

ELECTRONICALLY FILED
by Superior Court of CA,
County of Yolo,
on 4/7/2026 3:15 PM
By: L. Mendoza, 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, 22 23 PLAINTIFF, 24 25 v. 26 JOHN DOE NOS. 1-25, 27 28 Defendants.</p>	<p>YOLO CASE NO. CV2026-1200 DECLARATION OF DIMITRI NICHOLS IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION FOR TEMORARY RESTRAININNG ORDER AND OSC RE: PRELIMINARY INJUNCTION</p>
---	--

29 I, Dimitri Nichols, declare under penalty of perjury under the laws of the State of California
30 that the foregoing is true and correct.

31 1. My name is Dimitri Nichols. I am over 18 years of age, of sound mind, and competent
32 to make this Declaration. I am counsel for Plaintiff in this action. The facts set forth in this
33 Declaration are based upon my personal knowledge unless otherwise stated, and if called as a
34 witness, I could and would competently testify to them.

35 2. Plaintiff has not previously requested any provisional relief in this action and has

1 exercised due diligence in investigating and prosecuting this matter. This investigation has included,
2 among other things, the extensive tracing and identification of the cryptocurrency wallets identified
3 in the Proposed Order and in the supporting documents filed in connection with the present request
4 for provisional relief.

5 3. Counsel for Plaintiff is willing and able to prepare and deliver the notice described
6 in the Proposed Order.

7 4. Despite substantial investigation, Plaintiff has been unable to discover the true
8 identities or locations of the Defendants due to their use of fictitious identities and deliberate efforts
9 to conceal their identities. Accordingly, the method of service proposed in the Proposed Order
10 represents the best available means to provide actual notice of this action and of the provisional
11 relief requested.

12 5. Because Defendants' identities and locations are unknown, Plaintiff cannot
13 effectively file a noticed motion. There is no address or identifiable location at which Defendants
14 may be served with such a motion as required by California Code of Civil Procedure § 1005, which
15 contemplates service by mail or other conventional means upon Defendants or their counsel.

16 6. Courts addressing similar cryptocurrency theft cases have permitted ex parte relief
17 where advance notice cannot reasonably be provided because defendants operate anonymously
18 through blockchain wallet infrastructure. In such cases, courts have authorized seizure or restraint
19 of cryptocurrency assets and then permitted plaintiffs to provide notice by depositing an electronic
20 "token" or similar blockchain message into the affected wallets, thereby notifying the persons
21 controlling those wallets of the lawsuit and their opportunity to appear and contest the seizure. In
22 this matter, Plaintiff proposes to deliver a special-purpose notification token or similar device
23 directly into each of the wallet addresses identified in Appendix A of the proposed Order. Each
24 notification token will contain a hyperlink to a website maintained by Plaintiff's counsel where
25 Defendants may access the Order and all papers upon which it is based. The hyperlink will include
26 a mechanism that records when the link is accessed. This is the notice procedure proposed in
27 Plaintiff's ex parte application. At present, there is no practical mechanism for providing comparable
28 electronic notice to the persons controlling these wallets before the assets are restrained and the

1 notification token can be delivered.

2 7. Providing advance notice of the requested relief would also defeat the purpose of the
3 requested injunction. If Defendants were alerted that the identified cryptocurrency wallets were the
4 subject of a seizure request, they could transfer the assets out of those wallets within seconds,
5 moving them through additional wallets or offshore exchanges where recovery would become
6 significantly more difficult or impossible. The rapid movement of stolen cryptocurrency following
7 notice of enforcement action is a well-recognized feature of cryptocurrency theft schemes.

8 8. Absent immediate ex parte relief, there is a substantial risk that Defendants will
9 transfer, dissipate, or conceal the cryptocurrency assets identified in Plaintiff's application before
10 the Court can hold a hearing on noticed relief, which would cause immediate and irreparable harm
11 to Plaintiff.

12 9. California courts have authorized temporary restraining orders freezing or seizing
13 cryptocurrency assets without prior notice to defendants in comparable cryptocurrency seizure
14 cases. See, e.g., *Jacobo v. Doe*, 2022 U.S. Dist. LEXIS 101504, at *9 (E.D. Cal. June 7, 2022);
15 *Younes v. Taylor and Does Nos. 1–25*, Case No. 24STCV12520 (Sup. Ct. Los Angeles, CA, June
16 27, 2024) [attached as Exhibit A]; *Mann v. Sean Moore, et al.*, Case No. 24STCV17012 (Sup. Ct.
17 Los Angeles, CA, July 17, 2024) [attached as Exhibit B].

