

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ERIC YOUNG, ADAM KURTZ, and  
DAVID CRYSTAL on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW  
INC., TETHER HOLDINGS LIMITED,  
TETHER LIMITED, DIGFINEX INC.,  
TETHER OPERATIONS LIMITED,  
TETHER INTERNATIONAL LIMITED,  
AND JOHN DOES 1-50,

Defendants.

No. 20 Civ. 00169 (KPF)  
ECF Case

DAVID LEIBOWITZ, BENJAMIN  
LEIBOWITZ, JASON LEIBOWITZ,  
AARON LEIBOWITZ, and PINCHAS  
GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW  
INC., TETHER HOLDINGS LIMITED,  
TETHER OPERATIONS LIMITED,  
TETHER LIMITED, TETHER  
INTERNATIONAL LIMITED, DIGFINEX  
INC., PHILIP G. POTTER, GIANCARLO  
DEVASINI, LUDOVICUS JAN VAN DER  
VELDE, REGINALD FOWLER, CRYPTO  
CAPITAL CORP., and GLOBAL TRADE  
SOLUTIONS AG,

Defendants.

No. 19 Civ. 09236 (KPF)  
ECF Case

**NOTICE OF MOTION TO APPOINT  
KIRBY MCINERNEY LLP AND THE RADICE LAW FIRM  
AS INTERIM LEAD COUNSEL**

PLEASE TAKE NOTICE that Plaintiffs Eric Young, Adam Kurtz, and David Crystal, through their undersigned attorneys, pursuant to Federal Rule of Civil Procedure 23(g), will and do hereby move this Court before The Honorable Katherine Polk Failla, Courtroom 618, at the United States Courthouse for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, at a time and date to be set by the Court, for entry of an order appointing as Interim Class Counsel the firms of Kirby McInerney LLP and The Radice Law Firm, P.C. (collectively, “Movants”).

Please take further notice, that, in support of this motion, Movants rely on this Notice of Motion, the accompanying Memorandum of Law, and the Declaration of Karen M. Lerner with attached exhibits, and all other papers and proceedings had herein.

Dated: January 13, 2020

**KIRBY MCINERNEY LLP**

/s/ Karen M. Lerner

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and David Crystal*