UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERTC EXPRESS LLC, Plaintiff, v. REGULUS GROUP LLC and XBP GLOBAL HOLDINGS, INC., Defendants.	:	Case No. 1:25-cv-08490-ER **CONSENT ORDER**

THIS MATTER having been brought before this Court upon Plaintiff ERTC Express's Motion for an Order to Show Cause for a Temporary Restraining Order (hereinafter "Motion") to enjoin Defendant Regulus Group LLC ("Regulus") and XBP Global Holdings (hereinafter "XBP") from allowing certain post office boxes to expire or lapse [ECF. 42]; and Regulus only (not XBP), through its counsel, consenting to the relief stated below; and ERTC, through its counsel, moving to withdraw its Motion [ECF. 42] upon the entry of this Order; and the parties, through their counsel, having consented to the entry of this Order to avoid the need for further Court proceedings on the issue; and for good cause shown and no cause to the contrary appearing:

IT IS on this 21st day of November, 2025, **ORDERED** that:

(1) Regulus agrees it will provide a list of ERTC clients and box numbers to ERTC by November 24, 2025, and ERTC shall notify Regulus on or before November 25, 2025 the exact list of clients/boxes and total number that it wishes to renew.

(2) Along with the list, on or before November 25, 2025, the parties agree that ERTC will wire Regulus the amount of $89 times the total number of ERTC boxes that it has selected renew. For example, if ERTC elects to renew 2000 PO boxes, then it would need to wire $178,000 ($89 x 2000).

(3) After it receives the wire payment above and the related list of ERTC related boxes to be renewed, Regulus agrees it will renew the requested boxes for a period of 12 months and will confirm the same.

(4) Regulus shall maintain and/or preserve any IRS Treasury checks that it may have for ERTC clients, whether in postal boxes or wherever they are located, and to treat any future checks that are received in the future in the same manner, until such time that the parties enter a written agreement or further order of this Court.

(6) ERTC hereby withdraws its Motion for an Order to Show Cause for a Temporary Restraining Order [ECF. 42].

Dated: November 21, 2025

Honorable Edgardo Ramos, U.S.D.J.