DOUGLAS M. MILLER (Cal. Bar No. 240398) 1 Email: millerdou@sec.gov DAVID S. BROWN (Căl. Bar No. 134569) 2 Email: browndav@sec.gov 3 Attorneys for Plaintiff 4 Securities and Exchange Commission 5 Joseph G. Sansone, Unit Chief (Market Abuse Unit) New York Regional Office 200 Vesey Street, Suite 400 New York, New York 10281 6 7 Robert A. Cohen, Unit Chief (Cyber Unit) 8 Headquarters 100 F Street, N.E. 9 Washington, District of Columbia 20549 10 Michele Wein Layne, Regional Director Gary Y. Leung, Regional Trial Counsel 11 444 S. Flower Street, Suite 900 Los Angeles, California 90071 Telephone: (323) 965-3998 Facsimile: (213) 443-1904 12 13 14 UNITED STATES DISTRICT COURT 15 CENTRAL DISTRICT OF CALIFORNIA 16 **Western Division** 17 SECURITIES AND EXCHANGE Case No. 2:18-cv-04315-DSF-JPR 18 COMMISSION, PLAINTIFF SECURITIES AND 19 **EXCHANGE COMMISSION'S NON-**Plaintiff, **OPPOSITION TO THIRD INTERIM** 20 FEE APPLICATION OF HOLLAND VS. & KNIGHT, LLP, AS COUNSEL TO RECEIVER, FOR ALLOWANCE OF 21 TITANIUM BLOCKCHAIN INFRASTRUCTURE SERVICES. **COMPENSÁTION AND** 22 INC.; EHI INTERNETWORK AND REIMBURSEMENT OF EXPENSES SYSTEMS MANAGEMENT, INC. (Dkt. No. 110) 23 aka EHI-INSM, INC.; and MICHAEL ALAN STOLLERY aka MICHAEL Date: September 12, 2022 24 STOLLAIRE, Time: 1:30 p.m. Place: Courtroom 7D 25 Defendants. Hon. Dales S. Fischer Judge: 26 27

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I. <u>INTRODUCTION</u>

Plaintiff Securities and Exchange Commission ("SEC") respectfully states that it does not oppose the Third Interim Fee Application of Holland & Knight, LLP ("Holland & Knight"), as Counsel to Receiver, for Allowance of Compensation and Reimbursement of Expenses. (Dkt. No. 110.) After careful review of the fees and work done, the SEC concurs that Holland & Knight worked efficiently, and that the work done was reasonable and necessary to the management of the receivership estate.

II. <u>CONCLUSION</u>

Accordingly, the SEC does not oppose the interim payment of fees in this case, and supports the request made in the Third Interim Fee Application of Holland & Knight.

Dated: August 19, 2022 Respectfully submitted,

15 | /s/ Douglas M. Miller

Douglas M. Miller

David S. Brown

Attorneys for Plaintiff

Securities and Exchange Commission

PROOF OF SERVICE 1 I am over the age of 18 years and not a party to this action. My business address is: 2 3 U.S. SECURITIES AND EXCHANGE COMMISSION, 444 S. Flower Street, Suite 900, Los Angeles, California 90071 Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904. 4 5 On August 19, 2022, I caused to be served the document entitled **PLAINTIFF** SECURITIES AND EXCHANGE COMMISSION'S NON-OPPOSITION TO THIRD INTERIM FEE APPLICATION OF HOLLAND & KNIGHT, LLP, AS COUNSEL TO RECEIVER, FOR ALLOWANCE OF COMPENSATION AND 6 REIMBURSEMENT OF EXPENSES (Dkt. No. 110) on all the parties to this 7 action addressed as stated on the attached service list: 8 **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily 9 familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on 10 the same day in the ordinary course of business. 11 ☐ PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was 12 deposited with the U.S. Postal Service at Los Angeles, California, with first class 13 postage thereon fully prepaid. **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility 14 regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los 15 Angeles, California, with Express Mail postage paid. **HAND DELIVERY:** I caused to be hand delivered each such envelope to the 16 office of the addressee as stated on the attached service list. 17 UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I 18 deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California. 19 **ELECTRONIC MAIL:** By transmitting the document by electronic mail to 20 the electronic mail address as stated on the attached service list. 21 **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with 22 the CM/ECF system. 23 **FAX:** By transmitting the document by facsimile transmission. The 24 transmission was reported as complete and without error. 25 I declare under penalty of perjury that the foregoing is true and correct. 26 Date: August 19, 2022 /s/ Douglas M. Miller 27 Douglas M. Miller 28

SEC v. Titanium Blockchain Infrastructure Services, Inc., et al. 1 United States District Court – Central District of California 2 Case No. 2:18-cv-04315-DSF-JPR 3 SERVICE LIST 4 Andrew B. Holmes, Esq. (served by CM/ECF only) Patrick V. Chesney, Esq. (served by CM/ECF only) HOLMES, TAYLOR, SCOTT & JONES LLP The Oviatt Building 617 S. Olive Street, Suite 1200 5 6 7 Los Angeles, CA 90014
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