

**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 FILING OF JANUARY STATEMENT OF FEES PAID TO BITGO IN
CONNECTION WITH ORDER APPROVING IMPLEMENTATION STEPS IN COMPLIANCE
WITH TFL CONSENT AND FINAL JUDGMENT IN SEC ENFORCEMENT ACTIONS**

PLEASE TAKE NOTICE that on July 9, 2024, Terraform Labs Pte. Ltd. (“TFL”) and Terraform Labs Limited (collectively, the “Post-Effective Date Debtors” and, prior to the Effective Date, the “Debtors”) filed the *Motion of Debtors for Entry of Order Approving Implementation Steps in Compliance with TFL Consent and Final Judgment in SEC Enforcement Action* [Docket No. 435] (the “Motion”)² with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that on July 17, 2024, the Court entered the *Order Approving Implementation Steps in Compliance with TFL Consent and Final Judgment in SEC Enforcement Action* [Docket No. 479] (the “Implementation Order”). Pursuant to paragraph 4 of the Implementation Order, the Debtors were (i) authorized to enter into a custodial services agreement and a master purchase agreement in furtherance of the Debtors’ wind down under the TFL Consent and Final Judgment and (ii) required to file a statement of fees paid under the custodial services agreement and master purchase agreement within thirty (30) days after the end of each calendar month until completion of such services.

PLEASE TAKE FURTHER NOTICE that the Debtors entered into (i) a custodial services agreement with BitGo Trust Company, Inc. and (ii) a master purchase agreement with BitGo Prime, LLC (together with BitGo Trust Company, Inc., “BitGo”).

PLEASE TAKE FURTHER NOTICE that pursuant to the terms of the *Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited* [Docket No. 717] (the “Plan”), following the Effective Date, the Plan Administrator (as defined in the Plan) directs the actions of the Post-Effective Date Debtors to the extent set forth in the Plan.

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 4 of the Implementation Order, the Plan Administrator represents that the Post-Effective Date Debtors paid \$7,768.30 in fees to BitGo in January 2025.

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion, the Implementation Order (as defined herein) or the Plan (as defined herein), as applicable.

Dated: February 28, 2025
Wilmington, Delaware

/s/ Zachary I. Shapiro

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