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Counsel to Brendan White

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
CELSIUS NETWORK LLC, <i>et al.</i> ,)	Case No. 22-10964 (MG)
Debtors.)	(Jointly Administered)

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that on August 2, 2022, Brendan White served a written Demand for Reclamation of Goods pursuant to 11 U.S.C. § 546(c) upon Debtors herein, by email communications to its counsel of record. Attached hereto as **Exhibit A** is a copy of the written demand.

New York, New York
Dated: August 2, 2022



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EXHIBIT A

[Reclamation Demand Letter]



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August 2, 2022

Via Email:

Joshua A. Sussberg, P.C.
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ross.kwasteniet@kirkland.com

Re: In re: CELSIUS NETWORK LLC, et al., Debtors, Chapter 11 Case No. 22-10964 (MG) (jointly administered) (collectively, the “Debtors”) in the U.S. Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”); Reclamation and Demand by Brendan White

Dear Counsel:

This firm represents Brendan White (“White”) a buyer and seller of cryptocurrencies.

White hereby asserts his written demand of reclamation (the “Reclamation Demand”) pursuant to Section 2-702 of the Uniform Commercial Code and Section 546(c) of the Bankruptcy Code for all Tether USD (USDT) (the “Goods”) delivered by White and received by the Debtors, specifically the Goods identified in Exhibit A attached hereto, during the applicable periods referred to in the above-cited sections. The Goods include, without limitation, those Goods that were provided to Debtors pursuant to and itemized in the records Attached in Exhibit A.

Joshua A. Sussberg, P.C.
Patrick J. Nash, Jr., P.C.
Ross M. Kwasteniet, P.C.
August 2, 2022
Page two

As the Exhibit details, the Goods subject to this Reclamation Demand are valued at \$249,150.54 as of the petition date and summarized as follows:

Date Delivered to Debtors	Amount of Tether USD (USDT)
May 30, 2022	5
May 30, 2022	25,260.96
May 31, 2022	12,607.44
June 2, 2022	217,777.75
June 7, 2022	(15,000) returned
June 7, 2022	8,499.39
Total	<u>249,150.54</u>

By this letter, the Debtors are instructed to immediately inventory the Goods, keep the Goods segregated from all other property of the Debtors, and provide White a written account and summary disclosing the status of all Goods, to the extent such relief is consistent with the Bankruptcy Code and any order entered by the Bankruptcy Court.

White reserves the right to further amend or supplement this Reclamation Demand, including providing additional evidence in support or submitting additional notices of claims.

White reserves all other claims at law or in equity, including but not limited to its rights to an allowed administrative claim pursuant to section 503(b)(9) of the Bankruptcy Code for all Goods received by the Debtors within twenty days before the commencement of the Debtors' bankruptcy cases, its rights under sections 503(b)(1)(A), 362(b)(3), 546(b)(1)(B), and 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code, its contracts, applicable law, and any order of the Bankruptcy Court.

Please contact me if you have any questions or comments regarding the foregoing.

