

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Pending)

**SUPPLEMENTAL DECLARATION OF EDGAR W. MOSLEY II
IN SUPPORT OF FIRST DAY PLEADINGS**

I, Edgar W. Mosley II, hereby declare under penalty of perjury as follows:

1. I supervise the team at Alvarez & Marsal North America LLC (“A&M”) that works as proposed financial advisor to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”).

2. Except as otherwise indicated, all facts set forth in this declaration (the “Declaration”) are based on my personal knowledge, information obtained from the Debtors and their advisors, including the A&M team working under my supervision, my review of relevant documents and information concerning the Debtors’ operations, financial affairs or restructuring initiatives or my opinions based on my experience and knowledge. If called as a witness, I would testify competently to the statements set forth in this Declaration.

3. Attached as Schedule 1 is a consolidated cash projection for the Debtors for the five week period beginning November 21, 2022 as well as a separate cash projection over the same period for each of the four primary groups of Debtors identified to me by the Chief Executive Officer of the Debtors (the “Silos”). I supervised the creation of these cash

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

projections by A&M. The Debtors' situation is fluid and the projection of the Debtors' receipts, expenses, professional fees and other disbursements may prove to be inaccurate. Nevertheless, I believe the projections to be reasonable ones based on the facts as I understand them and the inputs that I have received.

4. The Debtors and the A&M team continue to identify and verify assets of the Debtors on a rolling basis since the Petition Date. I supervise the A&M team involved in this process. Attached as Schedule 2 is an updated summary of cash balances in the name of the Debtors and Non-Debtors with banking and other financial institutions that A&M has been able to substantiate as of the date of this Declaration. Schedule 2 identifies substantially higher cash balances than the Debtors were in a position to substantiate as of Wednesday, November 16, for purposes of the *Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 24]. The Debtors and A&M continue to identify and verify Debtor assets.

5. I have reviewed the proposed Postpetition Cash Management System in the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief* [D.I. 47] and find them to be reasonable for the management of the Debtors' cash during the next five weeks.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 21, 2022

/s/ Edgar W. Mosley II

Name: Edgar W. Mosley II
Alvarez & Marsal North America, LLC
Title: Senior Managing Director

Schedule 1

5-Week Cash Flow Forecast

Dated: November 21, 2022

CONSOLIDATED

(\$ in 000s)

Forecast Week:	1	2	3	4	5	5-Week
Week Ending Date:	11/25/22	12/02/22	12/09/22	12/16/22	12/23/22	Total
OPERATING DISBURSEMENTS						
Payroll & Benefits	\$ (2,739)	\$ -	\$ -	\$ (1,276)	\$ (545)	\$ (4,560)
Critical Vendor Payments	-	(5,110)	(1,396)	(1,396)	(1,396)	(9,299)
Other Operating Disbursements	-	-	(5,722)	(1,623)	(1,623)	(8,968)
Total Operating Disbursements	\$ (2,739)	\$ (5,110)	\$ (7,119)	\$ (4,295)	\$ (3,565)	\$ (22,827)
Net Cash Flow	\$ (2,739)	\$ (5,110)	\$ (7,119)	\$ (4,295)	\$ (3,565)	\$ (22,827)
AVAILABLE CASH						
Beginning Available Cash	\$ 481,874	\$ 479,135	\$ 474,025	\$ 466,906	\$ 462,611	\$ 481,874
(+/-) Net Cash Flow	(2,739)	(5,110)	(7,119)	(4,295)	(3,565)	(22,827)
Ending Available Cash	\$ 479,135	\$ 474,025	\$ 466,906	\$ 462,611	\$ 459,047	\$ 459,047

WRS SILO

(\$ in 000s)

Forecast Week:	1	2	3	4	5	5-Week
Week Ending Date:	11/25/22	12/02/22	12/09/22	12/16/22	12/23/22	Total
OPERATING DISBURSEMENTS						
Payroll & Benefits	\$ (774)	\$ -	\$ -	\$ (774)	\$ -	\$ (1,549)
Critical Vendor Payments	-	(2,450)	(883)	(883)	(883)	(5,100)
Other Operating Disbursements	-	-	(4,972)	(872)	(872)	(6,716)
Total Operating Disbursements	\$ (774)	\$ (2,450)	\$ (5,855)	\$ (2,530)	\$ (1,755)	\$ (13,365)
Net Cash Flow	\$ (774)	\$ (2,450)	\$ (5,855)	\$ (2,530)	\$ (1,755)	\$ (13,365)
AVAILABLE CASH						
Beginning Available Cash	\$ 68,911	\$ 68,137	\$ 65,687	\$ 59,832	\$ 57,302	\$ 68,911
(+/-) Net Cash Flow	(774)	(2,450)	(5,855)	(2,530)	(1,755)	(13,365)
Ending Available Cash	\$ 68,137	\$ 65,687	\$ 59,832	\$ 57,302	\$ 55,547	\$ 55,547

