

The Parties submit this agreed motion to stay and suspend for a period of three months all fact and expert discovery deadlines discovery set forth in the Court's orders of September 6, 2019 and September 12, 2019, including the February 28, 2020 deadline for the close of fact discovery, the March 16, 2020 deadline for disclosure of expert witnesses, the April 30, 2020 deadline for submission of expert reports, the May 29, 2020 deadline for supplementing initial disclosures, and the June 15, 2020 deadline for rebuttal expert disclosures. The parties also seek a similar three month stay of the June 30, 2020 dispositive motion deadline set forth in Court's September 6, 2019 order.

The parties are close to resolving this case and have agreed on proposed settlement terms. However, the attorneys from the Division of Enforcement representing Plaintiff CFTC cannot bind the CFTC to a negotiated consent order resolving this case without first obtaining approval from the five CFTC Commissioners. Therefore, the parties need time to (1) prepare a mutually-acceptable proposed consent order containing findings of fact and conclusions of law that resolves the CFTC's claims against Defendants and (2) recommend this consent order to the

Commission for approval. The parties seek relief from the Court's discovery deadlines so as not to affect any party's discovery rights or change the status quo while the parties work to finalize this resolution.

The parties agree that suspending all deadlines for a period of three months will give them ample time to finalize this resolution and minimize the chance that they will have to return to the Court to extend the stay. Because resolving this case through a consent order will allow the parties to bring this case to a close without consuming additional judicial resources, the parties respectfully request that the Court grant this three month stay.

Dated: January 21, 2020

Respectfully submitted,

PLAINTIFF COMMODITY FUTURES
TRADING COMMISSION

DEFENDANTS JITESH THAKKAR and
EDGE FINANCIAL TECHNOLOGIES, INC.,

By: /s/Thomas L. Simek
Chief Trial Attorney

By: /s/Renato Mariotti
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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and thereby caused service of the foregoing document via electronic notice on all parties and counsel of record.

/s/ Thomas L. Simek

Attorney for the Plaintiff