Sincerely,



Dov Kleiner

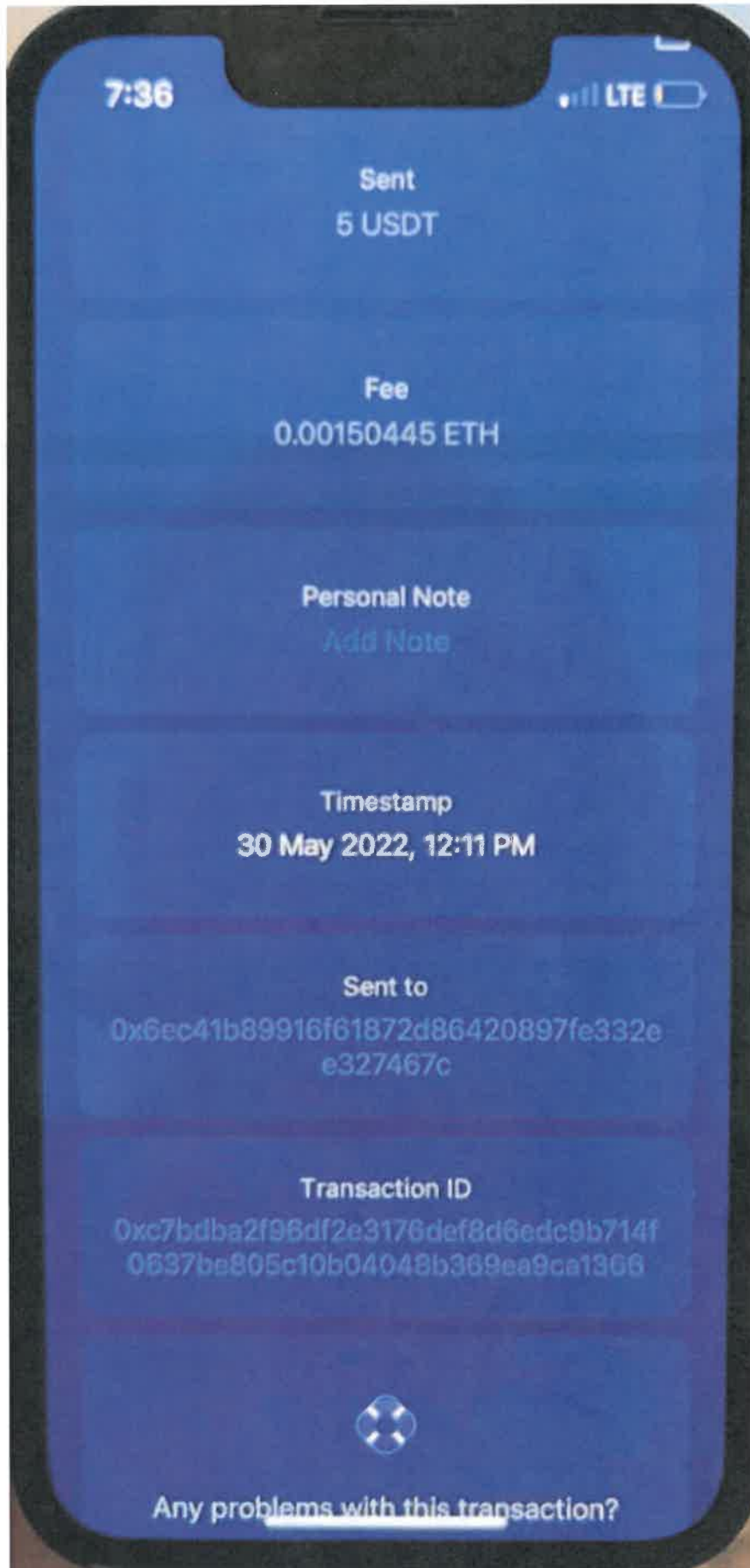
Enclosures

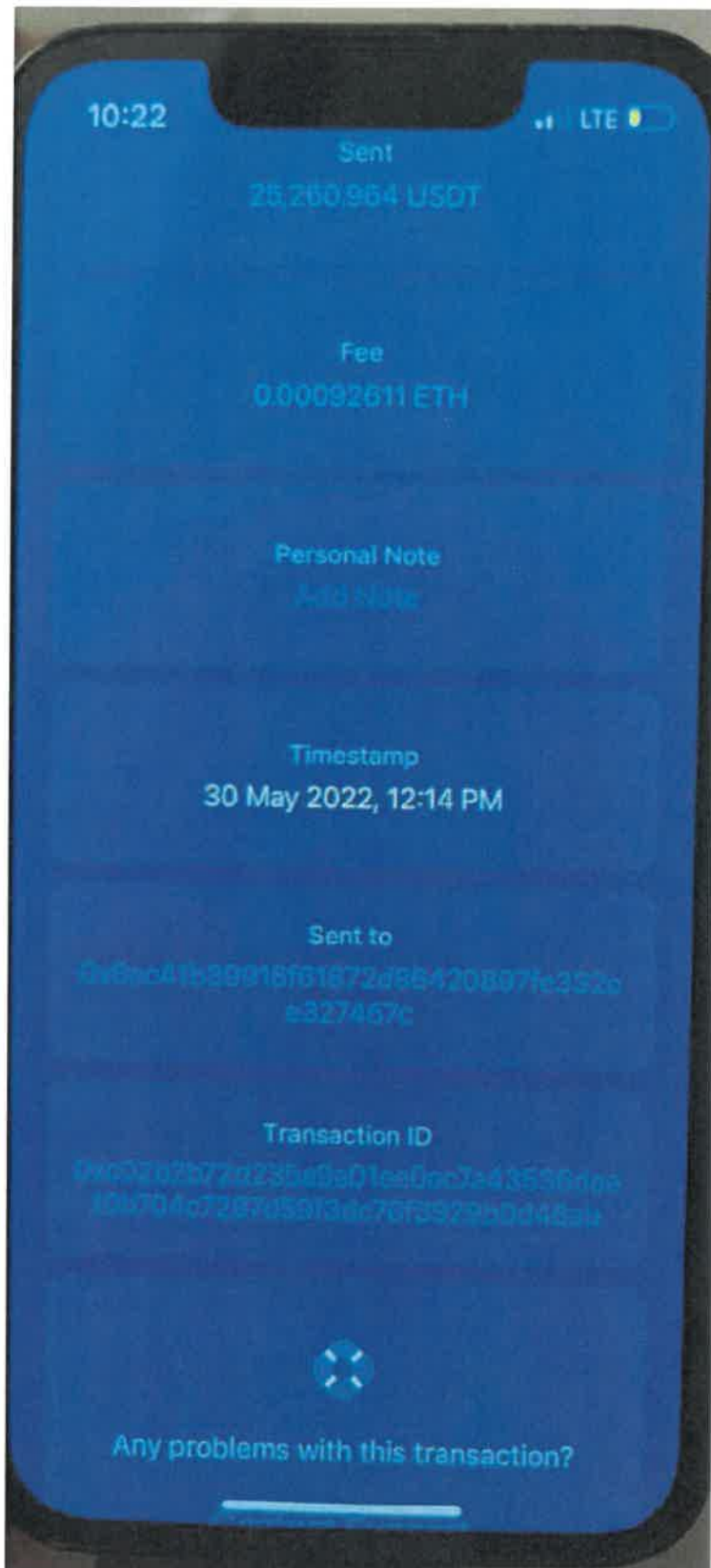


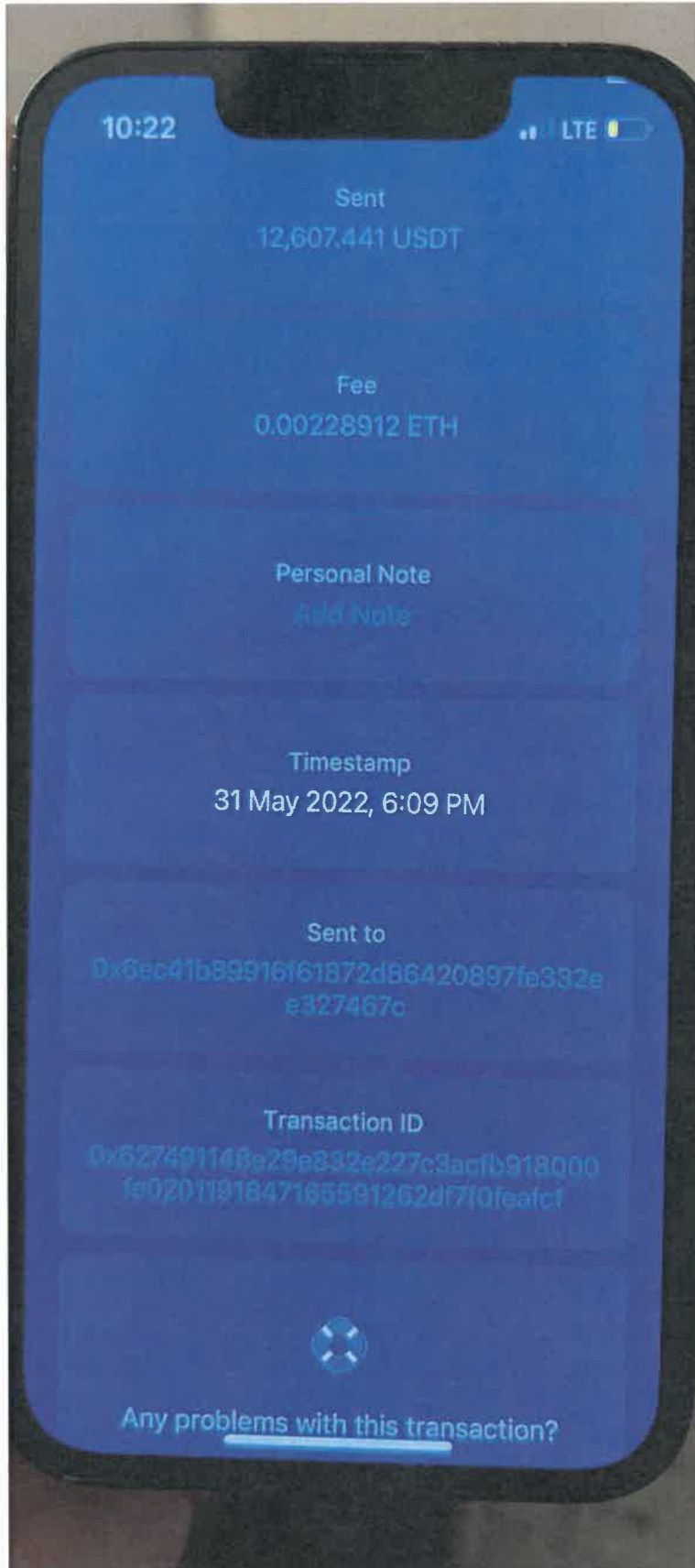
Exhibit A - Records

The screenshot shows a web browser window with the URL 'app.celsus.network/transactions'. The page title is 'Transactions'. A blue banner at the top states: 'Withdrawals, swaps and transfers between accounts are currently paused, while we take steps to preserve and protect assets. More information [here](#).' Below this is a navigation bar with 'Home', 'Assets', 'Transactions', 'Send', 'Receive', 