5-Week Cash Flow Forecast

Dated: November 21, 2022

DOTCOM SILO

(\$ in 000s)

Forecast Week: Week Ending Date:	1 11/25/22	2 12/02/22	3 12/09/22	4 12/16/22	5 12/23/22	5-Week Total
<u>OPERATING DISBURSEMENTS</u>						
Payroll & Benefits	\$ (1,442)	\$ -	\$ -	\$ (231)	\$ (293)	\$ (1,966)
Critical Vendor Payments	-	(2,450)	(304)	(304)	(304)	(3,361)
Other Operating Disbursements	-	-	(521)	(521)	(521)	(1,562)
Total Operating Disbursements	\$ (1,442)	\$ (2,450)	\$ (824)	\$ (1,055)	\$ (1,118)	\$ (6,889)
Net Cash Flow	\$ (1,442)	\$ (2,450)	\$ (824)	\$ (1,055)	\$ (1,118)	\$ (6,889)
<u>AVAILABLE CASH</u>						
Beginning Available Cash ^(a)	\$ 33,692	\$ 32,251	\$ 29,801	\$ 28,976	\$ 27,921	\$ 33,692
(+/-) Net Cash Flow	(1,442)	(2,450)	(824)	(1,055)	(1,118)	(6,889)
Ending Available Cash	\$ 32,251	\$ 29,801	\$ 28,976	\$ 27,921	\$ 26,804	\$ 26,804

(a) Excludes cash held at non-US banking institutions

ALAMEDA SILO

(\$ in 000s)

Forecast Week: Week Ending Date:	1 11/25/22	2 12/02/22	3 12/09/22	4 12/16/22	5 12/23/22	5-Week Total
<u>OPERATING DISBURSEMENTS</u>						
Payroll & Benefits	\$ (523)	\$ -	\$ -	\$ (271)	\$ (252)	\$ (1,046)
Critical Vendor Payments	-	(200)	(200)	(200)	(200)	(798)
Other Operating Disbursements	-	-	(195)	(195)	(195)	(586)
Total Operating Disbursements	\$ (523)	\$ (200)	\$ (395)	\$ (666)	\$ (647)	\$ (2,430)
Net Cash Flow	\$ (523)	\$ (200)	\$ (395)	\$ (666)	\$ (647)	\$ (2,430)
<u>AVAILABLE CASH</u>						
Beginning Available Cash	\$ 370,584	\$ 370,061	\$ 369,861	\$ 369,466	\$ 368,801	\$ 370,584
(+/-) Net Cash Flow	(523)	(200)	(395)	(666)	(647)	(2,430)
Ending Available Cash	\$ 370,061	\$ 369,861	\$ 369,466	\$ 368,801	\$ 368,154	\$ 368,154

5-Week Cash Flow Forecast

Dated: November 21, 2022

VENTURES SILO

(\$ in 000s)

Forecast Week: Week Ending Date:	1 11/25/22	2 12/02/22	3 12/09/22	4 12/16/22	5 12/23/22	5-Week Total
<u>OPERATING DISBURSEMENTS</u>						
Critical Vendor Payments	\$ -	\$ (10)	\$ (10)	\$ (10)	\$ (10)	\$ (40)
Other Operating Disbursements	-	-	(35)	(35)	(35)	(104)
Total Operating Disbursements	\$ -	\$ (10)	\$ (45)	\$ (45)	\$ (45)	\$ (144)
Net Cash Flow	\$ -	\$ (10)	\$ (45)	\$ (45)	\$ (45)	\$ (144)
<u>AVAILABLE CASH</u>						
Beginning Available Cash	\$ 8,686	\$ 8,686	\$ 8,676	\$ 8,632	\$ 8,587	\$ 8,686
(+/-) Net Cash Flow	-	(10)	(45)	(45)	(45)	(144)
Ending Available Cash	\$ 8,686	\$ 8,676	\$ 8,632	\$ 8,587	\$ 8,543	\$ 8,543

