

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA**

NAVIN PASEM,

Plaintiff,

Case No.: 25-CA-002901

v.

**JOHN DOE 1, JOHN DOE 2, JOHN DOE 3,
and DOES 4 through 200**

Defendants.

EX PARTE MOTION FOR SERVICE BY OTHER MEANS

COMES NOW, the Plaintiff, NAVIN PASEM, and respectfully moves the Court pursuant to Florida Statutes § 48.102 to serve the Defendants by other means, and in support thereof states:

1. The instant case involves a calculated and coordinated cryptocurrency theft scheme perpetrated by Defendants, as outlined in Plaintiff's Verified Complaint (the "Complaint").
2. The Defendants in this case appear to be foreign individuals or entities, and the only connection they have to Plaintiff is through electronic communications and the cryptocurrency wallets they control.
3. As such, after due diligence, Plaintiff cannot serve these Defendants in the traditional ways of personal service outlined in Chapter 48 of the Florida Statutes.
4. Because Defendants' identities and physical locations are unknown, and traditional methods of service are impracticable, Plaintiff seeks leave to serve the Second Amended Verified Complaint, Summons, Plaintiff's Second Renewed Emergency Ex Parte Motion for Preliminary Injunction Without Notice, Plaintiff's Motion for Service By Other Means, and all other documents filed or issued in this action via a publicly recorded blockchain transaction directed to each of the wallet addresses identified in Appendix A of the Complaint.

5. Plaintiff will execute a nominal-value transaction to each address and embed a message using the native metadata mechanism of the relevant blockchain. That message will include a hyperlink to a website created by Plaintiff's counsel, where all case documents will be published and accessible to Defendants. These wallets represent the final known destination of Plaintiff's misappropriated cryptocurrency, as confirmed by blockchain tracing analysis.
6. This proposed method is immutable, independently verifiable, and reasonably calculated to provide actual notice to Defendants under the circumstances of this case.
7. Because no defendant has been served, this motion is being submitted ex parte.

WHEREFORE, the undersigned requests that the Court:

- i. Authorize Plaintiff to serve the Second Amended Verified Complaint, Summons, Plaintiff's Second Renewed Emergency Ex Parte Motion for Preliminary Injunction Without Notice, Plaintiff's Motion for Service By Other Means, and all other documents filed or issued in this action via a publicly recorded blockchain transaction directed to each of the wallet addresses identified in Appendix A of the Complaint;
- ii. Find that this method is the best available means of service under the circumstances of this case and is reasonably calculated to give Defendants actual notice;
- iii. Deem such service sufficient pursuant to § 48.102(1), Florida Statutes; and
- iv. Direct that Defendants shall file a response to the Complaint within twenty (20) days of the execution of the blockchain-based service.

VERIFICATION

I declare under penalty of perjury under the laws of the State of Florida that the facts stated in this Motion are true and correct to the best of my knowledge.

Executed on April 4, 2025.

/s/ Navin R. Pasem
Navin R. Pasem, Esq.

Respectfully submitted,

/s/ Navin R. Pasem
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