

Darren Azman  
Joseph B. Evans  
**MCDERMOTT WILL & EMERY LLP**  
One Vanderbilt Avenue  
New York, New York 10017-3852  
Telephone: (212) 547-5400  
Facsimile: (212) 547-5444

Charles R. Gibbs (admitted *pro hac vice*)  
Grayson Williams (admitted *pro hac vice*)  
**MCDERMOTT WILL & EMERY LLP**  
2501 North Harwood Street, Suite 1900  
Dallas, Texas 75201-1664  
Telephone: (214) 295-8000  
Facsimile: (972) 232-3098

Gregg Steinman (admitted *pro hac vice*)  
**MCDERMOTT WILL & EMERY LLP**  
333 SE 2nd Avenue, Suite 4500  
Miami, FL 33131-2184  
Telephone: (305) 329-4473  
Facsimile: (305) 503-8805

*Counsel to the Official Committee of  
Unsecured Creditors of Voyager Digital Holdings, Inc., et al.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	)	
In re	)	Chapter 11
	)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	)	Case No. 22-10943 (MEW)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

---

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS’ NOTICE OF  
SUBPOENA TO CAROLINE ELLISON**

Pursuant to Federal Rule of Civil Procedure 45, as made applicable to this proceeding through Rule 9016 of the Federal Rules of Bankruptcy Procedure, the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., *et al.* (the “Committee”), by and through its undersigned counsel, has served a *Subpoena to Testify at a Deposition in a Bankruptcy Case (or Adversary Proceeding)* on Caroline Ellison, requesting that she produce all Documents and

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

Communications responsive to the document requests set forth in Attachment A thereto, in the manner provided in the Definitions and Instructions set forth therein, at the offices of McDermott Will & Emery LLP, 200 Clarendon Street, Floor 58, Boston, Massachusetts 02116-5021, no later than **February 20, 2023**, or by such other date as may be agreed to by the parties or ordered by the Bankruptcy Court, and requesting that she appear for a remote deposition on **February 24, 2023**, commencing at **10:00 AM (prevailing Eastern Time)** at the offices of McDermott Will & Emery LLP, 200 Clarendon Street, Floor 58, Boston, Massachusetts 02116-5021, or at such other time and place mutually acceptable to counsel.

Dated: New York, New York  
February 18, 2023

**MCDERMOTT WILL & EMERY LLP**

*/s/ Joseph B. Evans*

Darren Azman

Joseph B. Evans

One Vanderbilt Avenue

New York, NY 10017-3852

Telephone: (212) 547-5400

Facsimile: (212) 547-5444

dazman@mwe.com

jbevans@mwe.com

*Counsel for the Official Committee of  
Unsecured Creditors*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy the foregoing *Notice of Subpoena* was served on February 18, 2023, by (i) electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York upon all registered users thereof entitled to receive notices in these chapter 11 cases, and (ii) by e-mail on upon the following additional parties:

Joshua A. Sussberg, P.C.  
Christopher Marcus, P.C.  
Christine A. Okike, P.C.  
Allyson B. Smith  
KIRKLAND & ELLIS LLP  
KIRKLAND & ELLIS INTERNATIONAL  
LLP  
601 Lexington Avenue  
New York, New York 10022  
E-mail: jsussberg@kirkland.com  
cmarcus@kirkland.com  
christine.okike@kirkland.com  
allyson.smith@kirkland.com

Robert M. Katz  
Daniel Mun  
Adam J. Goldberg  
Andrew D. Sorkin  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, New York 10020  
E-mail: Robert.Katz@lw.com  
Daniel.Mun@lw.com  
Adam.Goldberg@lw.com  
Andrew.Sorkin@lw.com

*Counsel for Binance*

*Counsel for the Debtors*

Peter Neiman  
Anjan Sahni  
Nick Werle  
WILMERHAILE  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
E-mail: Peter.Neiman@wilmerhale.com  
Anjan.Sahni@wilmerhale.com  
Nick.Werle@wilmerhale.com

Office of the United States Trustee for the  
Southern District of New York  
Attn: Richard C. Morrissey and Mark Bruh  
201 Varick Street, Room 1006  
New York, New York 10004  
E-mail: Richard.Morrissey@usdoj.gov  
Mark.Bruh@usdoj.gov

Stephanie Avakian  
WILMERHAILE  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
E-mail:  
Stephanie.Avakian@wilmerhale.com

*Counsel for Caroline Ellison*

*/s/ Joseph B. Evans*

---

Joseph B. Evans