PRESENT: HON. RICHARD G. LATIN

At IAS Part 46 of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse, 71 Thomas Street, New York, New York 10013 on this 18th day of December , 2023

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

RACHEL POUYAFAR, on behalf of herself and all others similarly situated,)	
)	Index No. 654820/2023
Plaintiff,)	Hon. Richard G. Latin, J.S.C.
)	
-against-)	{PROPOSED } ORDER
)	TO SHOW CAUSE
YUNHAI QUAN and JOHN DOE NOS. 1-25,)	FOR SEALING ORDER
)	MS #3
Defendants.)	
)	

Upon the annexed Affirmation of Charles Zach dated December 8, 2023, the Affirmation of Rishi Bhandari dated December 8, 2023 and Memorandum of Law in Support, and all prior pleadings, papers and proceedings heretofore had herein, and good cause being alleged therefore,

LET Defendants Yunhai Quan and John Doe Nos. 1-25 (together, "Defendants") show cause before this Court, at a virtual appearance via Microsoft Teams, on <u>December 22</u>, 2023. at <u>10:00</u> a.m./p.m., or as soon thereafter as counsel may be heard, why an order should not be issued permitting Plaintiff Rachel Pouyafar ("Class Plaintiff"), on behalf of herself and all others similarly situated, to temporarily file under seal unredacted copies of:

- (a) Class Plaintiff's First Amended Complaint dated December 8, 2023;
- (b) Class Plaintiff's proposed Order to Show Cause for a preliminary injunction and temporary restraining order;
- (c) The Memorandum of Law in Support of the Order to Show Cause for a preliminary injunction and a temporary restraining order dated December 8, 2023; and

(d) The Affirmation of Charles Zach in Support of Class Plaintiffs' proposed Order to Show Cause for a preliminary injunction and a temporary restraining order dated

December 8, 2023, and

(e) The order to show cause for preliminary injunction and temporary restraining order (motion seq. # 2) and publicly file redacted versions of those documents to the extent practicable, until such time as the Court rules on Class Plaintiff's application for a preliminary injunction and temporary restraining is adjudicated and any resulting Order of the Court is implemented, and it is further

ORDERED that, pending a hearing and determination of this Order to Show Cause, access to the aforementioned documents is restricted to Class Plaintiff's attorneys and authorized court personnel; and it is further

ORDERED that Mandel Bhandari LLP, Class Plaintiff's attorneys, shall cause to be served a copy of this Order to Show Cause, together with a copy of the papers upon which it is based, on or before December 19, 2023, upon the person or persons controlling the cryptocurrency wallets set forth in Appendix A to the Amended Complaint via special-purpose Ethereum-based tokens (the "Service Tokens"), delivered or airdropped into the wallets set forth in Appendix A to the Amended Complaint. The Service Tokens will contain a hyperlink (the "Service Hyperlinks") to a website Mandel Bhandari LLP will cause to be created, wherein Mandel Bhandari LLP shall cause to be published this Order to Show Cause and all papers upon which it is based. The Service Hyperlinks will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute good and sufficient service for purposes of jurisdiction under New York law on the person or persons controlling the cryptocurrency wallets set forth in Appendix A to the Amended Complaint; and it is further

ORDERED, that opposing papers, if any, to this motion shall be served via mail to Mandel Bhandari LLP, 80 Pine Street, 33rd Floor, New York, NY 10005, and via email to

o@mandelbhandari.com, so as to be received on or before, 2023, and reply
apers, if any shall be filed and served in the manner set forth above so as to be received on or
efore, 2023.
Pated: New York, New York
ENTER:
12 Pation
Hon. Richard G. Latin, J.S.C.