

EXHIBIT A

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November 13, 2022

Via Courier and E-Mail

The Securities Commission of The Bahamas
Poinciana House
North Building, 2nd Floor 31A
East Bay Street
P.O. Box N-8347
Nassau, The Bahamas
info@scb.gov.bs

Mr. Brian Simms, K.C.
Provisional Liquidator of FTX Digital Markets Ltd.
3 Bayside Executive Park
West Bay Street & Blake Road
PO Box N-4875
Nassau, The Bahamas
bsimms@lennoxpaton.com

Re: Automatic Stay of Actions and Proceedings against FTX Trading Ltd. and its Affiliated Debtors as a Result of the Commencement of U.S. Chapter 11 Proceedings

Ladies and Gentlemen:

We write on behalf of FTX Trading Ltd. and its affiliates listed in the exhibit hereto (collectively, “FTX Debtor Entities”) in our capacity as their proposed U.S. legal counsel. As we believe you are aware, on November 11, 2022, the FTX Debtor Entities filed voluntary petitions for relief under Chapter 11, Title 11 of the United States Code (the “Bankruptcy Code”), commencing proceedings before the United States Bankruptcy Court for the District of Delaware (such Court, the “Bankruptcy Court” and such proceedings, collectively, the “Chapter 11 Proceedings”).¹

¹ See *FTX Trading Ltd.*, Case No. 22-11068 (JTD) (Bankr. D. Del.), D.I. 1. It is expected that the Chapter 11 Proceedings will be jointly administrated for procedural purposes only. As a result, all

As a result of the commencement of the Chapter 11 Proceedings, the FTX Debtor Entities are protected by the automatic stay of Section 362 of the Bankruptcy Code. 11 U.S.C. § 362. The automatic stay enjoins all persons, including without limit, all U.S. and non-U.S. governmental units, from, among other things: (1) commencing or continuing any judicial, administrative, or other action or proceeding against any FTX Debtor Entity that was or could have been initiated before the commencement of the Chapter 11 Proceedings; (2) enforcing, against any FTX Debtor Entity, a judgment obtained before the commencement of the Chapter 11 Proceedings; (3) taking any action to obtain possession of, or exercise control over, property of any FTX Debtor Entity, where property is expansively defined under Section 541 of the Bankruptcy Code to include, among other things, tangible and intangible assets (11 U.S.C. § 541); (4) taking any action to create, perfect, or enforce against property of any FTX Debtor Entities any lien to the extent that such lien secures a claim that arose before the commencement of the Chapter 11 Proceedings; and (5) taking any action to collect, assess, or recover a claim against any FTX Debtor Entity that arose before the commencement of Chapter 11 Proceedings.

Please be advised that the protections under the automatic stay apply extraterritorially (*i.e.*, outside the United States), extending to property of the FTX Debtor Entities wherever they are located and by whomever held. *See, e.g., Hong Kong & Shanghai Banking Corp., Ltd. v. Simon (In re Simon)*, 153 F.3d 991, 996 (9th Cir. 1998) (“Congress intended extraterritorial application of the Bankruptcy Code as it applies to property of the estate”); *SIPC v. Bernard L. Madoff Inv. Sec. LLC (In re Bernard L. Madoff Inv. Secs. LLC)*, 474 B.R. 76, 84 (S.D.N.Y. 2012) (upholding extraterritorial enforcement of the automatic stay and injunction barring foreign creditor’s lawsuit); *Nakash v. Zur (In re Nakash)*, 190 B.R. 763, 768 (Bankr. S.D.N.Y. 1996) (“[B]ased upon the applicable Code sections [and] other indicia of congressional intent, . . . the automatic stay applies extraterritorially”). As such, these protections extend to any property of the FTX Debtor Entities located in the Bahamas.

Violations of the automatic stay can result in damages, sanctions and penalties, which will be sought as and when necessary. If you have any questions, including with respect to the legal positions that the FTX Debtor Entities might assert in the Chapter 11 Proceedings with respect to the automatic stay protection, you may direct them to the undersigned by email at bromleyj@sullcrom.com or gluecksteinb@sullcrom.com.

Sincerely,

/s/ James L. Bromley
James L. Bromley

/s/ Brian D. Glueckstein
Brian D. Glueckstein

cc: John J. Ray III
(FTX Trading Ltd.)

pleadings and papers will be filed in the docket of the above-captioned case and such docket should be consulted for all matters affecting the Chapter 11 Proceedings.

