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 Commission, and Aaron D. Ford*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBINHOOD DERIVATIVES, LLC,

 Plaintiffs,

vs.

MIKE DREITZER, in his official capacity as
 Chairman of the Nevada Gaming Control
 Board, et al.

Defendants.

Case No. 2:25-cv-01541-APG-DJA

JOINT NOTICE OF AGREEMENT CONCERNING ENFORCEMENT PENDING APPEAL

Mike Dreitzer, George Assad, Chandeni K. Sendall, Nevada Gaming Control Board, Jennifer
 Togliatti, Rosa Solis-Rainey, Brian Krolicki, George Markantonis, Nevada Gaming Commission, and
 Aaron D. Ford (collectively, “**Defendants**”), by and through their counsel of record, the State of
 Nevada, Office of Attorney General, and Andersen Beede Weisenmiller, on the one hand, and
 Robinhood Derivatives, LLC (“**Plaintiff**” and, with Defendants, the “**Parties**”), by and through its

1 counsel of record, Cravath, Swaine & Moore LLP and Pisanelli Bice PLLC, hereby submit this joint
2 notice of their agreement concerning certain potential enforcement actions by the State of Nevada with
3 respect to the listing, offering, sale, or permitting of trading of sports-related event contracts
4 (“**Enforcement Actions**”) during any appeal by Plaintiff of the Court’s *Order Denying Motion for*
5 *Temporary Restraining Order* (“**Order of Denial**”). (ECF No. 90).

6 As directed by the Court, the Parties engaged in substantive discussions concerning a potential
7 stay of Enforcement Actions by Defendants during the pendency of any appeal of the Order of Denial
8 taken by Plaintiff and have agreed as follows:

9 1. Plaintiff agrees to cease offering new sports-related event contracts in Nevada beginning
10 on December 1, 2025, and until the first to occur:

- 11 a. The United States District Court, District of Nevada (“**District Court**”), grants Plaintiff
12 an injunction pending appeal staying such Enforcement Actions (whereby “injunction
13 pending appeal” also includes a temporary injunction until the Ninth Circuit has the
14 opportunity to rule on an injunction pending appeal);
- 15 b. The United States Court of Appeals for the Ninth Circuit (“**Appeals Court**”) grants
16 Plaintiff an injunction pending appeal staying such Enforcement Actions; or
- 17 c. Final resolution of Plaintiff’s appeal of the Order of Denial, either by the Ninth Circuit
18 or, if certiorari is sought, by denial of certiorari or a decision by the Supreme Court of
19 the United States.

20 2. During the time that Plaintiff is not offering new sports-related event contracts in
21 Nevada, as discussed above, Plaintiff further agrees to take reasonable action to explore unwinding
22 longer-duration open sports-related event contracts in Nevada, and will cooperate with Defendants
23 regarding the same. In the event that the District Court and the Appeals Court deny an injunction
24 pending appeal, Plaintiff will work with Defendants to unwind all open sports-related event contracts
25 involving Nevada customers.

3. Should either the District Court or the Appeals Court grant Plaintiff an injunction pending appeal staying such Enforcement Actions, Plaintiff intends to resume offering sports-related event contracts in Nevada.

4. During the time that Plaintiff is not offering new sports-related event contracts in Nevada, as discussed above, or should either the District Court or the Appeals Court grant Plaintiff an injunction pending appeal staying such Enforcement Actions, and further provided that Plaintiff complies and continues to comply with the agreements contained herein, Defendants will forbear from bringing any Enforcement Actions against Plaintiff for sports-related event contracts offered prior to December 1, 2025, or during the pendency of any of the injunctions described in Paragraphs 1(a) through 1(c).

5. The agreements contained herein are without prejudice to any party's rights, obligations, or defenses, including any future Enforcement Actions brought by Defendants following the expiration of any injunction staying or voluntary forbearance of Enforcement Actions except as described above in Paragraph 4.

Respectfully submitted this 26th day of November, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2025, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Melissa Rodriguez

An employee of Andersen Beede Weisenmiller

