

FILED: Aug 11, 2026, 8:27 am

BY DEPUTY:
Ms. KRYSHAWNA CHARLESTON

IN THE BUSINESS COURT OF TEXAS

FIRST DIVISION

GARY GUILLAUME, derivatively and on §
behalf of COINBASE GLOBAL, INC., §

Plaintiff, §

v. §

BRIAN ARMSTRONG, MARC L. §
ANDREESSEN, EMILIE CHOI, §
FREDERICK E. EHRSAM III, PAUL §
GREWAL, ALESIA J. HAAS, KATHRYN §
HAUN, JENNIFER JONES, KELLY A. §
KRAMER, TOBIAS LÜTKE, GOKUL §
RAJARAM, and FRED WILSON, §

Defendants, §

-and- §

COINBASE GLOBAL, INC., a Texas §
Corporation, §

Nominal Defendant. §

Cause No. 26-BC01A-0052

PUBLIC NOTICE OF MOTION TO SEAL COURT RECORDS

PLEASE TAKE NOTICE that, pursuant to Texas Rule of Civil Procedure 76a(3), Plaintiff Gary Guillaume (“Plaintiff”) posts this notice to seal court records:

1. Plaintiff filed suit derivatively on behalf of Coinbase Global, Inc. (“Coinbase”) against Brian Armstrong, Marc L. Andreessen, Emilie Choi, Frederick E. Ehrsam III, Paul Grewal, Alesia J. Haas, Kathryn Haun, Jennifer Jones, Kelly A. Kramer, Tobias Lütke, Gokul Rajaram, and Fred Wilson (the “Individual Defendants” and, collectively with Coinbase, “Defendants”),

alleging, *inter alia*, that the Individual Defendants breached their fiduciary duties and engaged in other violations of state law.

2. In this case, Plaintiff has filed a motion to seal unredacted versions of the following court records, which consists of documents and other information Plaintiff obtained from Coinbase in response to a books and records demand made pursuant to 8 *Del. C.* § 220 and Delaware common law (“220 Demand”):

- a. Plaintiff’s Verified Shareholder Petition;
- b. Plaintiff’s Opposition to Defendants’ Rule 91 Special Exception to Derivative Action Petition;
- c. Plaintiff’s Opposition to Defendants’ Motion to Stay Derivative Action Pending Resolution of Related Securities Class Action; and
- d. All future filings in this matter that reproduce, quote, or attach documents or other information Plaintiff obtained from Coinbase in response to Plaintiff’s 220 Demand.

3. The documents listed above contain confidential, proprietary business information of Coinbase, and would cause irreparable harm if disclosed.

4. The hearing on the motion to seal court records will be held in open court on September 1, 2026, at 1:00 PM CDT. The hearing will be conducted via Zoom and is accessible via the following link: <https://txcourts.zoom.us/j/83894947856>.

5. Any person may intervene and be heard concerning the sealing of the Court’s records.

Dated: August 11, 2026

THE BROWN LAW FIRM, P.C.

/s/ Saadia Hashmi

Saadia Hashmi (State Bar No.: 24139546)

1350 Avenue of the Americas, Suite 1200

New York, NY 10019

Telephone: (516) 922-5427

Facsimile: (516) 344-6204

Email: shashmi@thebrownlawfirm.net

Counsel for Plaintiff