UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA, Plaintiff, v. ZEALTHY, INC. and KYLE ROBERTSON, Defendants.	Case No. 24-cv-21376-RAR

DEFENDANT ZEALTHY, INC.'S NOTICE OF WITHDRAWAL OF MOTION FOR PROTECTIVE ORDER AND NOTICE OF COMPLIANCE WITH COURT-MANDATED CONFERRAL

Pursuant to Fed. R. Civ. P. 30 and the Court's Order on Defendants' Motion for Protective Order, Defendant Zealthy, Inc. ("Zealthy") provides notice of withdrawal of its motion notice of compliance with the court-mandated conferral (the 'Notice") regarding the deposition of Zealthy's former general counsel, Umar Cash. In support thereof, Zealthy states as follows:

1. On May 14, 2026, Zealthy filed a Notice of Hearing objecting to Mr. Cash's deposition and requesting that the deposition be postponed.

2. On May 19, 2026, the Court held a hearing on Defendants' *Ore Tenus* Motion for Protective Order. Following the hearing, the Court set a briefing schedule on the Motion, pursuant to which Defendant's Motion must be filed no later than June 9, 2026. The Court also ordered the Parties to confer to "narrow, to the extent feasible, the topics noticed for Mr. Cash's deposition" before June 9, 2026 [ECF No. 250].

3. After conferring pursuant to the Court's Order, the Parties reached an agreement regarding the scope of Mr. Cash's deposition. Subject to these mutually agreed upon limitations,

Zealthy withdraws its Motion. As such, the Parties will no longer need to brief the issues raised to the Court on May 19, 2026.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(A)

On May 29, 2026 and June 8, 2026, the Parties conferred and resolved this dispute. The government has reviewed this Notice and does not object to it.

Dated: June 8, 2026

Respectfully submitted,

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Attorney for Defendants, Zealthy, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 8, 2026, I electronically filed the foregoing document with the Clerk of Court using CM/ECF and is being served on all counsel of record.

/s/ Benjamin G. Greenberg
BENJAMIN G. GREENBERG