

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
COMMODITY FUTURES TRADING :
COMMISSION, :
:
v. :
:
GEMINI TRUST COMPANY, LLC, :
:
Defendant. :
:
-----X

22 Civ. 04563 (AKH)

**NOTICE OF JOINT MOTION FOR
RELIEF FROM JUDGMENT
PURSUANT TO RULE 60(b)**

PLEASE TAKE NOTICE, that upon the accompanying Motion, Memorandum of Law in Support, the Declaration of Avi Perry, the exhibits attached thereto, and all prior pleadings and proceedings herein, Plaintiff Commodity Futures Trading Commission and Defendant Gemini Trust Company, LLC, through their undersigned counsel, will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be set by the Court, for an order pursuant to Federal Rule of Civil Procedure 60(b) vacating the Consent Order for Permanent Injunction, Civil Monetary Penalty, and Other Equitable Relief entered on January 6, 2025 (Dkt. 211), or the prospective provisions thereof, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

Dated: Washington, D.C.
May 27, 2026

By: /s/ Avi Perry
Avi Perry
555 13th St NW., Suite 600
Washington, D.C. 20004
Tel.: (202) 538-8330
Email: aviperry@quinnemanuel.com

*Attorney for Defendant
Gemini Trust Company, LLC*

**COMMODITY FUTURES TRADING
COMMISSION**

/s/ John Einstman
John Einstman (*pro hac vice* pending)
Senior Advisor, Division of Enforcement
Commodity Futures Trading Commission
1155 21st Street, NW
Washington, D.C. 20581
Tel: (202) 418-5337
Email: jeinstman@cftc.gov

*Attorney for Plaintiff Commodity Futures
Trading Commission*