

**IN THE MATTER OF
POLO DIGITAL ASSETS, LTD.**

File No. 2021-17

**MOTION OF CRAWLEY MACKEWN BRUSH LLP AS FORMER COUNSEL FOR
THE RESPONDENT, POLO DIGITAL ASSETS, LTD**
(Motion to be removed as the Respondent's Representative of Record)
(Rules 21(2) and 28(4))

A. ORDER SOUGHT

The Moving Party, Crawley MacKewn Brush LLP (“CMB”), as former counsel for the Respondent Polo Digital Assets, Ltd (“Polo”), with notice, requests that the Ontario Securities Commission make the following orders:

1. An Order removing CMB as Polo's representative of record in the within proceeding; and
2. If necessary, an Order abridging the time for delivery of CMB's motion materials.

B. GROUNDS

The grounds for the motion are as follows:

1. In or around June 2021, Polo retained CMB to represent Polo in the within proceeding.
2. On April 18, 2022, Polo advised counsel at CMB that Polo was terminating its retainer agreement with CMB with immediate effect.
3. On April 19, 2022, counsel at CMB advised OSC Staff that CMB's retainer agreement had been terminated, that CMB was no longer instructed to represent Polo in this matter, and that CMB would be bringing a motion to be removed as Polo's representative of record.

4. Rules 21(2) and 28(4) of the *Ontario Securities Commission Rules of Procedure and Forms*.
5. Such further and other grounds as counsel may request and the Commission deems just.

C. EVIDENCE

The Moving Party intends to rely on the following evidence for the motion:

1. The Affidavit of Jonathan Preece sworn April 19, 2022; and
2. Such further and other evidence as counsel may advise and the Commission may permit.

DATED this 20th day of April, 2022.

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