18 10. Likewise, courts across the country have granted similar ex parte relief in comparable
19 cryptocurrency theft cases. See, e.g., *Pouyafar v. Doe Nos. 1–25*, Index No. 654820/2023 (Sup. Ct.
20 N.Y. Sept. 29, 2023); *Shaya v. Nofs et al.*, Case No. 24-cv-10670 (E.D. Mich. Mar. 18, 2024);
21 *Dollma v. Walter et al.*, Case No. 11-2024-CA-000641-0001 (Collier Cty., Fla. Apr. 1, 2024); and
22 *Mashkevich v. Ava et al.*, No. 50-CV-2024-900163.00 (Marshall Cty., Ala. Jun. 4, 2024).

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct.

25 Executed this 6th day of April 2026, in Los Angeles, California.

26 
27 _____
28 Dimitri Nichols

EXHIBIT A

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

William A. Delgado (SBN 222666)
wdelgado@dtolaw.com
Marisol Ramirez (SBN 307069)
mramirez@dtolaw.com
DTO LAW
601 South Figueroa Street, Ste. 2130
Los Angeles, CA 90017
Telephone: (213) 335-6999
Facsimile: (213) 335-7802

SHAUN P. MARTIN (SBN 158480)
smartin@sandiego.edu
5998 Alcala Park, Warren Hall
San Diego, CA 92110
Telephone: (619) 260-2347
Facsimile: (619) 260-7933

Attorneys for Plaintiff
YOUNES YOUNES

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

YOUNES YOUNES, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

ELVIRA TAYLOR and DOES 1 through 200,
inclusive,

Defendants.

FILED
Superior Court of California
County of Los Angeles
06/27/2024
David W. Slayton, Executive Officer / Clerk of Court
By: M. Fregoso Deputy

Case No.: 24STCV12520

Hon. Elihu Berle

**[PROPOSED] ORDER GRANTING EX
PARTE APPLICATION FOR
RECONSIDERATION AND GRANTING
ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING ORDER**

Judge: The Hon. Elihu Berle
Place: 312 N. Spring Street,
Los Angeles, CA 90012
Dept. 6

1 This matter came for hearing on an *ex parte* application in Department 6 at 8:30 a.m. on
2 June 26, 2024.

3 This Court finds as follows:

4 1. Plaintiff has filed a Verified Complaint on behalf of himself and all others
5 similarly situated alleging that Defendants stole cryptocurrency through a “pig butchering”
6 scheme in which the victims were persuaded to deposit these cryptocurrency assets in a fake
7 “work platform” hosted by Defendants.

8 2. Plaintiff and his counsel retained Inca Digital (“Inca”), an experienced digital
9 investigation team, to track and trace the cryptocurrency funds stolen from Plaintiff and those
10 similarly situated. As explained more fully in Plaintiff’s *ex parte* application, Inca traced these
11 funds to the fifteen (15) identified cryptocurrency wallets contained in Appendix A to this Order.

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

17 4. Entry of a temporary restraining order without prior notice to Defendants is
18 appropriate given the nature of the cryptocurrency theft at issue, the alleged use of fictitious
19 identities by the Defendants, and the fact that the cryptocurrency assets at issue may be instantly
20 transferred to locations beyond the reach of this Court were Defendants notified in advance of
21 the potential seizure of this cryptocurrency. *See Jacobo v. Doe*, 2002 U.S. Dist. LEXIS 101504,
22 *9 (E.D. Cal. June 7, 2022) (finding that “[i]f defendant were provided notice of this action, ‘it
23 would be a simple matter for [him] to transfer [the cryptocurrency] to unidentified recipients
24 outside the traditional banking system, including contacts in foreign countries, and effectively
25 put it beyond the reach of this Court”).

