

MAY 20 2026

BY **B. PUEBLA**

DEPUTY

1 Dimitri Nichols, Esq. (SBN 242098)
2 **THE GORI LAW FIRM, P.C.**
3 3848 W. Carson Street, Suite 350
4 Torrance, CA 90503
5 Telephone: (424) 383-1501
6 Facsimile: (424) 383-1504
7 E-mail: californiaservice@gorilaw.com

8 Samuel D. Elswick, Esq. (FL SBN 0105108)
9 (Pro Hac Vice Application Pending)
10 **THE GORI LAW FIRM, P.C.**
11 37 N. Orange Ave., Ste. 226
12 Orlando, FL 32801
13 Phone (321) 430-0864 | Fax (321) 234-0336
14 Email: selswick@gorilaw.com

15 Attorneys for: PLAINTIFF

16
17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF YOLO**
19

<p>20 BRIAN M. SAMUELS, on behalf of himself 21 and others similarly situated,</p> <p>22 23 PLAINTIFF,</p> <p>24 v.</p> <p>25 JOHN DOE NOS. 1-25,</p> <p>26 27 Defendants.</p>	<p>20 YOLO CASE NO. CV2026-1200</p> <p>21 22 PROPOSED ORDER GRANTING EX 23 PARTE APPLICATION FOR ORDER TO 24 SHOW CAUSE FOR PRELIMINARY 25 INJUNCTION AND TEMORARY 26 RESTRAINING ORDER</p> <p>27 Date: May 21, 2026 28 Time: 9:00 a.m. Dept.:14</p>
--	---

22 The Court, having considered Plaintiff Brian M. Samuels' Application for Temporary
23 Restraining Order, the Declaration of Brian M. Samuels, Declaration Maya Vick, Verified
24 Complaint and the supporting evidence submitted in connection with the application, and the record
25 in this matter, and good cause appearing, finds as follows.

26 1. Plaintiff Brian M. Samuels is a resident of El Macero, California. Plaintiff has filed
27 a Verified Complaint on behalf of himself and all others similarly situated alleging that Defendants
28 stole cryptocurrency through a "pig butchering" scheme in which the victims were persuaded to

FILED BY FAX

1 deposit cryptocurrency assets in fake “investment platforms” hosted by Defendants.

2 2. Plaintiff and his counsel retained Inca Digital (“Inca”), an experienced digital
3 investigation team, to track and trace the cryptocurrency funds stolen from Plaintiff and those
4 similarly situated. As explained more fully in Plaintiff’s *Ex Parte* Application, Memorandum of
5 Points and Authorities, and Declaration of Maya Vick, Inca traced these funds to the seventy-seven
6 (77) identified cryptocurrency wallets contained in Appendix A to this Order.

7 3. Plaintiff’s Verified Complaint adequately alleges that Defendants have utilized
8 false identities in order to steal the cryptocurrency assets at issue herein, and that their true
9 identities and locations are presently unknown and unknowable to Plaintiff and his counsel.
10 Plaintiff is informed and believes that many of these individuals are located outside the United
11 States, as is common in cryptocurrency theft cases.

12 4. Entry of a temporary restraining order without prior notice to Defendants is
13 appropriate given the nature of the cryptocurrency theft at issue, the alleged use of fictitious
14 identities by the Defendants, and the fact that the cryptocurrency assets at issue may be instantly
15 transferred to locations beyond the reach of this Court were Defendants notified in advance of
16 the potential seizure of this cryptocurrency. *See Jacobo v. Doe*, 2022 U.S. Dist. LEXIS 101504,
17 *9 (E.D. Cal. June 7, 2022) (finding that “[i]f defendant were provided notice of this action, ‘it
18 would be a simple matter for [him] to transfer [the cryptocurrency] to unidentified recipients
19 outside the traditional banking system, including contacts in foreign countries, and effectively
20 put it beyond the reach of this Court”).

21 5. Plaintiff proposes a method of service of this order to show cause (“OSC”), the
22 summons and complaint, and all other papers and Orders of this Court in this matter that is best
23 available manner under the circumstances of this case and reasonably calculated to lead to actual
24 notice to the Defendants. Traditional methods of service are unavailable given Defendants’ use
25 of fictitious identities and unknown locations. The seizure of Defendants’ cryptocurrency wallets
26 and the delivery of special purpose token or similar device into those wallets pursuant to this
27 Order will effectively notify Defendants of the pendency of this action and the manner in which
28 they may object to the temporary restraining order (“TRO”) and/or requested preliminary

1 injunction if they wish.

