

Hon. Marsha J. Pechman

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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.

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

**NOTICE OF CHAPTER 15  
PROCEEDING AND CONSENT TO  
ENTRY OF STAY**

Plaintiff CoinLab, Inc. notifies the Court that defendant Tibanne, KK, through its Japanese Bankruptcy Trustee Mr. Taro Awataguchi, filed a petition for relief under Chapter 15 of the U.S. Bankruptcy Code with the Bankruptcy Court for the Southern District of New York on February 3, 2015. A copy of the Voluntary Petition is attached as Exhibit 1.

On February 4, 2015, Judge Gerber of the Bankruptcy Court for the Southern District of New York heard Tibanne’s emergency motion for provisional relief in the form of, among other things, a temporary restraining order enjoining CoinLab from continuing to prosecute this litigation. Plaintiff CoinLab was given notice of this hearing and participated through counsel. CoinLab indicated to Judge Gerber that it does not oppose the entry of a

1 stay in this litigation in conjunction with Tibanne’s Chapter 15 proceeding. Judge Gerber  
2 then granted Tibanne’s motion for provisional relief and issued the requested injunction.

3 As a result of these developments, CoinLab requests that this Court enter an order  
4 striking all pending deadlines and staying this litigation. CoinLab respectfully suggests that  
5 the Court order the parties to submit a joint status report on the progress of the Tibanne  
6 bankruptcy and Chapter 15 proceedings every 120 days in conjunction with the status  
7 reports the Court has already ordered with regard to the insolvency proceedings for  
8 Tibanne’s co-defendant, MtGox KK. See Order Granting Motion to Stay, April 30, 2014,  
9 Dkt # 62.

10 Respectfully submitted:

11 Dated: February 4, 2015

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications. I have also emailed a copy of this filing to Ms. Angela J. Somers, Reid Collins & Tsai LLP, counsel for Tibanne in the Chapter 15 proceeding in the Southern District of New York.

By: /s/Edgar G. Sargent