

1 SHAUN P. MARTIN (SBN 158480)  
5998 Alcala Park, Warren Hall  
2 San Diego, CA 92110  
T: (619) 260-2347 | F: (619) 260-7933  
3 smartin@sandiego.edu

4 *Counsel for Plaintiff Howard Mann*

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES**  
10

11 HOWARD MANN, on behalf of himself and  
12 all others similarly situated,

13 Plaintiff,

14 v.

15 SEAN MOORE, MIRANDA GOMEZ, and  
DOES 1 through 200, inclusive,

16 Defendants.  
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Case No. 24STCV17012

**[PROPOSED] ORDER TO SHOW CAUSE  
FOR PRELIMINARY INJUNCTION AND  
TEMPORARY RESTRAINING ORDER**

Judge: Hon. William F. Highberger  
Place: 312 N. Spring Street  
Los Angeles, CA 90012, Dept. 10

1 **ORDER TO SHOW CAUSE**

2 Based upon the Verified Complaint in this action, *Ex Parte* Application of Plaintiff Howard  
3 Mann for Temporary Restraining Order and Order to Show Cause regarding Preliminary Injunction,  
4 Plaintiff's Memorandum of Points and Authorities in support of *Ex Parte* Application for Temporary  
5 Restraining Order and Order to Show Cause regarding Preliminary Injunction, the Declarations of  
6 Plaintiff Howard Mann, Charles Zach, and Shaun Martin in support of *Ex Parte* Application for  
7 Temporary Restraining Order and Order to Show Cause regarding Preliminary Injunction, and upon  
8 sufficient cause being shown:

9 **IT IS HEREBY ORDERED** that Defendant SEAN MOORE; Defendant MIRANDA  
10 GOMEZ; Binance Holdings Ltd.; and Mek Global Limited, Phoenix, Fin PTE Ltd., Flashdot Limited,  
11 and Peken Global Limited (herein after, "KuCoin"), and/or any of their agents, servants, employees,  
12 attorneys, affiliates, partners, successors, assigns, subsidiaries, or any other persons through which  
13 they act, or who act in active concert or participation with any of them (collectively, the "Enjoined  
14 Parties"), appear before this Court on \_\_\_\_\_ at \_\_\_\_\_  
15 a.m./p.m.in Department 10, 312 N. Spring St, Los Angeles, California 90012, to show cause why a  
16 preliminary injunction should not be ordered restraining the Enjoined Parties as set forth in the  
17 Temporary Restraining Order.

18 **IT IS FURTHER ORDERED** that:

19 Plaintiff shall serve a copy of this Order to Show Cause for Preliminary Injunction and  
20 Temporary Restraining Order and all supporting documents, as well as the Verified Complaint, within  
21 five days of the issuance of the Temporary Restraining Order on the Enjoined Parties, including the  
22 owners of each of the wallets identified in Appendix A of this Order through a special purpose token  
23 or similar device delivered or airdropped into each the wallets identified in Appendix A of this Order,  
24 and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff's counsel  
25 that will include both this Order and all papers upon which it is based. The hyperlink will include a  
26 mechanism to track when a person clicks on the hyperlink. This process shall constitute actual notice  
27

1 of this Order and sufficient service on the person or persons controlling the corresponding wallet  
2 addresses identified in Appendix A of this Order.

3 Proof of such service shall be filed with the Court no later than \_\_\_\_\_ days before the hearing  
4 on Plaintiff Howard Mann's Order to Show Cause.

5 Any opposing papers shall be filed with the Court and served upon Plaintiff Howard Mann by  
6 the Enjoined Parties no later than \_\_\_\_\_ days before such hearing date.

7 Any reply papers shall be filed with the Court and served on the Enjoined Parties by Plaintiff  
8 Howard Mann no later than \_\_\_\_\_ days before such hearing date.

9 The Enjoined Parties are hereby on notice that failure to timely serve and file an opposition, or  
10 failure to appear at the hearing, may result in the imposition of a preliminary injunction against them  
11 pursuant to Section 527 of the California Code of Civil Procedure.