26 5. Plaintiff proposes a method of service of this order to show cause (“OSC”), the
27 summons and complaint, and all other papers and Orders of this Court in this matter that is best
28

1 available manner under the circumstances of this case and reasonably calculated to lead to actual
2 notice to the Defendants. Traditional methods of service are unavailable given Defendants' use
3 of fictitious identities and unknown locations. The seizure of Defendants' cryptocurrency wallets
4 and the delivery of special purpose token or similar device into those wallets pursuant to this
5 Order will effectively notify Defendants of the pendency of this action and the manner in which
6 they may object to the temporary restraining order ("TRO") and/or requested preliminary
7 injunction if they wish. Plaintiff's counsel has advised this Court that similar TROs and notice
8 procedures have been issued in similar cryptocurrency theft cases in which they have been
9 involved in courts in New York, Florida, Alabama, and Michigan and that, in these matters,
10 defendants have on occasion responded to these seizures by contacting plaintiffs' counsel and/or
11 the Court, thereby demonstrating that notice was in fact effectively received by Defendants, but
12 that none of these Defendants elected to appear at the scheduled preliminary injunction hearing
13 due to the illegality of their alleged cryptocurrency theft and corresponding need to state their
14 true identities were they to appear in court. *See also Blum v. Defendant*, 2023 U.S. Dist. LEXIS
15 235592, at *4-5 (N.D. Fla. Dec. 13, 2023 (granting similar *ex parte* TRO and holding that
16 plaintiff's "cryptocurrency assets are specific, identifiable property that can be traced to
17 Defendants' Destination Addresses"). Sufficient service will also be effected because the Order
18 directs that the exchanges in which these cryptocurrency wallets are held (Binance Holdings and
19 OK Group) provide separate notice of this Order to the customers of each of the cryptocurrency
20 wallets identified in Appendix A.

21 6. Based upon the contents of the Verified Complaint in this matter and the sworn
22 declarations submitted in connection with Plaintiff's *ex parte* applications, the public interest
23 would be served by the requested issuance of a TRO and OSC, and Plaintiff would suffer
24 irreparable harm absent their issuance. *See Jacobo, supra* at *15-16 ("[C]ourts have found that
25 the risk of irreparable harm to be likely in matters concerning fraudulent transfers of
26 cryptocurrency due to the risk of anonymous and speedy asset dissipation.").

1 Based upon the Verified Complaint in this action, the *ex parte* applications of Plaintiff
2 and supporting declarations, and upon sufficient cause being shown, this Court grants Plaintiff
3 Younes Younes' *Ex Parte* Application of for Reconsideration of Minute Order of June 14, 2024
4 and Orders as follows:

5 **ORDER TO SHOW CAUSE**

6
7 **IT IS HEREBY ORDERED** that Defendant ELVIRA TAYLOR, Binance Holdings
8 Ltd., and OK Group, and/or any of their agents, servants, employees, attorneys, affiliates,
9 partners, successors, assigns, subsidiaries, or any other persons through which they act, or who
10 act in active concert or participation with any of them (collectively, the "Enjoined Parties"),
11 appear before this Court on July 18, 2024 at 10:00 a.m. in Department 6, 312 N Spring St, Los
12 Angeles, CA 90012, to show cause why a preliminary injunction should not be ordered
13 restraining the Enjoined Parties as set forth in the Temporary Restraining Order.

14
15 **IT IS FURTHER ORDERED** that:

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

1 Plaintiff shall file proof of such service with the Court no later than July 11, 2024. Any
2 papers opposing the OSC or preliminary injunction shall be filed with the Court and served upon
3 Plaintiff by the Enjoined Parties no later than July 11, 2024. Reply papers by Plaintiff, if any,
4 shall be filed with the Court and served on the Enjoined Parties no later than July 15, 2024.

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

8
9 **TEMPORARY RESTRAINING ORDER**

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

12 Defendant ELVIRA TAYLOR, and non-parties Binance Holdings Ltd., and OK Group,
13 and/or any of their agents, servants, employees, attorneys, affiliates, partners, successors,
14 assigns, subsidiaries, or any other persons through which they act, or who act in active concert or
15 participation with any of them, and any individual or entity who receives actual notice of this
16 Order through personal service or otherwise, whether acting directly or through any trust,
17 corporation, subsidiary, division or other device, or any of them [(collectively, the “Enjoined
18 Parties”)], are hereby temporarily restrained from withdrawing, transferring, selling,
19 encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets
20 identified in Appendix A of this Order, whether such property is located inside or outside of the
21 United States of America:

22 Plaintiff’s attorneys shall cause a copy of this Temporary Restraining Order, together
23 with a copy of the papers upon which it is based, as well as the Verified Complaint and the
24 summons in this action, to be served upon the person or persons controlling the wallets identified
25 in Appendix A of this Order via a special purpose token or similar device delivered into each of
26 the wallets identified in Appendix A of this Order, and each of these service tokens will contain a
27 hyperlink to a website maintained by Plaintiff’s counsel that will include both this Order and all
28

1 papers upon which it is based. The hyperlink will include a mechanism to track when a person
2 clicks on the hyperlink. This process shall constitute actual notice of this Order and sufficient
3 service of process on Defendants and the person or persons controlling the corresponding wallet
4 addresses identified in Appendix A of this Order.

