

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SECURITIES AND EXCHANGE
COMMISSION

v.

TRENDON T. SHAVERS AND
BITCOIN SAVINGS AND TRUST

CIVIL ACTION NO. 4:13cv416
(Judge Clark/Judge Mazzant)

DECLARATION OF FRANKLIN JASON SEIBERT IN SUPPORT OF
DEFENDANTS' RESPONSE TO ORDER TO SHOW CAUSE WHY RULE 37
SANCTIONS SHOULD NOT BE IMPOSED

1. I, Franklin Jason Seibert, am the attorney of record for defendants in this case.
2. On Friday, June 6, 2014, at approximately 11:45am, I received a phone call from Ms. Jessica McGee of the Securities and Exchange Commission. She inquired how I was, and I informed her that I was tired. She then informed me that she was calling to confer on a motion she was going to file the afternoon of June 6, 2014 (same day). She did not provide me with a copy of the motion, or inform me of its contents or its merits. She simply asked if I was opposed to a motion to strike the subject matter jurisdiction motion I had filed based on defendants still being in default? I responded, "I'm opposed." She quickly ended the call. The phone call lasted approximately less than one minute. Ms. McGee did not request an extension of time. Such a request would have been stipulated upon a reasonable schedule.

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3. Attached as Exhibit 1 (EXH 1) is a true and correct copy of an email correspondence between myself and Mr. Moustakis of the Securities and Exchange Commission where I informed Mr. Moustakis that extensions of time would be freely given on filings.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 8, 2014.

/s/ Franklin Jason Seibert
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