Schedule 2

FTX Group

Summary of Cash Balances

November 20, 2022

('000s in USD)	Filing Type	Unrestricted Cash	Custodial Cash	Other Restricted Cash	Total Cash
Alameda Silo					
Alameda Research Ltd	Debtor	\$ 364,040	\$ 14,296	\$ 14,800	\$ 393,136
Maclaurin Investments Ltd.	Debtor	2,752	-	-	2,752
Ledger Prime LLC	Debtor	2,231	-	-	2,231
North Dimension Inc	Debtor	801	-	-	801
Alameda Research LLC	Debtor	759	2	-	761
Alameda Research KK	Debtor	1	-	-	1
LedgerPrime Digital Asset Opportunities Fund, LLC	Debtor	-	-	524	524
LedgerPrime Digital Asset Opportunities Master Fund LP	Debtor	-	-	630	630
Alameda Debtor Accounts		\$ 370,584	\$ 14,298	\$ 15,955	\$ 400,836
Dotcom Silo					
FTX Japan K.K.	Debtor	\$ 30,000	\$ 52,057	\$ 89,595	\$ 171,651
FTX EU Ltd (K-DNA Financial Services Ltd)	Debtor	1,251	47,926	176	49,352
Quoine Pte Ltd	Debtor	-	8,477	2,676	11,153
FTX Exchange FZE	Debtor	-	-	5,813	5,813
FTX Trading Ltd	Debtor	376	2,738	-	3,114
FTX TURKEY TEKNOLOJİ VE TİCARET ANONİM ŞİRKET	Debtor	-	3,070	37	3,106
FTX Europe AG	Debtor	-	-	2,793	2,793
Blockfolio, Inc.	Debtor	2,417	-	-	2,417
Crypto Bahamas LLC	Debtor	900	-	-	900
FTX Japan Services KK	Debtor	752	-	-	752
Quoine Vietnam Co. Ltd	Debtor	495	-	-	495
FTX Japan Holdings K.K.	Debtor	379	-	-	379
FTX Digital Holdings (Singapore) Pte Ltd	Debtor	254	-	-	254
FTX Trading GmbH	Debtor	146	-	-	146
Liquid Securities Singapore Pte Ltd	Debtor	-	-	111	111
FTX Switzerland GmbH	Debtor	17	-	-	17
Quoine India Pte Ltd	Debtor	3,183	-	-	3,183
Dotcom Debtor Accounts		\$ 40,169	\$ 114,267	\$ 101,200	\$ 255,635
Ventures Silo					
Paper Bird Inc	Debtor	\$ 7,907	\$ -	\$ -	\$ 7,907
FTX Ventures Ltd	Debtor	780	-	-	780
Ventures Debtor Accounts		\$ 8,686	\$ -	\$ -	\$ 8,686
WRS Silo					
West Realm Shires Services Inc.	Debtor	\$ 32,340	\$ 15,194	\$ 1,271	\$ 48,804
West Realm Shires Inc.	Debtor	35,412	-	-	35,412
West Realm Shires Financial Services Inc.	Debtor	577	-	-	577
FTX Lend Inc.	Debtor	485	-	-	485
Ledger Holdings Inc.	Debtor	98	-	-	98
Digital Custody Inc.	Debtor	-	-	982	982
WRS Debtor Accounts		\$ 68,911	\$ 15,194	\$ 2,253	\$ 86,358
Total Debtor Entities		\$ 488,350	\$ 143,758	\$ 119,407	\$ 751,515
Alameda Silo					
Alameda Non-Debtor Accounts					
Dotcom Silo					
FTX Digital Markets Ltd	Non-Debtor	\$ 617	\$ 92,572	\$ 50,000	\$ 143,189
FTX Philanthropy Inc	Non-Debtor	10,877	-	-	10,877
Dotcom Non-Debtor Accounts		\$ 11,495	\$ 92,572	\$ 50,000	\$ 154,066
WRS Silo					
Embed Clearing LLC.	Non-Debtor	-	-	29,979	29,979
Embed Financial Technologies Inc	Non-Debtor	395	-	-	395
LedgerX LLC	Non-Debtor	13,644	24,103	265,603	303,350
WRS Non-Debtor Accounts		14,040	24,103	295,582	333,725
Total Non-Debtor Entities		\$ 25,534	\$ 116,675	\$ 345,581	\$ 487,791
Grand Total		\$ 513,884	\$ 260,433	\$ 464,989	\$ 1,239,306