5 Binance Holdings Ltd and OK Group, and/or any of their agents, servants, employees,
6 attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through
7 which they act, or who act in active concert or participation with any of them, who receive actual
8 notice of this Order by personal service or otherwise, are hereby directed, within twenty-four
9 (24) hours of receiving actual notice of this Order to provide notice of the same to any of their
10 customers associated with any of the wallet addresses identified in Appendix A of this Order,
11 including Defendant ELVIRA TAYLOR, and provide counsel for Plaintiff a copy of such notice.

12
13 **IT IS FURTHER ORDERED** that:

14 This Temporary Restraining Order shall expire on July 18, 2024 at 11:00 p.m. Pacific
15 Daylight Time unless extended by the Court.

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

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

21
22 **IT IS SO ORDERED.**

23
24 DATED: _____



By: Elihu M. Berle

Judge of the Superior Court

Elihu M. Berle / Judge

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

APPENDIX A

OKX

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY
- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

Binance

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe
- TVBfaX2DF6kBxeveJMEgDjXwpY9zQpES57
- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ
- TAwsDzJgxYhsTkrLkkPiFZsZnkcjmhupfW
- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB
- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2
- TYWjiCsJJ4wAem1unRFybcvQq9ekL8Btv
- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn
- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7
- TYuEjjSM89QJkkkUX3UyY6TxT6QvhzAc37
- TQnKVsgfboAuwepfSwgNxX2pnMgQLVku4h
- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m
- TXYG7jR37cLtNVgSzqjPZwJk9zb7XMqk6e

EXHIBIT B

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*

FILED
Superior Court of California
County of Los Angeles

07/17/2024

David W. Slayton, Executive Officer / Clerk of Court

By: E. Muñoz Deputy

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

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

13 Plaintiff,

14 v.

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

17 Defendants.

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

18
19
20
21
22
23
24
25
26
27
28

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 RECEIVED at FILE
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 F&I ~ iC 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 F&I ~ iC 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 F&I ~ iC 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 ~~10/20/2020~~ 10/20/2020 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
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

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

IT IS SO ORDERED.

DATED: 07/17/2024



A. F. Higginbotham

Judge of the Superior Court, Judge

1 **APPENDIX A**

2

3 Binance

4 15PGbkbXoVSQXWTHXwrcJPevq8NV5Ffdho

5 1A2PWvYo8EmysLFbYL99gGHK3haqRo9fiN

6 13GJh5kyqfgtsb5GP6VqH2fvAEQLPzPp5X

7 1LF7Vo9qsx1KLvUnRJc3yqhXYkzCjic1zw

8 14rTVLjXHasdcqRH2p24kFVnkcWSvahCzU

9 166r3x91TfWh8D27Ej2QkcUT3qTyHPLJmZ

10 1MoYksuZoQwpvrGUAkXYtrwrrPK9ByG4Tj

11 1CGbRD4qfFjkQpNggKF3EJzj9wJhSatWt2

12 1LZQbKLcHzMeHPEq52hLrjEnoSJz39ahsq

13 1FQqrmfVoVQuUQEMAZsXkHeT4nkYja4gm

14 1Ntq5herKqrKa3iGUA9rQvcVwB3VAEKCNJ

15 12QAqsBQUQXwniXA21gRrASbpokjdvhz15

16 19vLaAuy16Cbh7zfxaHoBvG4Nof3QwbtoR

17 1KBVi3EdFfDsXJvd6Xuyeum8oKugnaCffP

18 1J9hSv4yBgz2xWUbfhZMQHSw8yFAqFw7m

19 1PCJbKmF1aZSeeodMQNbS6dKe6FDv4JqFF

20 1HS7voGRhq73mg4dmoy4jt8We8Zthnqd6p

21 1CGbRD4qfFjkQpNggKF3EJzj9wJhSatWt2

22 1DF2tninBnokz9L4Tb61U8Pv8zc3Rggg8P

23 1EyKJN6JT xvQergHhcJUWyYzgcdhZ1Lqeo

24 KuCoin

25 3L5HM9PvUqu9YwKgNLVylggCZ84sCp8KWZ