2 6. Plaintiff’s counsel has advised this Court that similar TROs and notice procedures
3 have been issued in similar cryptocurrency theft cases in which they have been involved in courts
4 in California, New York, Florida, Alabama, and Michigan and that, in these matters, defendants
5 have on occasion responded to these seizures by contacting plaintiffs’ counsel and/or the Court,
6 thereby demonstrating that notice was in fact effectively received by Defendants, but that none of
7 these Defendants elected to appear at the scheduled preliminary injunction hearing due to the
8 illegality of their alleged cryptocurrency theft and corresponding need to state their true identities
9 were they to appear in court. *See also Blum v. Defendant*, 2023 U.S. Dist. LEXIS 235592, at *4-5
10 (N.D. Fla. Dec. 13, 2023 (granting similar *ex parte* TRO and holding that plaintiff’s “cryptocurrency
11 assets are specific, identifiable property that can be traced to Defendants’ Destination Addresses”).

12 7. Sufficient service will also be effected because the Order directs that the exchanges
13 in which these cryptocurrency wallets are held (Binance Holdings, OKX, Gate.io, Kraken and
14 KuCoin) provide separate notice of this Order to the customers of each of the cryptocurrency wallets
15 identified in Appendix A.

16 8. Plaintiff has demonstrated good cause for expedited discovery directed to the non-
17 party cryptocurrency exchanges Binance, OKX, Gate.io, Kraken, and KuCoin to obtain records
18 sufficient to identify the account holders associated with the wallet addresses listed in Appendix A
19 to this Order, including customer identification and know-your-customer (“KYC”) documentation,
20 associated accounts or wallet addresses controlled by the same user, transaction records reflecting
21 transfers to or from the identified wallets, and related account access information such as IP logs
22 and login history, for the purpose of identifying Defendants and tracing the flow of misappropriated
23 cryptocurrency.

24 Based upon the Verified Complaint in this action, the *ex parte* applications of Plaintiff
25 and supporting declarations, and upon sufficient cause being shown, this Court grants Plaintiff
26 Brian Samuels *Ex Parte* Application and Orders as follows:

27 ///

28 ///

1 **ORDER TO SHOW CAUSE**

2 **IT IS HEREBY ORDERED** that Defendants, John Doe Nos. 1-25, and non-party
3 exchanges Binance Holdings, OKX, Gate.io, Kraken and KuCoin, and/or any of their agents,
4 servants, employees, attorneys, affiliates, partners, successors, assigns, subsidiaries, or any other
5 persons through which they act, or who act in active concert or participation with any of them
6 (collectively, the “Enjoined Parties”), appear before this Court on **April _____, 2026 at _____ a.m.**
7 **in Department _____**, 1000 Main St., Woodland, California, to show cause why a preliminary
8 injunction should not be ordered.

9 **IT IS FURTHER ORDERED** that:

10 Plaintiff shall serve a copy of this Order to Show Cause for Preliminary Injunction and
11 Temporary Restraining Order, and all supporting documents filed in connection therewith, as
12 well as the Verified Complaint, summons, and all other Orders of the Court in this matter, within
13 five days of the issuance of the Temporary Restraining Order on the Enjoined Parties, including
14 the owners of each of the wallets identified in Appendix A of this Order through a special
15 purpose token or similar device delivered into each the wallets identified in Appendix A of this
16 Order. Each of these service tokens shall contain a hyperlink to a website maintained by
17 Plaintiff’s counsel that will include this Order and all papers upon which it is based, the Verified
18 Complaint and summons, and a hyperlink that includes a mechanism to track when a person
19 clicks on the hyperlink. This process shall constitute actual notice of this Order and sufficient
20 service of process on Defendants and the person or persons controlling the corresponding wallet
21 addresses identified in Appendix A of this Order.

22 Plaintiff shall file proof of such service with the Court no later than _____, **2026**. Any
23 papers opposing the OSC or preliminary injunction shall be filed with the Court and served upon
24 Plaintiff by the Enjoined Parties no later than _____, **2026**. Reply papers by Plaintiff, if any,
25 shall be filed with the Court and served on the Enjoined Parties no later than _____, **2026**.

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

1 restraining the Enjoined Parties as set forth in the Temporary Restraining Order.

