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims) [D.I. 23955 & 23984, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 35. Debtors' Eighty-Seventh (Substantive) Omnibus Objection to Certain Duplicate Proofs of Claim (Customer Claims) [D.I. 23956 & 23985, filed on August 28, 2024]
  - <u>Status</u>: The Debtors intend to file a certificate of no objection and submit an order for entry. Accordingly, a hearing regarding this matter is not required unless the Court has questions.
- 36. Motion of the Debtors for Entry of an Order (A) Authorizing the Debtors' Entry Into, and Performance Under, Settlement Agreement with Kroll Restructuring Administration LLC (B) Approving the Settlement Agreement, and (C) Granting Related Relief [D.I. 24016, filed on August 29, 2024]
  - <u>Status</u>: On September 16, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding the matter is not required.
- 37. Motion of the FTX Debtors and Emergent Fidelity Technologies Ltd for Entry of an Order (A) Authorizing the Entry into, and Performance Under, the Global Settlement Agreement Among the FTX Debtors, Emergent Fidelity Technologies Ltd, the Joint Liquidators, and Fulcrum Distressed Partners Limited; (B) Approving the Global Settlement Agreement; and (C) Granting Related Relief [D.I. 24320, filed on September 6, 2024]
  - <u>Status</u>: On October 10, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding the matter is not required.

38. Motion of the Debtors for Entry of an Order (A) Authorizing the Debtors to Enter into Stipulation with the State Governmental Claimants, (B) Approving the Stipulation and (C) Granting Related Relief [D.I. 25287, filed on September 19, 2024]

<u>Status</u>: On October 8, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding the matter is not required.

39. FTX Debtors' Motion for Entry of an Order (A) Authorizing the FTX Debtors' Entry Into, and Performance Under, the Global Settlement Agreement with the MDL Plaintiffs and MDL Counsel; (B) Approving the Global Settlement Agreement; and (C) Granting Related Relief [D.I. 25683, filed on September 25, 2024]

<u>Status</u>: On October 15, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding the matter is not required.

40. Motion of Debtors for Entry of an Order Further Extending the Time Period Within Which the Debtors May File Notices to Remove Actions Pursuant to 28 U.S.C. § 1452 and Rules 9027 and 9006 of the Federal Rules of Bankruptcy Procedure [D.I. 26123, filed on October 1, 2024]

<u>Status</u>: A certificate of no objection has been filed and an order uploaded for entry. Accordingly, a hearing regarding the matter is not required.

41. Motion of Debtors for Entry of an Order Dismissing the Chapter 11 Case of Digital Custody Inc. [D.I. 26131, filed on October 1, 2024]

<u>Status</u>: A certificate of no objection has been filed and an order uploaded for entry. Accordingly, a hearing regarding the matter is not required.

### **MATTER GOING FORWARD:**

42. Debtors' Objection to Proofs of Claim Filed by Seth Melamed [D.I. 20051, filed on July 10, 2024]

Response Deadline: August 16, 2024 at 4:00 p.m. (ET)

### Responses Received:

- A. Opposition to Debtors' Objection to Proofs of Claim [D.I. 23170, filed on August 16, 2024]
- B. Declaration of Takane Hori [D.I. 23171, filed on August 16, 2024]
- C. Declaration of Seth Melamed in Support of Opposition to Debtors' Objection to Proofs of Claim [D.I. 23172, filed on August 16, 2024]

D. Corrected Declaration of Seth Melamed in Support of Opposition to Debtors' Objection to Proofs of Claim [D.I. 23173, filed on August 17, 2024]

### Related Documents:

- A. Emergency Motion of Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on September 12, 2024 and (II) Extending the Deadline to File a Reply [D.I. 24427, filed on September 9, 2024]
- B. Declaration of Christopher J. Dunne in Support of Emergency Motion of Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on September 12, 2024 and (II) Extending the Deadline to File a Reply [D.I. 24428, filed on September 9, 2024]
- C. Order Granting for Entry of an Order Shortening the Time for the Emergency Motion of the Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on September 12, 2024 and (II) Extending the Deadline to File a Reply [D.I. 24958, entered on September 17, 2024]
- D. Emergency Motion of Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on October 22, 2024 and (II) Extending the Deadline to File a Reply [D.I. 26950, filed on October 17, 2024]
- E. Declaration of Christopher J. Dunne in Support of Emergency Motion of Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on October 22, 2024 and (II) Extending the Deadline to File a Reply [D.I. 26951, filed on October 17, 2022]
- F. Motion for Entry of an Order Shortening the Time for the Emergency Motion of the Debtors for Entry of an Order (I) Adjourning Certain Matters Set for Hearing on October 22, 2024 and (II) Extending the Deadline to File a Reply [D.I. 26952, filed on October 17, 2024]

<u>Status</u>: The Debtors have filed an emergency motion seeking adjournment of this matter to the December 12, 2024 omnibus hearing. This matter is going forward.

Dated: October 18, 2024 Wilmington, Delaware

#### LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

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