IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

George Zambrana Plaintiff/Petitioner v. Jane Doe, et al. Defendant/Respondent	Case No. 2025 CH 11647

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To:
Foris DAX, Inc.
Illinois Corporation Service Company
801 Aldai Stevenson Drive; Springfield, IL 62703

1. ☐ YOU ARE COMMANDED to appear to give your testimony before the

   Honorable _____ in Room _____ ,

   _____ , Illinois on _____

   at _____ ○ AM ○ PM

2. ☐ YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public

   at: _____ in Room _____ ,

   _____ , Illinois on _____

   at _____ ○ AM ○ PM

3. YOU ARE COMMANDED to mail the following documents in your possession or control

   to Esbrook P.C. at 321 N Clark St Ste 1930, Chicago, IL 60654 ,

   on or before 10/28/2026 at 10:00 ◉ AM ○ PM
   (THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

   See attached rider. Documents may also be emailed to kirk.watkins@esbrook.com and taras.garapiak@esbrook.com

   ☐ Description continued on attached page(s).

Your failure to respond to this subpoena will subject you to punishment for contempt of this Court.

Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

Notice to Deponent:

1. ☐ The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:

   _____

   ☐ Description continued on attached page(s).
   (A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

2. ☐ The deponent's testimony will be recorded by use of an audio-visual recording device, operated

   by _____ .
   (Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

☑ Atty. No.: 62618
☐ Pro Se 99500

Name: Taras Garapiak
Atty. for (if applicable): Plaintiff

Address: 321 N Clark St Ste 1930
City: Chicago
State: IL Zip: 60654
Telephone: 312-319-7680
Primary Email: taras.garapiak@esbrook.com

Issued by: /s/ *Garapiak*
Signature
◉ Attorney ○ Clerk of Court

Date: 09/28/2026

☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2),

to _____ by certified mail, return receipt requested

(Receipt # _____) on _____ . I paid the witness $ _____ for witness and mileage fees.

☐ I served this subpoena by handing a copy to _____

on _____ . I paid the witness $ _____ for witness and mileage fees.

/s/ _____ _____
(Signature of Server) (Print Name)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

George Zambrana, on behalf of himself and all others similarly situated	
Plaintiff	Case No. 2025 CH 11647
v.	Honorable John H. Ehrlich
Jane Doe, et al.	Calendar 9
Defendants	

RIDER TO SUBPOENA IN A CIVIL MATTER FOR PRODUCTION OF DOCUMENTS TO CRYPTO.COM

Pursuant to the Subpoena to which this Rider is attached, Foris DAX, Inc. ("Crypto.com") is commanded to provide the following documents to the aforementioned counsel for Plaintiff George Zambrana in the method set forth in the Subpoena, and in accordance with the Definitions and Instructions in this Rider, no later than October 28, 2026.

DEFINITIONS

The following definitions shall apply to these Requests:

1. "Persons" or "Entities" means each and every individual, corporation, partnership, joint venture, social or political organization or any other entity, whether real or judicial or incorporated or unincorporated, encompassed within the usual and customary meaning of "person" or "entity," or otherwise encompassed within this definition.

2. "Communicate" or "Communication" means and includes every manner or means of disclosure, transfer, or exchange of information, whether done orally or in writing, face-to-face, by telephone, telecopier, mail, e-mail, facsimile, personal delivery, overnight delivery, or otherwise.

3. "Document" or "Documents" means every original (and every copy of any original or copy which differs in any way from any original), every writing or recording of every kind or description, whether handwritten, typed, drawn, sketched, printed, or recorded by any physical, mechanical, magnetic, photographic, phonographic, electronic, or electrical means whatsoever, including without limitation, books, records, papers, pamphlets, brochures, circulars, advertisements, specifications, blueprints, maps, plats, surveys, drawings, sketches, graphs, charts, plans, laboratory or engineering reports, correspondence, communications, telegrams, memoranda, notes, notebooks, worksheets, reports, lists, analyses, summaries, ledgers, accounts, audits, inventories, tax returns, financial statements, profit and loss statements, cash flow statements, balance sheets, annual or other periodic reports, prospectuses, registrations, solicitations, minutes, stock ledgers, stock certificates, licenses, permits, calendars, appointment books, diaries, telephone bills and any other call records, expense reports, commission statements, itineraries, agendas, payroll records, checkbooks, canceled checks, receipts, contracts, agreements, instruments, assignments, applications, offers, acceptances, proposals, financing statements, documents of title, appraisals, purchase orders, invoices, bills of lading, written memorializations of oral communications, forecasts, photographs, photographic slides or negatives, films, filmstrips, tapes, recordings, electronic mail messages, text messages, instant messages, slack messages, hard disks, floppy disks, compact disks, magnetic tapes, computer tapes, any other type of computer media, and computer memory. This definition of "document" or "documents" includes electronic data in all its forms, including, but not limited to, information stored or maintained on, or which could be reproduced from, microfilm, computer printout, computerized backup media, cloud storage, or similar means.

4. The term "ESI" means any electronically stored documents and information – including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations – stored in any medium from which information can be obtained either directly, or, if necessary, after translation by the responding party into a reasonably usable form.

5. The term "metadata" means the electronic information describing the history, tracking, or management of an electronic document. Metadata may include (but shall not be limited to) the name of the file creator, the name of the last editor, the number of times printed, the number of revisions, any deleted text, document comments, and the name of the document file.

