MICHAL CLIDTA

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

VISHAL GUPTA	
Plaintiff,	Case No. 2025-009259-CA-01
v.	
JOHN DOES NOS. 1-25	
Defendants.	

## **EX PARTE MOTION FOR SERVICE BY OTHER MEANS**

**COMES NOW,** Plaintiff, VISHAL GUPTA, by and through undersigned counsel, and moves the Court pursuant to Florida Statute § 48.102, to serve the Defendants by other means, and in support thereof states:

- The instant case involves widespread fraud by Defendants regarding cryptocurrency as detailed in the Complaint.
- 2. The Defendants in this case are persons of unknown citizenship, whose true identity and residence is currently unknown and subject to ongoing investigation.
- 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 Statues.
- 4. As such, the process to serve them can be done electronically by essentially using an IDM process in their accounts and once they accept it, they will be automatically sent a copy of the Complaint in this case and all attachments, including the order being sought herein.
- 5. Attached as Exhibit 1, please find a diagram of the service of process sought herein. In this particular case, part #4 will be done through the IDM process for Ethereum.

6. Because no Defendant has been served this Motion is being submitted ex parte.

WHEREFORE, the undersigned requests that the Court

- (i) Issue and Order and summons permitting service to be completed as outlined herein.
- (ii) Direct in such order that upon completion of service, Defendant must file a response to the Complaint within twenty (20) days.

Respectfully submitted,

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