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*Counsel for the Official Committee of Unsecured Creditors*

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

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In re:

POWER BLOCK COIN, LLC,  
  
Debtor.

Case No. 24-bk-23041

Chapter 11

Judge Cathleen D. Parker

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**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' *EX PARTE*  
MOTION UNDER FED. R. BANKR. P. 2004 AND LOCAL RULE 2004-1  
(B2C2 USA, INC.)**

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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 B2C2 USA, Inc. (“B2C2”) 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. Based on information obtained by the Committee, B2C2 may have information regarding the Debtor's acts, conduct, property, liabilities, and financial condition that are relevant to this bankruptcy proceeding and the administration of the Debtor's estate.

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 B2C2 to produce documents to Abigail Stone, GREENBERG TRAURIG, LLP, 222 South Main Street, Suite 1730, Salt Lake City, UT 84101, including documents concerning the Debtor's cryptocurrency transactions and any other relevant information B2C2 possesses 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 B2C2 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 B2C2 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 (B2C2 USA, INC.)** 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.

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*/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):

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/s / Abigail Stone