6. "Relating to," "concerning," and/or "regarding, or any form thereof, means directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon a stated subject matter.

7. The words "and" and "or" shall be construed both conjunctively and disjunctively. The singular shall be deemed to refer to the plural, and vice versa.

8. "You" or "Crypto.com" shall mean Foris DAX, Inc.

9. "Plaintiff" shall mean George Zambrana.

10. "Frozen Wallet" shall mean the virtual currency address for any cryptocurrency wallet identified in Appendix A to this Rider.

11. "Associated Wallets" shall mean any additional virtual currency addresses and/or accounts for cryptocurrency wallets linked to or associated with any person or entity that owns or controls, or has ever owned or controlled, one or more Frozen Wallets.

INSTRUCTIONS

1. Each Request below is to be construed and responded to separately and independently and is not to be referenced to any other Request for purposes of limitation or exclusion.

2. These Requests are continuing and require prompt supplemental responses if, between the date hereof and the conclusion of this matter, additional Documents and Communications responsive to these Requests become known or available to You.

3. The Documents and Communications requested herein are to be produced as they are kept in the usual course of business, organized and labeled to correspond to the numbered paragraphs and/or categories of particular requests. If responsive documents are kept in electronic format, such documents shall be produced in electronic format, forensically collected to preserve metadata.

4. In construing these Requests, the following rules shall apply:

a. The connectives "and," "or," and "and/or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed as being outside of its scope.

b. "Any" as used herein includes the word "all," and the word "all" as used herein includes the word "any."

c. "All" shall be construed to include the word "each," and the word "each" shall be construed to include the word "all."

d. "Each" as used herein includes the word "every," and the word "every" as used herein includes the word "each."

e. "Including" shall mean "including, but not limited to."

f. The singular shall include the plural and vice versa.

g. The use of masculine, feminine, or neutral genders shall include each gender, as appropriate in context.

5. In the event that You do not have Documents or Communications within Your possession, custody, or control that are responsive to the Requests set forth below, Your response to such Request shall specifically state that You have no responsive Documents or Communications within Your possession, custody, or control, and shall state what efforts were made to obtain the unavailable material, regardless of whether or not You also interpose any objection to such Request.

6. A Request for Documents concerning any topic includes, but is not limited to, Documents constituting Communications on the described topic, and vice versa.

7. Unless otherwise indicated, the time period for these Requests is January 1, 2024 through the present.

REQUESTS

1. Documents sufficient to identify the Persons or Entities that own, control, or have ever owned or controlled any of the Frozen Wallets, including the following information:

   a. legal names;

   b. dates of birth (for individuals) or date of formation (for entities);

   c. residential and/or business addresses;

   d. email addresses;

   e. phone numbers;

   f. government-issued identification used for account verification; and

   g. any other identifying information collected under applicable Know Your Customer (KYC) procedures.

2. Documents sufficient to show the current balance of each Frozen Wallet, including a breakdown by cryptocurrency type, amount, and USD equivalent, as of the date of production.

3. Transaction records sufficient to show all cryptocurrency deposits into each Frozen Wallet from January 1, 2024 to present, including the following for each transaction:

   a. date and time;

   b. amount and cryptocurrency type;

   c. originating wallet address;

   d. originating account holder (including names and contact information); and

   e. transaction hash or blockchain ID.

4. Transaction records sufficient to show all cryptocurrency withdrawals and/or transfers from each Frozen Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. destination wallet address;

d. destination account holder (including names and contact information); and

e. transaction hash or blockchain ID.

5. Documents sufficient to identify any and all Associated Wallets, including the following information for each Associated Wallet:

a. internal account IDs;

b. customer profiles;

c. current balance;

d. deposit transaction records;

e. withdrawal transaction records;

f. transfer transaction records.

6. Documents sufficient to show the current balance of each Associated Wallet, including a breakdown by cryptocurrency type, amount, and USD equivalent, as of the date of production.

7. Transaction records sufficient to show all cryptocurrency deposits into each Associated Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. originating wallet address;

d. originating account holder (including names and contact information); and

e. transaction hash or blockchain ID.

8. Transaction records sufficient to show all cryptocurrency withdrawals and/or transfers from each Associated Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. destination wallet address;

d. destination account holder (including names and contact information); and

e. transaction hash or blockchain ID.

9. All internal investigation notes, compliance alerts, suspicious activity reports (SARs), fraud alerts, or other internal memoranda referring to any Frozen Wallet or Associated Wallet and/or any Person or Entity that owns, controls, or has ever owned or controlled such wallets.

Date: September 28, 2026

Respectfully submitted,

/s/ Taras Garapiak

Michael Kozlowski
Kirk Watkins
Taras Garapiak
Esbrook P.C.
321 North Clark Street, Suite 1930
Chicago, Illinois 60654
312.319.7680
michael.kozlowski@esbrook.com
kirk.watkins@esbrook.com
taras.garapiak@esbrook.com

Counsel for Plaintiff George Zambrana

Appendix A — Frozen Wallets

Exchange	Wallet Address
Crypto.com	0x8144A415a61B8A192f9955707DD4Fd31C871E8AE
Crypto.com	0x613e426654a8706cda55b0A6689cF816D03a6BfD