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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

SECURITIES AND EXCHANGE )

COMMISSION, )

)

Plaintiff, )

)

v. ) Civil Action No. 1:23-01599

)

BINANCE HOLDINGS LIMITED, )

BAM TRADING SERVICES INC., ) BAM MANAGEMENT US HOLDINGS ) INC., AND CHANGPENG ZHAO, )

)

Defendants. )

**)**

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF

U.S. SECURITIES AND EXCHANGE COMMISSION’S EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

FREEZING ASSETS AND GRANTING OTHER RELIEF AND ORDER TO SHOW CAUSE WHY RELIEF SHOULD NOT CONTINUE