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17 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
18 **IN AND FOR CARSON CITY**

19 STATE OF NEVADA ex rel. NEVADA
20 GAMING CONTROL BOARD,

21 Plaintiff,

22 v.

23 BLOCKRATIZE, INC., d/b/a POLYMARKET;
24 QCX, LLC, d/b/a POLYMARKET US; and
ADVENTURE ONE QSS, INC., d/b/a
25 POLYMARKET,

26 Defendants.

Case No. 26-OC-00012-1B
Department No. I

27 **DEFENDANTS' PRELIMINARY RESPONSE AND RENEWED REQUEST FOR**
28 **OPPORTUNITY TO FILE FULL OPPOSITION TO PLAINTIFF'S RENEWED**
APPLICATION FOR EX PARTE TEMPORARY RESTRAINING ORDER

1 Defendants BLOCKRATIZE, INC., d/b/a POLYMARKET, and QCX, LLC, d/b/a
2 POLYMARKET US (“Defendants”), by and through their counsel, hereby provide the following
3 preliminary response:¹

4 REQUEST FOR RELIEF

5 The Court should deny the Nevada Gaming Control Board’s renewed request for an *ex parte*
6 temporary restraining order. The Board has not met the demanding standard required for such
7 extraordinary relief. The Court should instead permit Defendants to file a full opposition to the Board’s
8 application for injunctive relief, in accordance with a normal briefing schedule, on or before February
9 2, 2026. The Court should then hear arguments on any request for a temporary restraining order or
10 preliminary injunction.

11 This is the Board’s second attempt to obtain extraordinary *ex parte* relief without affording
12 Defendants a meaningful opportunity to be heard. The Court has already rejected the Board’s first effort
13 as “deficient.” Order Denying TRO at 2. The Board’s renewed application fares no better. Although
14 the Board repackages its allegations in a newly sworn declaration, it still fails to present the “specific
15 facts” that “clearly show” an immediate and irreparable injury necessary to justify *ex parte* relief under
16 N.R.C.P. 65(b)(1)(A). Worse, the Board either has not filed or (in violation of this Court’s Friday order)
17 has not served Defendants with a proposed order for the renewed motion. So, as with the Board’s first
18 filing, Defendants have no way of knowing precisely what the Board is asking the Court to order
19 Defendants to do – or how it differs from the original request.

20 Equally troubling, the Board’s submission omits material facts known to it that undermine any
21 claim of emergency, including:

22 1. Jurisdictional Misstatements. Defendant Adventure One QSS is a Panamanian corporation
23 that does no business in Nevada. The Board nevertheless seeks emergency relief against that foreign
24 entity.

25
26
27 ¹ Adventure One QSS, Inc, is not a U.S. corporation and does no business in Nevada. To the extent
28 necessary, this should be considered a special appearance. Defendants do not waive—and expressly
reserve—all defenses available to them, including, without limitation, improper service of process and
lack of personal jurisdiction.

1 Court should set an immediate hearing. *See* N.R.C.P. 65(b)(3). Lead counsel for Defendants would
2 be available for that hearing any day from February 4 through February 18 except February 12.

3 **Affirmation Pursuant to NRS 239B.030**

4 The undersigned does hereby affirm that the preceding document does not contain the social
5 security number of any person.

6 DATED this 27 day of January 2026.

7 DOTSON, HAYWARD & VANCE PC

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28 *POLYMARKET US*

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of DOTSON, HAYWARD & VANCE, PC and that on this date I caused to be served a true and correct copy of the foregoing by:

- (BY MAIL) on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At Dotson, Hayward & Vance, PC, mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.
- By electronic service by filing the foregoing with the Clerk of Court using the E-Flex system, which will electronically mail the filing to the following individuals.
- (BY PERSONAL DELIVERY) by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.
- (BY FACSIMILE) on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.
- Email.

addressed as follows:

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DATED this 27 day of January 2026.



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