2 **TEMPORARY RESTRAINING ORDER**

3 **IT IS HEREBY ORDERED** that, pending the hearing on Plaintiff’s application for a
4 preliminary injunction:

5 Defendants John Doe Nos. 1-25, and non-party exchanges, Binance Holdings, OKX,
6 Gate.io, Kraken and KuCoin, and/or any of their agents, servants, employees, attorneys, affiliates,
7 partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act
8 in active concert or participation with any of them, and any individual or entity who receives actual
9 notice of this Order through personal service or otherwise, whether acting directly or through any
10 trust, corporation, subsidiary, division or other device, or any of them [(collectively, the “Enjoined
11 Parties”)], are hereby temporarily restrained from withdrawing, transferring, selling, encumbering,
12 or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Appendix
13 A of this Order, whether such property is located inside or outside of the United States of America:

14 Plaintiff’s attorneys shall cause a copy of this Temporary Restraining Order, together with a
15 copy of the papers upon which it is based, as well as the Verified Complaint and the summons in
16 this action, to be served upon the person or persons controlling the wallets identified in Appendix
17 A of this Order via a special purpose token or similar device delivered into each of the wallets
18 identified in Appendix A of this Order, and each of these service tokens will contain a hyperlink to
19 a website maintained by Plaintiff’s counsel that will include both this Order and all papers upon
20 which it is based. The hyperlink will include a mechanism to track when a person clicks on the
21 hyperlink. This process shall constitute actual notice of this Order and sufficient service of process
22 on Defendants and the person or persons controlling the corresponding wallet addresses identified
23 in Appendix A of this Order.

24 Binance Holdings, OKX, Gate.io, Kraken and KuCoin, and/or any of their agents, servants,
25 employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons
26 through which they act, or who act in active concert or participation with any of them, who receive
27 actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four
28 (24) hours of receiving actual notice of this Order to provide notice of the same to any of their

1 customers associated with any of the wallet addresses identified in Appendix A of this Order,
2 including Defendants John Doe Nos. 1-25 and provide counsel for Plaintiff a copy of such notice.

3 Plaintiff may serve expedited discovery on the non-party cryptocurrency exchanges
4 Binance, OKX, Gate.io, Kraken, and KuCoin seeking records sufficient to identify the account
5 holders associated with the wallet addresses listed in Appendix A to this Order, including customer
6 identification and know-your-customer (“KYC”) documentation, associated accounts or wallet
7 addresses controlled by the same user, transaction records reflecting transfers to or from the
8 identified wallets, and related account access information such as IP logs and login history, for the
9 purpose of identifying Defendants and tracing the flow of misappropriated cryptocurrency.

10 **IT IS FURTHER ORDERED** that:

11 This Temporary Restraining Order shall expire on _____, **2026 at __:00 p.m.** Pacific
12 Daylight Time unless extended by the Court.

