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10 Attorneys for Creditor
11 LIQUIDBITS CORP.

12 UNITED STATES BANKRUPTCY COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 In re:

16 Case No. 14-30725 DM

17 Chapter 7

18 HASHFAST TECHNOLOGIES, LLC,

19 Debtor.

20 **EMERGENCY MOTION OF LIQUIDBITS CORP. FOR ENTRY OF AN ORDER**
21 **APPOINTING A CHAPTER 7 TRUSTEE PURSUANT TO SECTION 303(G) OF THE**
22 **BANKRUPTCY CODE, OR FOR ALTERNATIVE RELIEF**

23 Creditor Liquidbits Corp. ("Liquidbits"), through its undersigned attorneys, hereby moves
24 for entry of an Order directing the United States trustee to appoint an interim Chapter 7 trustee
25 pursuant to section 303(g) of the Bankruptcy Code, or for alternative relief pursuant to section
26 303(f) of the Bankruptcy Code. In support of this motion, Liquidbits submits the accompanying
27 (a) *Memorandum of Points and Authorities in Support Emergency Motion of Liquidbits Corp. for*
28 *Entry of an Order Appointing a Chapter 7 Trustee Pursuant to Section 303(g) of the Bankruptcy*
Code, or for Alternative Relief (the "Memorandum"), (b) *Declaration of Gregory Bachrach in*

1 *Support of Emergency Motion of Liquidbits Corp. for Entry of an Order Appointing a Chapter 7*
2 *Trustee Pursuant to Section 303(g) of the Bankruptcy Code, or for Alternative Relief, (c)*
3 *Declaration of Willem van Rooyen in Support of Emergency Motion of Liquidbits Corp. for Entry*
4 *of an Order Appointing a Chapter 7 Trustee Pursuant to Section 303(g) of the Bankruptcy Code,*
5 *or for Alternative Relief and (d) Declaration of Kristen A. Palumbo in Support of Emergency*
6 *Motion of Liquidbits Corp. for Entry of an Order Appointing a Chapter 7 Trustee Pursuant to*
7 *Section 303(g) of the Bankruptcy Code, or for Alternative Relief. By this motion:*

8 1. Liquidbits requests that the Court enter an Order directing the United States
9 Trustee to appoint an interim Chapter 7 trustee. For the reasons set forth in the Memorandum, the
10 urgent appointment of an interim Chapter 7 trustee to take all appropriate steps to realize the
11 value of Hashfast's inventory -- the sole source of recovery for Hashfast's creditors -- is critical to
12 ensure that Hashfast's estate is not dissipated before an order for relief can be entered. In the
13 alternative, for the reasons set forth in the Memorandum, pending the Court's consideration of the
14 appointment of an interim Chapter 7 trustee or until an interim Chapter 7 trustee is appointed,
15 Liquidbits requests that the Court confirm that an order issued on May 8, 2014 in an arbitration
16 initiated by Liquidbits against alleged debtor Hashfast Technologies LLC ("Hashfast") is still
17 binding on Hashfast, or that the Court issue a like order, as permitted by Section 303(f) of the
18 Bankruptcy Code, enjoining Hashfast from continuing to sell or otherwise dispose of the Golden
19 Nonce Chips ("Chips") in its inventory or the wafers from which the Chips are cut.

20 2. Liquidbits also requests that the Court direct Hashfast to provide an accounting of
21 all of its receipts and disbursements since the Petition Date to determine whether all proceeds and
22 other assets have been used to support its business and were not diverted to third parties.

23 3. Liquidbits further requests that the Court grant any such other and further relief as
24 is just and proper.

1 DATED: May 21, 2014

Respectfully submitted,

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BINGHAM McCUTCHEN LLP

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By: /s/ Kristen A. Palumbo

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David M. Balabanian

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