

FILED

**IN THE DISTRICT COURT FOR THE FIRST JUDICIAL DISTRICT STATE OF
WYOMING, COUNTY OF LARAMIE**

CHUCK GRAY, Wyoming Secretary of
State,

Petitioner,

v.

AMERICAN CRYPTO FED DAO, LLC,

Respondent.

Civil Action No: 2024-CV-0202917

JOINT CASE MANAGEMENT REPORT

The parties, through their respective counsel, submit the following joint case management report pursuant to this Court’s order.

1. Joinder and Amendment of Pleadings: The parties do not anticipate additional parties or pleading amendments. They therefore propose August 1, 2025, as the deadline for amending the pleadings.
2. Discovery Plan:

- a. The parties anticipate that some discovery is necessary, primarily related to CryptoFed's affirmative defenses.
- b. The parties have agreed to exchange initial disclosures by July 11, 2025. They propose that August 8, 2025, be the last day to serve discovery on the other party.

3. Experts:

- a. At this time, the Secretary does not anticipate designating an expert witness except to rebut expert opinions offered by CryptoFed. CryptoFed may designate an expert witness.
- b. The parties propose an expert designation deadline of September 8, 2025, and a rebuttal expert designation deadline of October 10, 2025.

4. Alternative Dispute Resolution:

- a. The parties agree that this case is not a likely candidate for alternative dispute resolution. Discussions continue between them concerning whether non-judicial resolution is possible.

5. Dispositive Motions:

- a. Both parties anticipate filing motions for summary judgment.
- b. The parties propose a dispositive motion deadline of October 31, 2025, with responses and replies due according to Rule 6. Either or both parties may file motions earlier than that deadline.
- c. The parties may stipulate to undisputed facts before filing summary judgment motions.

- d. The parties agree that setting dispositive motion hearing may not be required or desirable considering that dispositive motions may be filed at any time. They propose that a party wishing a hearing make the appropriate motion contemporaneously with filing its dispositive motion.

6. Pretrial:

- a. The parties suggest that the joint pretrial memorandum be filed two weeks before the trial date. Any pretrial motions should be filed at least three weeks before trial and responses filed one week later.
- b. The parties agree that a pretrial hearing should be set for one week before the trial. Its length will depend on whether the Court intends to resolve pending pretrial motions at that time. If the Court addresses pretrial motions separately, the parties suggest the pretrial hearing be set for one hour.

7. Trial:

- a. The parties agree to a general window for setting trial of February 2026, but can be flexible depending on the Court's calendar.
- b. The parties anticipate that if a trial occurs, it will take approximately four days.

8. Court Reporter:

- a. The parties intend to request a court reporter for all hearings in this matter.

9. Other Matters:

- a. The parties do not contemplate other matters at this time.

Dated this 23rd day of June, 2025.

/s/ Mackenzie Williams

Mackenzie Williams, Bar No. 6-4250
Senior Assistant Attorney General
109 State Capitol
Cheyenne, WY 82002
307-777-8781
mackenzie.williams@wyo.gov

/s/ L. Cooper Overstreet

L. Cooper Overstreet, Bar No. 7-4996
Overstreet Homar & Kuker
2922 Central Ave.
Cheyenne, WY 82001
307-274-4444
cooper@kukerlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of June, 2025, the foregoing
was served on the following using the indicated methods:

FileAndServeXpress:

L. Cooper Overstreet
Overstreet Homar & Kuker
2922 Central Ave.
Cheyenne, WY 82001
cooper@kukerlaw.com

Courtesy Copy for Chambers
Hon. Benjamin M. Burningham

/s/ Mackenzie Williams
Office of the Attorney General