

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

HISTORY ASSOCIATES INCORPORATED,

Plaintiff,

v.

U.S. SECURITIES AND EXCHANGE
COMMISSION,

Defendant.

Case No. 1:24-cv-1858-ACR

JOINT STATUS REPORT

Pursuant to this Court’s August 8, 2024 Minute Order, Plaintiff, History Associates Incorporated (“History Associates” or “HAI”), and Defendant, the U.S. Securities and Exchange Commission (“SEC”), by and through their respective undersigned counsel, hereby submit this joint status report. The parties previously submitted a joint status report on August 23, 2024. Dkt. 14.

As stated in the parties’ previous joint status report, in its Complaint, History Associates asserts claims in connection with three Freedom of Information Act (“FOIA”) requests it submitted to the SEC seeking documents related to the SEC’s investigations relating to Ethereum (“Ethereum Request”), Zachary Coburn (“Coburn Request”), and Enigma MPC (“Enigma MPC Request”). Dkt. 1. The SEC’s Office of FOIA Services (“FOIA Office”) had informed History Associates that records responsive to those requests are protected from disclosure under FOIA Exemption 7(A). The SEC has since informed History Associates that, in light of intervening developments, some or all of the withheld documents may no longer be exempt under Exemption 7(A) but may be exempt under other FOIA provisions.

On September 19, 2024, the SEC informed History Associates that, given the volume of records that are potentially responsive to the FOIA requests, the FOIA Office would reprocess them in the Complex track. The parties are currently discussing the likely timing of reprocessing the FOIA requests in the Complex track and the scope of the requests. The parties propose that they provide a further status update on or before October 7, 2024.

Date: September 23, 2024

/s/ Jonathan C. Bond

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Respectfully submitted,

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