

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

SUI FOUNDATION, LTD. d/b/a
DEEPBOOK, a British Virgin Islands
business company,

CASE NO. 2026-11531 CA 01

Plaintiff,
v.

DOE NOS. 1–25,
Defendants.

_____ /

EX PARTE MOTION FOR SERVICE BY OTHER MEANS

COMES NOW, Plaintiff, SUI FOUNDATION, LTD. d/b/a DEEPBOOK (“Plaintiff”), by and through undersigned counsel, and pursuant to section 48.102, Florida Statutes, moves this Court for entry of an Order authorizing service by other means, and in support thereof states:

1. The instant case involves the exploitation of the DeepBook Margin Protocol, theft of digital assets, conversion of cryptocurrency, laundering of stolen assets through multiple blockchain networks, and the concealment of assets through anonymous cryptocurrency wallets, all as more fully detailed in the Complaint.
2. The Defendants in this action are presently identified only as DOE NOS. 1–25 because their true identities remain unknown despite Plaintiff's investigation.
3. Through blockchain forensic tracing, Plaintiff has identified cryptocurrency wallet addresses utilized by Defendants in connection with the exploit, including wallets located on both the Sui and Ethereum blockchains.

4. Plaintiff's investigation further determined that wallets utilized by Defendants were funded through infrastructure associated with CoinEx and that CoinEx possesses records capable of identifying the individuals responsible for the exploit.
5. Despite Plaintiff's diligence, the Defendants cannot presently be served through the traditional methods contemplated by Chapter 48, Florida Statutes, because their identities, residences, and physical locations remain unknown.
6. The only known points of contact presently associated with Defendants are the blockchain wallet addresses identified through Plaintiff's forensic investigation.
7. Plaintiff therefore seeks authorization to effect service through blockchain-based communication directed to the identified wallet addresses utilized by Defendants in connection with the exploit.
8. Specifically, Plaintiff seeks authorization to serve Defendants through an on-chain message or identity message ("IDM") transaction directed to the identified cryptocurrency wallets, which will contain notice of this action together with a hyperlink providing access to the Summons, Complaint, all exhibits thereto, and any Order entered by this Court authorizing such service.
9. Attached as **Exhibit "1"** is a diagram illustrating the proposed method of service.
10. The proposed method of service is reasonably calculated under the circumstances to provide actual notice to Defendants because the identified wallet addresses were actively utilized by Defendants in carrying out the exploit, receiving stolen assets, transferring such assets, and maintaining control over assets traceable to the exploit.

11. The proposed method of service is the most reasonably calculated means presently available to notify Defendants of this action and is the only viable means of service currently available despite Plaintiff's exercise of due diligence.

12. Because no Defendant has yet been served, this Motion is properly submitted ex parte.

13. Plaintiff respectfully submits that authorizing service through the identified blockchain wallet addresses is consistent with principles of due process because it is reasonably calculated to provide notice to Defendants and an opportunity to be heard.

WHEREFORE, Plaintiff respectfully requests that this Court: Enter an Order authorizing service of process upon Defendants DOE NOS. 1–25 through the blockchain-based service method described herein; Authorize service through the identified Sui and Ethereum wallet addresses and any additional wallet addresses determined through Plaintiff's continuing investigation to be under Defendants' possession, custody, or control; Direct that upon completion of such service, Defendants shall file a response to the Complaint within twenty (20) days; and Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

By: /s/Jose Teurbe-Tolon

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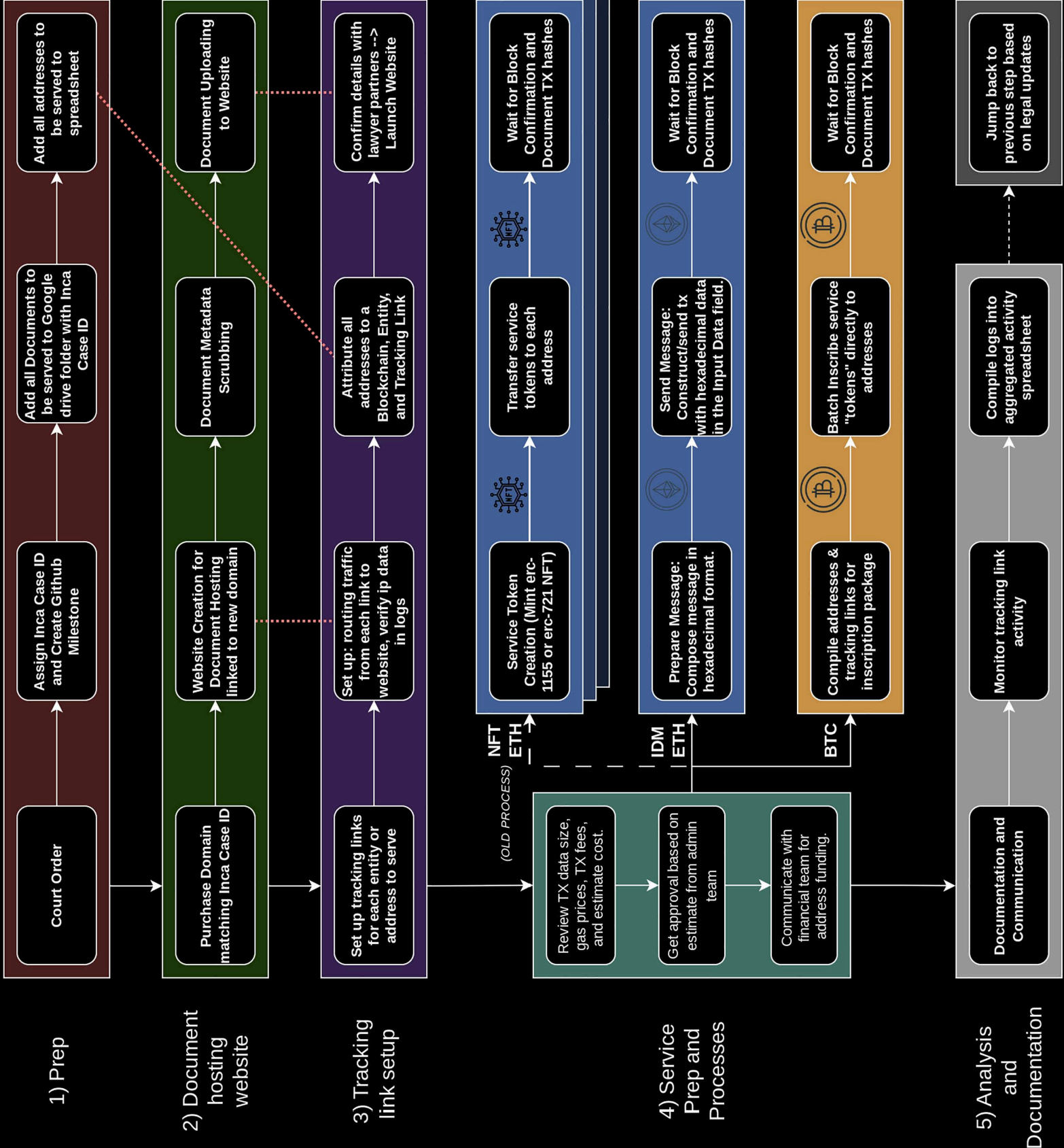


EXHIBIT 1