

GREENBERG TRAURIG, LLP

Annette W. Jarvis (Utah #1649)

Michael F. Thomson (Utah #9707)

Carson Heninger (Utah #17410)

Abigail J. Stone (Utah # 19083)

222 South Main Street, Suite 1730

Salt Lake City, UT 84101

Telephone: (801) 478-6900

Email: jarvisa@gtlaw.com

thomsonm@gtlaw.com

carson.heninger@gtlaw.com

abigail.stone@gtlaw.com

Counsel for the Official Committee of Unsecured Creditors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

POWER BLOCK COIN, LLC,

Debtor.

Case No. 24-bk-23041

Chapter 11

Judge Cathleen D. Parker

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' *EX PARTE*
MOTION UNDER FED. R. BANKR. P. 2004 AND LOCAL RULE 2004-1
(DEBTOR)**

The Official Committee of Unsecured Creditors (the “Committee”) for the bankruptcy estate of Power Block Coin, LLC (the “Debtor”) in the above-captioned bankruptcy case, by and through its counsel of record, hereby files this *ex parte* motion (the “Motion”) seeking an order authorizing the subpoena of and production of documents by the Debtor under Federal Rule of Bankruptcy Procedure 2004 and Local Rule 2004-1. In support hereof, the Committee states as follows:

1. On June 20, 2024, the Debtor filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code.
2. The Committee was appointed on October 24, 2024 [Dkt. [199](#)].

3. The Committee requires further information and documentation from the Debtor regarding the Debtor's acts, conduct, property, liabilities, and financial condition.

4. Pursuant to Bankruptcy Rule 2004 and Rule 2004-1 of the Local Rules, the Committee requests an Order authorizing the Committee to issue a subpoena to the Debtor to produce documents to Abigail Stone, GREENBERG TRAURIG, LLP, 222 South Main Street, Suite 1730, Salt Lake City, UT 84101 concerning the Debtor's acts, conduct, property, liabilities, and financial condition.

5. The undersigned counsel hereby represents that the deadlines to produce documents will provide the Debtor with not less than 14 days of written notice.

WHEREFORE, the Committee requests that the Court enter an Order authorizing the Committee to issue all necessary subpoenas. The Committee will serve the Debtor with the Court's Order, together with subpoenas incorporating the documents and information outlined above.

DATED this 26th day of September 2025.

GREENBERG TRAURIG, LLP

/s/ Abigail J. Stone

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

*Counsel for the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on this 26th day of September 2025, I electronically filed the foregoing **OFFICIAL COMMITTEE OF UNSECURED CREDITORS' EX PARTE MOTION UNDER FED. R. BANKR. P. 2004 AND LOCAL RULE 2004-1 (DEBTOR)** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

- James W. Anderson jwa@clydesnow.com, gmortensen@clydesnow.com
- Laura Elizabeth Baccash laura.baccash@whitecase.com, mco@whitecase.com
- Mark D. Bloom mark.bloom@bakermckenzie.com
- Simeon J Brown sbrown@parsonsbehle.com
- Matthew James Burne matthew.burne@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Rinehart.Peshell@usdoj.gov; Rachell e.D.Hughes@usdoj.gov; Brittany.Dewitt@usdoj.gov
- Deborah Rae Chandler dchandler@aklawfirm.com
- Carson Heninger heninger@gtlaw.com, carson-heninger-5642@ecf.pacerpro.com, Candy.Long@gtlaw.com
- Samuel P. Hershey sam.hershey@whitecase.com, mco@whitecase.com
- Annette W. Jarvis jarvisa@gtlaw.com, longca@gtlaw.com
- Michael R. Johnson mjohnson@rqn.com, docket@rqn.com; ASanchez@rqn.com; RQN@ecfalerts.com
- Peter J. Kuhn Peter.J.Kuhn@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Rinehart.Peshell@usdoj.gov; Rachell e.D.Hughes@usdoj.gov; Brittany.Dewitt@usdoj.gov
- Joli A. Lofstedt joli@jaltrustee.com, ecf.alert+LofstedtUTB@titlexi.com, brenda@jaltrustee.com
- Artur Machalski artur.machalski@gmail.com
- Elliott D. McGill emcgill@parsonsbehle.com
- Darren B. Neilson dneilson@parsonsbehle.com
- Christopher L. Perkins cperkins@eckertseamans.com
- Gregory F. Pesce gregory.pesce@whitecase.com, mco@whitecase.com
- Walter A Romney war@clydesnow.com, gmortensen@clydesnow.com
- Brian M. Rothschild brothschild@parsonsbehle.com, ecf@parsonsbehle.com; docket@parsonsbehle.com
- Jeffrey Weston Shields jshields@rqn.com, 5962725420@filings.docketbird.com; docket@rqn.com; ecasaday@rqn.com
- Abigail Jennifer Stone abigail.stone@gtlaw.com
- Landon S. Troester lst@clydesnow.com, rcondos@clydesnow.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- Melinda Willden tr melinda.willden@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Rinehart.Peshell@usdoj.gov; Rachell e.D.Hughes@usdoj.gov; Brittany.Dewitt@usdoj.gov

/s/ Abigail Stone

By U.S. Mail – In addition to the parties of record receiving notice through the CM/ECF system, the following parties will be served notice pursuant to Fed R. Civ. P. 5(b):

Nikita Ash
1221 Avenue of the Americas
New York, NY 10020-1095

CFO Solutions, LLC dba Amplo
13601 W McMillan Rd
#102 PMB 320
Boise, ID 83713

Alexander S Chang
201 S. Main St Ste 1800
Salt Lake City, UT 84111

Kyle Ferrier
300 South Biscayne Blvd.
Suite 4900
Miami, FL 33131

Nicholas Kennedy
1900 N. Pearl Street
Suite 1500
Dallas, TX 75201

Colonel Michael D. Brewer
8901 Beauchamp Dr
Alexandria, VA 2230

/s / Abigail Stone