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

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

18
19 **IT IS SO ORDERED.**

20
21 **DATED:** _____

_____ **Judge of the Superior Court**

1 **APPENDIX A**

2

3 **Binance (42)**

4 THNttSkLDWZ2vjJ7TC6JvuFRdwNaA3dP8F

5 TNsYvCGbmQaoF7PYkYpQbGEc4qaBN4JSrY

6 TJqr63cMVWRveDePA5Hufbdro9Gbua2rty

7 TKhpHGDRXrhnuFCphzAHj37pd641wh3hyw

8 TF7wMYNphv8J6spRCnV9Y5zq6eSWdJngk9

9 TRLqkZKGEznV1J1ZYMmTJFTXie5uR74auR

10 TTg1u2hbKtgkZcfh8uHHG4qcCE892Vfn3C

11 TPa13azfzWevjTtqV6hQasSmygVk5gGbwd

12 TTH7TAt5iooLXSHAq9oX3V3TwB9P1uzPig

13 TBKYANtrr6AuncVbNNB7mz1D2XgYGa2Wpn

14 TC4gQS3iHQsxsxYCPAatNYt58CbZSFdXNA

15 TFUC1JFqeeEpW4NMcmbgEmE94HY1fdtUSp

16 TUpXKjk8P22DxCWFEnpyD4HCuqZJtvZFye

17 THjVQp8ySUJTtWGrMf9hpidnRQLmS8SBcR

18 TSuQjLyvcM2sPAAtM9Xo87UCcukGMKUpGn3

19 TAwgMvibaKerEupQVhRiRGHvmYgfQ4us9sv

20 THNttSkLDWZ2vjJ7TC6JvuFRdwNaA3dP8F

21 TXLujcy8oURHZkoVhdkGWorB3cqZqSj9bb

22 TJzquiiNesTr7iUE9ToeEddccLB1tisT2P

23 TShRoVDD8nxTpMMB53XjC7SZU4Y3joGubc

24 TTTQnjdc9GG9EjuP4jYHzx7wtpGXaqN1ti

25 TQrBaHHmmLXmAgMjGKxt5MChVKFbeqw2CJ

26 TYfVaiGaV7tSYyHy1txeYomVyU1t7nsxTF

27 TQrBaHHmmLXmAgMjGKxt5MChVKFbeqw2CJ

28 TC3zMkEtSk4aedh385aCVG1XostumUsWoW

1 TUJBiR24MWGXnBcHEaBCLQzYUEUhxKY8PP
2 TBfTVVJUd834av9nHux4j3wAYMdjQ9NgRj
3 TJwvvoor77dxnaHB3uEwDzLY6CeUxUaRUC
4 TSVK6bcrM94uvXMF9ieQ6XbgLc6fGJq3Ca
5 TK6GJDBbDwvnb1JPp2Y1pX6A54R5bdkVuP
6 TUoqzipR9ghYLwu3Qkzd3AXyUucU3Dq9
7 TATPwcimMZmJctvQPXAY9QCaPdfxXqEBXs
8 TFYDfwq4KwNdQDQEjeVcwu9EZkuRghaSAS
9 TEJLuKgWYdS9cyjFYQpCodC2TyRPHGn2Sz
10 TJRncdeGcJqtUidKU7F6NHC8Pc9cj1mbs1
11 TLmNyFS88swiMAskucJhndDGZpZDN3bpwc
12 TTjCyPXjLBox5nsx1v4XXmpUVxSc4Ti7JE
13 TYegccZnMMtpYcNFQMfh79hyxbB4HGzPu5
14 TU6Eun751wDs9BRGXrJYYCqxxZspkpUnkf
15 TKst1Uiy8uy9ud9t3FXxrsjLoWPkH9rzeA
16 TUSa7RW3a4toySugQjyJyRXjQYkJCqA8us
17 TJSumRVVzDXRp7mMrfbSaAjj9iwmySnyA4

18 **OKX (24)**

19 TTMJLdJR7BTBSgfHL3ENvn4hut552a364G
20 TFnihNhC2H2sEyn2Dw75dJBy7jykcKbZei
21 THVHyp4TxyWbFeSmjJT4DmCcGxzsMVw1MC
22 TBoU8qmj8LhuiKStN2JUDEYXWBz94e6G1P
23 TYyfkAw8HCUhiQMbiU5v4FEquNGf659kdF
24 TWn1zcLGck67VfweGVVyUtWQK8hTtghPSr
25 TGEasWGn2MoUXHuj4RNkNZeb8vK7SKkiCn
26 TGrrVrAyC1GaPpwEiStdzrs7Wz6Pougiw
27 TGEasWGn2MoUXHuj4RNkNZeb8vK7SKkiCn
28 TRXPRc6bhiAW6n38BFYStKJqYX1EbCnLF2

1 TU6SvAziDNnDD6j8ZRK4fiHiN9xcZGXJ4b
2 TJ3HHjCW4G5sr9ec3iWmEd1Ct61WqAi8QA
3 TTcCKqhh3qmWkCh16WddkwMv8tRPEb1BKw
4 TXwAR9nVF36JUFHrxHvj42f69uCDhGaZF1
5 TTKkmbWQqBpcP7riBhBuoPug87aPw3gEAL
6 TWwaSWH4EVyUU7ab8zgr8MSnKGJwHiakS3
7 TEGimixjnuHzd2XoYBiAuxXPvKdd2A1ksA
8 TVkxpYbrZbZUmyYapspvxfhZC8XEm5gWi
9 TSFndv7vEm1ETECfZXStUSx5GrmPZr4UBx
10 TKJrFQFT7a5NwVERhfNqvfaEZAcNPKzSD
11 TNc8j9NdXS5mcickNeMW9dxxCiwn9NWR7P
12 TY86SnUpBfghkYotPe8qHqKtrYCzcwRwnP
13 TEe9pPd8oFpeimJJYugwTQzjs5JDy7869G
14 TATAK8z5WJXSqeoNSj7iuNTyVgDiPKL1uy

15 **Gate.io (11)**

16 TWS4FhKA1wGZJvDfMavTqUsMutTRhSu4Ek
17 TH65psJRGgztAE42dNSrW7aMWxb652bZtE
18 TAZcARfKQug3Hx4ZfRqwyfsq5MKmQ8PH1e
19 TLmys3Frztnrg3Gjtw3zduQMKjH8xr8cVr
20 TD8B7MpeV97WCtwojTkCzcgCAmyc6HMZCZ
21 TUcxVJkqpV6bV4zi3uePMJbJ3QspdLmgvv
22 TLmys3Frztnrg3Gjtw3zduQMKjH8xr8cVr
23 TKw6T6rFTno7SbVjvdJCGKZfub5t83i2WS
24 TM3XbAxCqojR12xYQNUycDjXrCTi1rMWyk
25 TXoBA7cgrCGJxGUHUoSHbLYF8hkngtAaHE
26 TYf6oi8SAjerRSGs1nCTYhw4jGWjqkpBeX

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Kraken (2)

TCcsLwUi7M12MQddQbyZ2XSqY1ZYhn49JY

TLsH1CGwKbe4WrrJ2T7BGyaWhxaeuFHqz4

KuCoin (1)

TSDYHbXRkYyMqsifvGSoUZXPf4A62AiqGA