

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
ONE MANHATTAN WEST
NEW YORK, NY 10001

TEL: (212) 735-3000
FAX: (212) 735-2000
www.skadden.com

DIRECT DIAL
(212) 735-2628
DIRECT FAX
(917)-777-2628
EMAIL ADDRESS
JAY.KASNER@SKADDEN.COM

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November 1, 2021

BY ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 2201
New York, New York 10007

RE: Underwood, et al. v. Coinbase Global, Inc.,
21-cv-08353-PAE

Dear Judge Engelmayer:

We represent Defendant Coinbase Global, Inc. (“Defendant”) in the above putative class action. We write pursuant to Your Honor’s Individual Rule 1(E) to request an extension of Defendant’s time to answer, move, or otherwise respond to the complaint filed October 8, 2021 (the “Complaint”). Consistent with the Affidavit of Service filed October 15, 2021, Defendant’s current deadline to answer, move, or otherwise respond to the Complaint is November 3, 2021.

Because Plaintiffs assert claims pursuant to the Securities Exchange Act of 1934, this action is subject to the Private Securities Litigation Reform Act of 1995, which, among other things, provides for the appointment of a lead plaintiff and lead counsel to act on behalf of the putative class at the outset of this case. *See* 15 U.S.C. § 78u-4(a)(3). We have conferred with Plaintiffs’ counsel, who agrees it would be more efficient to extend the time for Defendant to answer, move, or otherwise respond to the Complaint until a lead plaintiff is appointed and any amended complaint has been filed.

Accordingly, the parties respectfully request that, (A) Defendant’s time to move, answer, or otherwise respond to the Complaint be adjourned *sine die*; (B) once an order is entered appointing lead plaintiff and lead counsel, such lead plaintiff will have 45 days from the date thereof to file an amended complaint; and

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(C) Defendant's time to answer, move, or otherwise respond to the amended complaint be extended to and including 45 days from the date of filing of the amended complaint.

There have been no previous requests for an extension of time. Counsel for Plaintiffs has consented to this request.

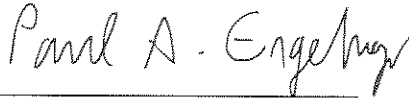
Respectfully submitted,

/s/ Jay B. Kasner

Jay B. Kasner

cc: Ian W. Sloss, Silver Golub & Teitell LLP
Steven L. Bloch, Silver Golub & Teitell LLP
(via ECF)

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
November 2, 2021