'Buy', 'Sell', 'Deposit', and 'Withdraw'. The main content area displays a list of transactions under the heading 'Transactions'. On the right side, there is a profile card for 'Brendan Battaglia White' with a profile picture, a Celsus ID '01692226422', and a list of social media links (Discord, Twitter, Facebook, Instagram, YouTube, Twitch, Email, GitHub, and a link to 'View Profile').

Type	Status	Date & Time	From / To	Amount
Receive	Completed	Jun 7, 2022 10:55 PM	47% (ETH) (USD) (BTC)	+14,400.00
Receive	Completed	Jun 2, 2022 12:22 PM	237.7771564261 USD (BTC)	+521,777.70
Receive	Completed	Nov 30, 2022 1:04:10 PM	32,947,463,051 USD (BTC)	+812,607.44
Receive	Completed	May 30, 2022 12:18:48 PM	25,160,945,524 USD (BTC)	+225,260.76
Receive	Completed	May 30, 2022 12:12:04 PM	5 USD (BTC)	+15
Receive	Completed	May 25, 2022 10:44:36 AM	25 USD (BTC)	+123,700









6:03

LTE 

Personal Note

[Add Note](#)

Created

A few seconds ago...

Sent to

[0x6ec41b89916f61872d86420897fe332e
e327467c](#)

Transaction ID

[0x0a1ca9a97c5fbe2490c5bf70b0580ebb
72bb78aff5ee2e0e93cfd6c9cd953b8b](#)

Now

\$8,500.00



Any problems with this transaction?

[Contact Support](#)