EXHIBIT A

Stipulation

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In re: Case No. 24-bk-23041-JTM

POWER BLOCK COIN, LLC., Chapter 11

Debtor. Judge Joel T. Marker

STIPULATION

The Official Committee of Unsecured Creditors (the "Committee") of the debtor and debtor-in-possession, Power Block Coin, LLC (the "Debtor"), along with the Debtor (collectively, the "Parties"), hereby stipulate and agree as follows:

RECITALS

1. On June 20, 2024 (the "<u>Petition Date</u>"), the Debtor commenced this proceeding by filing for bankruptcy under Chapter 11 of the Bankruptcy Code. [Doc. No. 1].

- 2. On September 19, 2024, the Debtor filed its Chapter 11 Small Business Subchapter V Plan [Doc. No. 185], which it subsequently amended to a traditional Chapter 11 plan on December 16, 2024. [Doc. No. 242].
- 3. On January 30, 2025, the Committee filed its Combined Chapter 11 Plan and Disclosure Statement [Doc. No. 254], which it subsequently amended, and filed an amended version on March 7, 2025. [Doc. No. 273].
- 4. Since the beginning of May, the Committee and the Debtor, along with affiliates of the Debtor, have been engaged in negotiations to explore whether agreement can be reached on a consensual plan.

STIPULATION

- 5. The Parties agree to engage in mediation with a judicial mediator appointed by the Court. The Parties also agree that certain affiliates of the Debtor will be included in the mediation.
- 6. Given the likelihood that Judge Hunt may be appointed to take over this proceeding after the Court's retirement, the Parties agree that it would be best for another Utah bankruptcy judge, other than Judge Hunt, to serve as mediator. In the alternative, given the upcoming retirements of several Utah bankruptcy judges, the Parties are also amenable to the appointment of a bankruptcy judge from the District of Colorado serving as mediator.
- 7. The Parties agree to a hybrid mediation, with in-person attendance available at the Salt Lake City office of Greenberg Traurig, and Zoom attendance available for those not able to attend in person.
- 8. The Parties request that a judicial mediator be appointed to allow for the mediation to occur within the month of June.

DATED this 3rd day of June, 2025.

GREENBERG TRAURIG LLP

/s/ Annette W. Jarvis
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Michael F. Thomson
Carson Heninger
Abigail J. Stone

Counsel for the Official Committee of Unsecured Creditors

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/s/ Brian M. Rothschild (signed with permission)
Brian M. Rothschild

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