

**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 (RC) (ALM)**

PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff Securities and Exchange Commission ("Commission") respectfully requests the Clerk of the Court enter defaults against Defendants Trendon T. Shavers ("Shavers") and Bitcoin Savings and Trust.

On July 23, 2013, the Commission caused Shavers to be served personally with the Summons and Complaint in this action [Dkt. #17] and Shavers signed an Acknowledgment of Service acknowledging the same [Dkt. #17-1]. On the same day, the Commission caused BTCST to be served with the Summons and Complaint in this action [Dkt. #16] through Shavers, as an individual designated to accept service of process on behalf of BTCST, and Shavers signed an Acknowledgment of Service acknowledging the same [Dkt. #16-1].

To date, Shavers and BTCST each have failed to serve an answer or other responsive pleading and the time to answer has expired.

WHEREFORE, the Commission respectfully requests the Clerk of the Court enter a default against each Shavers and BTCST.

Dated: August 22, 2013
New York, NY

By: /s/ Philip Moustakis
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**not admitted in the E.D. Tex.*

CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of August, 2013, I, Philip Moustakis, served (a) Plaintiff's Request for Clerk's Entry of Default, (b) Affidavit in Support of Clerk's Entry of Default (as to Defendant Shavers), (c) Affidavit in Support of Clerk's Entry of Default (as to Defendant Bitcoin Savings and Trust), and (d) [Proposed] Clerk's Entry of Default, by electronic mail pursuant to agreement among the parties concerning service in this action as follows:

TRENDON T. SHAVERS
trendon@buscog.com

BITCOIN SAVINGS AND TRUST
c/o Trendon T. Shavers
trendon@buscog.com

/s/ Philip Moustakis
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Admitted Pro Hac Vice