

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

KalshiEx LLC,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No. 23-cv-03257-JMC
	)	
Commodity Futures Trading Commission,	)	
	)	
<i>Defendant.</i>	)	

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**MOTION OF PARADIGM OPERATIONS LP  
FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF  
IN SUPPORT OF PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

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Paradigm Operations LP (“Paradigm”) respectfully moves this Court for leave to file an amicus curiae brief in support of Plaintiff KalshiEx LLC’s Motion for Summary Judgment. In support of this motion, and under Local Civil Rules 7(m) and (o), Paradigm states as follows:

1. Paradigm is an American investment firm that backs entrepreneurs building companies and protocols that leverage crypto and related technologies at the frontier of innovation. Paradigm takes a hands-on approach to helping these projects achieve their full potential. It provides services that range from technical (mechanism design, smart contract security, and engineering) to operational (recruiting and regulatory strategy).

2. Paradigm has an interest in this case because prediction markets could be an impactful use case for crypto and related technologies in which Paradigm invests. Paradigm also has an interest in supporting the broad availability of regulated prediction markets, which are a valuable source of public information and allow market participants (including crypto investors and entrepreneurs) to hedge their exposure to specific events.

3. An amicus brief from Paradigm is desirable because Paradigm's investment experience gives it an on-the-ground view of how today's most innovative companies manage risk.

4. The matters asserted in Paradigm's brief are relevant to the disposition of this case because a key legal question before the Court is whether event contracts involving Congressional control are in the public interest. Paradigm's brief draws on Paradigm's market experience to give examples and explain multiple ways in which these event contracts are in the public interest.

5. Paradigm's position is not adequately represented by the parties because the parties lack Paradigm's real-world investment experience in crypto and related technologies.

6. This motion is filed one week after Plaintiff filed its Motion for Summary Judgment, and almost four weeks before Defendant's response is due. Therefore, granting this motion would not unduly burden the parties and would not unduly delay the Court's consideration of this case.

7. Counsel for Plaintiff has stated that Plaintiff consents to this motion.

8. Counsel for Defendant has stated that Defendant does not oppose this motion.

For these reasons, Paradigm respectfully requests that the Court grant this motion for leave to file the attached brief. A proposed order is also attached to this motion.

Dated: February 1, 2024

Respectfully submitted.

*s/ Scott A. Keller*

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**Certificate of Service**

I hereby certify that on February 1, 2024, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have consented to electronic notification.

*s/ Scott A. Keller*

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Scott A. Keller

*Counsel for Amicus Curiae*