12 **TEMPORARY RESTRAINING ORDER**

13 IT IS HEREBY ORDERED that, pending the hearing on Plaintiff Howard Mann's application  
14 for a preliminary injunction:

15 (1) Defendant SEAN MOORE; Defendant MIRANDA GOMEZ; Binance Holdings Ltd.; and  
16 Mek Global Limited, Phoenix, Fin PTE Ltd., Flashdot Limited, and Peken Global Limited (herein  
17 after, "KuCoin"), and/or any of their agents, servants, employees, attorneys, affiliates, partners,  
18 successors, assigns, subsidiaries, or any other persons through which they act, or who act in active  
19 concert or participation with any of them, who receive actual notice of this Order through personal  
20 service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or  
21 other device, or any of them [(collectively, the "Enjoined Parties")], are hereby temporarily restrained  
22 from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency  
23 or assets held in the wallets identified in Appendix A of this Order, whether such property is located  
24 inside or outside of the United States of America.

1 (2) Plaintiff's attorneys shall cause a copy of this Temporary Restraining Order, together with  
2 a copy of the papers upon which it is based, as well as the Verified Complaint and the summons in  
3 this action, to be served upon the person or persons controlling the wallets identified in Appendix A  
4 of this Order via a special purpose token or similar device delivered into each of the wallets identified  
5 in Appendix A of this Order, and each of these service tokens will contain a hyperlink to a website  
6 maintained by Plaintiff's counsel that will include both this Order and all papers upon which it is  
7 based. The hyperlink will include a mechanism to track when a person clicks on the hyperlink. This  
8 process shall constitute actual notice of this Order and sufficient service of process on Defendants and  
9 the person or persons controlling the corresponding wallet addresses identified in Appendix A of this  
10 Order.

11 (3) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees,  
12 attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which  
13 they act, or who act in active concert or participation with any of them, who receive actual notice of  
14 this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of  
15 receiving actual notice of this Order to provide notice of the same to any of their customers associated  
16 with any of the wallet addresses identified in Appendix A of this Order, including SEAN MOORE  
17 and DEFENDANT Miranda Gomez, and provide counsel for Plaintiff a copy of such notice.

18 **IT IS FURTHER ORDERED** that:

19 This Temporary Restraining Order shall expire on \_\_\_\_\_ unless extended  
20 by the Court.

21 The Enjoined Parties are further notified of their right to apply to this Court for modification  
22 or dissolution of this Temporary Restraining Order, if appropriate and supported by a showing of good  
23 cause, on notice or such shorter notice as this Court may allow.

24 Notice was not provided to Defendant prior to issuance of this Order either because their  
25 identities have not yet been ascertained or because this Court has determined that providing such notice  
26 would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation  
27 of the assets listed in Appendix A of this Order.

1 Pursuant to California Code of Civil Procedure § 527, this Court in its discretion determines  
2 that no bond is required.

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4 **IT IS SO ORDERED.**

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6 DATED: \_\_\_\_\_

By: \_\_\_\_\_  
Judge of the Superior Court

## APPENDIX A

### Binance

15PGbkbXoVSQXWTHXwrcJPevq8NV5Ffdho

1A2PWvYo8EmysLFbYL99gGHK3haqRo9fiN

13GJh5kyqfgtsb5GP6VqH2fvAEQLPzPp5X

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166r3x91TfWh8D27Ej2QkcUT3qTyHPLJmZ

1MoYksuZoQwpvrGUAkXYtrwrrPK9ByG4Tj

1CGbRD4qfFjkQpNggKF3EJzj9wJhSatWt2

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1FQqrmfVoVQuUQEMAZsXkHeT4nkYja4gm

1Ntq5herKqrKa3iGUA9rQvcVwB3VAEKCNJ

12QAqsBQUQXwniXA21gRrASbpokjdvhz15

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1CGbRD4qfFjkQpNggKF3EJzj9wJhSatWt2

1DF2tninBnokz9L4Tb61U8Pv8zc3Rggg8P

1EyKJN6JT xvQergHhcJUWyYzgcdhZ1Lqeo

### KuCoin

3L5HM9PvUqu9YwKgNLVyLggCZ84sCp8KWZ