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THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COINLAB, INC., a Delaware Corporation,

Plaintiff,

v.

MT. GOX KK, a Japanese corporation and
TIBANNE KK, a Japanese corporation,

Defendants/Counterclaim-Plaintiffs,

v.

COINLAB, INC., a Delaware Corporation,

Counterclaim-Defendant.

Case No. 2:13-cv-00777-MJP

**SUGGESTION OF BANKRUPTCY
AND NOTICE OF STAY**

PLEASE TAKE NOTICE THAT, on June 19, 2014, the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”) entered an Order Recognizing Foreign Main Proceeding and Granting Related Relief (the “Recognition Order”), on the petition filed by Mr. Nobuaki Kobayashi, in his capacity as the bankruptcy trustee and foreign representative of defendant and counterclaimant MtGox Co., Ltd., a/k/a MtGox KK (the “Debtor”), recognizing the Debtor’s bankruptcy proceeding under Japanese law, currently pending before the Twentieth Civil Division of the Tokyo District Court in Japan, as a foreign main proceeding pursuant to Chapter 15 of Title 11 of the United States Code (the “Bankruptcy Code”), and granting certain related relief. The Debtor’s Chapter 15

1 bankruptcy case is pending before the Bankruptcy Court in the case captioned *In re MtGox*
2 *Co., Ltd. a/k/a MtGox KK*, Case No. 14-31229 (SGJ). A copy of the Recognition Order is
3 attached hereto as **Exhibit A**. The Recognition Order refers to the Joint Stipulation and
4 Order Between the Greene Plaintiffs and the Foreign Representative of MtGox Co., Ltd. and
5 the Joint Stipulation and Order Between the Foreign Representative of MtGox Co., Ltd. and
6 CoinLab, Inc., each of which is attached hereto as **Exhibits B** and **C**, respectively.

7 Pursuant to Section 1520(a)(1) of the Bankruptcy Code, upon entry of the Recognition
8 Order, the automatic stay of Section 362 of the Bankruptcy Code immediately became
9 applicable with respect to the Debtor and the property of the Debtor within the territorial
10 jurisdiction of the United States, and therefore, *inter alia*, the claims asserted against the
11 Debtor in this action have been stayed.

12 RESPECTFULLY SUBMITTED this 23rd day of July, 2014.

13 **FENWICK & WEST LLP**

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Co., Ltd., a/k/a MtGox KK, by and through Nobuaki
Kobayashi, in his capacity as the Bankruptcy Trustee
and Foreign Representative of MtGox Co., Ltd., a/k/a
MtGox KK*

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2014, I caused the foregoing document to be filed with the Court, and have caused a copy to be served on:

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