

Mr. Bourne will address the Business Plan that BF Labs was required to submit under the Stipulated Interim Order. Mr. Bourne will also address the factual assertions made in the Certification and Declaration of Helen P. Wong in Support of Plaintiff's Ex Parte Motion to the Court. Mr. Bourne may also address the Temporary Receivership and the limited operations to date, the overall operations and financial status of BF Labs, strategic planning, BF Labs policies and procedures, finance and accounting issues, and customer relations issues. Mr. Bourne may also address the irreparable harm that has already occurred to BF Labs and the individual defendants, and the irreparable harm that will result if a preliminary injunction is issued or the Temporary Receivership is continued.

Defendants may later seek leave to modify the scope or topics of testimony based on the additional supplemental factual evidence submitted by the FTC.

Dated: November 11, 2014

Respectfully submitted,

/s/ James M. Humphrey

James M. Humphrey MO # 50200
Michael S. Foster MO # 61205
Miriam E. Bailey MO # 60366
Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112-1895
Telephone: (816) 753-1000
Facsimile: (816) 753-1536
jhumphrey@polsinelli.com
mfoster@polsinelli.com
mbailey@polsinelli.com

Braden M. Perry MO # 53865
Kennyhertz Perry, LLC
420 Nichols Road, Suite 207
Kansas City, MO 64112
Direct: 816-527-9445
Fax: 855-844-2914
braden@kennyhertzperry.com

Attorneys for Defendants BF Labs Inc.,
Sonny Vleisides, and Darla Drake

/s/ James D. Griffin

James D. Griffin MO # 33370
Lisa M. Bolliger MO # 65496
Scharnhorst Ast Kennard Griffin, PC
1100 Walnut, Suite 1950
Kansas City, Missouri 64106
Tel: (816) 268-9400
Fax: (816) 268-9409
jgriffin@sakg.com
lbolliger@sakg.com

Attorneys for Defendant Nasser Ghoseiri

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2014, a true and correct copy of the foregoing was served by the Court's ECF system on the following:

Helen Wong
Teresa N. Kosmidis
Leah Frazier
Gregory Ashe
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Mail Stop CC-10232
Washington DC 20580
202-326-3779 (Wong)
202-326-3216 (Kosmidis)
202-326-2187 (Frazier)
hwong@ftc.gov
tkosmidis@ftc.gov
lfrazier@ftc.gov
gashe@ftc.gov

Charles M. Thomas
Assistant United States Attorney
Charles Evans Whittaker
Courthouse
400 East Ninth Street, Room 5510
Kansas City, MO 64106
816-426-3130
charles.thomas@usdoj.gov

Attorneys for Plaintiff

Bryant T. Lamer
Kersten L. Holzhueter
Andrea M. Chase
Katie Jo Wheeler
Lucinda H. Luetkemeyer
Spencer Fane Britt & Browne LLP
1000 Walnut Street, Suite 1400
Kansas City MO 64106
816-474-8100
blamer@spencerfane.com
kholzheuter@spencerfane.com
achase@spencerfane.com
kwheeler@spencerfane.com
lluetkemeyer@spencerfane.com

Attorneys for Temporary Receiver
Eric L. Johnson

/s/ James M. Humphrey
Attorney for Defendants BF Labs Inc.,
Sonny Vleisides, and Darla Drake