Exhibit**List of Debtors-in-Possession in U.S. Chapter 11 Proceedings**

- | | | |
|--|---|--|
| 1. Alameda Aus Pty Ltd | 37. FTX Digital Holdings (Singapore) Pte Ltd | 74. LedgerPrime Bitcoin Yield Enhancement Fund, LLC |
| 2. Alameda Global Services Ltd. | 38. FTX EMEA Ltd. | 75. LedgerPrime Bitcoin Yield Enhancement Master Fund LP |
| 3. Alameda Research (Bahamas) Ltd | 39. FTX Equity Record Holdings Ltd | 76. LedgerPrime Digital Asset Opportunities Fund, LLC |
| 4. Alameda Research Holdings Inc. | 40. FTX EU Ltd. | 77. LedgerPrime Digital Asset Opportunities Master Fund LP |
| 5. Alameda Research KK | 41. FTX Europe AG | 78. LedgerPrime Ventures, LP |
| 6. Alameda Research LLC | 42. FTX Exchange FZE | 79. Liquid Financial USA Inc. |
| 7. Alameda Research Ltd | 43. FTX Hong Kong Ltd | 80. Liquid Securities Singapore Pte Ltd |
| 8. Alameda Research Pte Ltd | 44. FTX Japan Holdings K.K. | 81. LiquidEX LLC |
| 9. Alameda Research Yankari Ltd | 45. FTX Japan K.K. | 82. LT Baskets Ltd. |
| 10. Alameda TR Ltd | 46. FTX Japan Services KK | 83. Maclaurin Investments Ltd. |
| 11. Alameda TR Systems S. de R. L. | 47. FTX Lend Inc. | 84. Mangrove Cay Ltd |
| 12. Allston Way Ltd | 48. FTX Marketplace, Inc. | 85. North Dimension Inc |
| 13. Analisya Pte Ltd | 49. FTX Products (Singapore) Pte Ltd | 86. North Dimension Ltd |
| 14. Atlantis Technology Ltd. | 50. FTX Property Holdings Ltd | 87. North Wireless Dimension Inc |
| 15. Bancroft Way Ltd | 51. FTX Services Solutions Ltd. | 88. Paper Bird Inc |
| 16. Blockfolio, Inc. | 52. FTX Structured Products AG | 89. Pioneer Street Inc. |
| 17. Blue Ridge Ltd | 53. FTX Switzerland GmbH | 90. Quoine India Pte Ltd |
| 18. Cardinal Ventures Ltd | 54. FTX Trading GmbH | 91. Quoine Pte Ltd |
| 19. Cedar Bay Ltd | 55. FTX Trading Ltd. | 92. Quoine Vietnam Co. Ltd |
| 20. Cedar Grove Technology Services, Ltd | 56. FTX Turkey Teknoloji Ve Ticaret Anonim Şirket | 93. SNG Investments Yatirim Ve Danışmanlik Anonim Şirketi |
| 21. Clifton Bay Investments LLC | 57. FTX US Services, Inc. | 94. Strategy Ark Collective Ltd. |
| 22. Clifton Bay Investments Ltd | 58. FTX US Trading, Inc. | 95. Technology Services Bahamas Limited |
| 23. Cottonwood Grove Ltd | 59. FTX Ventures Ltd | 96. Verdant Canyon Capital LLC |
| 24. Cottonwood Technologies Ltd. | 60. FTX Zuma Ltd | 97. West Innovative Barista Ltd. |
| 25. Crypto Bahamas LLC | 61. GG Trading Terminal Ltd | 98. West Realm Shires Financial Services Inc. |
| 26. DAAG Trading, DMCC | 62. Global Compass Dynamics Ltd. | 99. West Realm Shires Services Inc. |
| 27. Deck Technologies Holdings LLC | 63. Good Luck Games, LLC | 100. Western Concord Enterprises Ltd. |
| 28. Deck Technologies Inc. | 64. Goodman Investments Ltd. | 101. Zubr Exchange Ltd |
| 29. Deep Creek Ltd | 65. Hannam Group Inc | |
| 30. Digital Custody Inc. | 66. Hawaii Digital Assets Inc. | |
| 31. Euclid Way Ltd | 67. Hilltop Technology Services LLC | |
| 32. FTX (Gibraltar) Ltd | 68. Hive Empire Trading Pty Ltd | |
| 33. FTX Canada Inc | 69. Innovatia Ltd | |
| 34. FTX Certificates GmbH | 70. Island Bay Ventures Inc | |
| 35. FTX Crypto Services Ltd. | 71. Killarney Lake Investments Ltd | |
| 36. FTX Digital Assets LLC | 72. Ledger Holdings Inc. | |
| | 73. Ledger Prime LLC | |