

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE, COUNTY, FLORIDA**

CETUS TECHNOLOGY LIMITED, a British  
Virgin Islands Company,

Case No. 2025-10992 CA 01

Plaintiff,

v.

DOE NOS. 1-25

Defendants.

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**PLAINTIFF'S MOTION TO TRANSFER TO COMPLEX  
BUSINESS LITIGATION DIVISION**

COMES NOW, the Plaintiff, CETUS TECHNOLOGY LIMITED, by and through his attorney, pursuant to Florida R. Civ. P. 1.201, and moves the Court to transfer the case to the Complex Business Litigation Division, and in support thereof states:

1. This is a case involving a hack by Defendants perpetrated against Plaintiff, in which Defendants stole cryptocurrency valued at over \$200,000,000. Plaintiff was able to retrieve a portion of the stolen cryptocurrency, but there is still approximately \$60,000,000 that Plaintiff seeks in this Action.
2. The Defendants have not yet been served, but the Court granted a motion on June 29, 2025 to permit Plaintiff to serve Defendants through alternate means, and Defendants will be served shortly.
3. This case involves:
  - a. Novel legal issues that are inextricably intertwined and will be time consuming to resolve, specifically that the stolen crypto currency is located in wallets across several exchanges and platforms, which may necessitate additional parties being

included;

- b. Coordination may be required with law enforcement and criminal actions, as well as with locating Defendants that reside internationally;
  - c. There is a substantial amount of complex documentation related to the movement of the stolen cryptocurrency across several wallets and exchanges; and
  - d. The parties will benefit from the interim case management conferences due to the sensitive nature of the case and the amount in dispute.
4. Therefore, Plaintiff wishes to have the case transferred to the Complex Business Litigation Division.

#### **CERTIFICATE OF CONFERRAL**

Counsel certifies that as defendants have not been served and there was no opposing counsel to confer with. Defendants are in the process of being served through alternative means.

WHEREFORE, the undersigned requests that the Court grant this motion and transfer the case to the CBL division and any further relief which this Court deems proper.

Respectfully submitted and filed on June 30, 2025

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