

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**-- against --**

**TRENDON T. SHAVERS AND BITCOIN  
SAVINGS AND TRUST,**

**Defendants.**

**CIVIL ACTION NO.:**

**4:13-CV-416**

**EMERGENCY MOTION BY PLAINTIFF FOR LEAVE TO  
EXCEED PAGE LIMITATION UNDER LOCAL CIVIL RULE CV-7**

Contemporaneous with the filing of the Complaint in this case, Plaintiff Securities and Exchange Commission (“Commission”) intends to file an Emergency Motion for an Order to Show Cause, Asset Freeze, and Other Ancillary Relief (“Motion and Brief”) and Brief in Support Thereof. The Commission respectfully requests permission to exceed, by one page, the 15-page limitation imposed by Local Civil Rule CV-7(a)(2). In support of this motion, the Commission states the following:

1. The Commission is filing its Motion and Brief to request emergency relief in the form of an asset freeze on the assets of the Defendants and other equitable and ancillary relief, all designed to preserve the status quo prior to a full hearing on the merits in this matter. The basis for the Commission’s motion is that the Defendants are engaged in a securities fraud scheme in which they are making misrepresentations to the public and to investors, that they are obtaining investor funds as a result of the misrepresentations, and that they are not using investors funds in the manner in which they have represented. In fact, the Commission has set forth significant

evidence that the Defendants are misappropriating the investor funds to, among other things, pay personal and unrelated expenses.

2. In support of its motion for the asset freeze and other emergency relief, and in connection with the filing of the Complaint in this action, the Commission is filing a brief and an appendix containing various declarations and attachments.

3. Despite best efforts, and because the Commission is trying to aid the Court as best it can, the Commission's factual background and legal discussion in the Motion and Brief exceeds, by a single page, the 15-page limit under Local Civil Rule CV-7(a)(2) for non-dispositive motions. The necessity to exceed the page limitation is primarily due to the need to discuss the nature of the fraudulent activities at issue and to demonstrate the emergency need for emergency relief.

**WHEREFORE**, the Commission respectfully requests that it be permitted to file the Emergency Motion for an Order to Show Cause, Asset Freeze, and Other Ancillary Relief and Brief in Support Thereof, and that the Court permit the Commission to exceed the 15-page limit, and grant the Commission such other and further support to which it may be entitled.

Dated: July 23, 2013

By: */s/ Jessica B. Magee*  
JESSICA B. MAGEE  
Lead Attorney  
Texas Bar No. 24037757  
Matthew J. Gulde  
Illinois Bar No. 6272325  
SECURITIES AND EXCHANGE COMMISSION  
Burnett Plaza, Suite 1900  
801 Cherry Street, Unit 18  
Fort Worth, TX 76102  
(817) 978-6465  
(817) 978-4927 (fax)  
[MageeJ@sec.gov](mailto:MageeJ@sec.gov)

ATTORNEYS FOR PLAINTIFF  
SECURITIES AND EXCHANGE COMMISSION

Of Counsel:

Andrew M. Calamari\* (CalamariA@sec.gov)  
Valerie A. Szczepanik\* (SzczepanikV@sec.gov)  
Philip Moustakis\* (MoustakisP@sec.gov)  
SECURITIES AND EXCHANGE COMMISSION  
NEW YORK REGIONAL OFFICE  
3 World Financial Center  
New York, NY 10281-1022  
Ph: (212) 336-0542

*\*not admitted in the E.D. Tex.*