

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

RACHEL POUYAFAR, on behalf of herself)	
and all others similarly situated,)	
)	
Plaintiff,)	
)	
-against-)	
)	
YUNHAI QUAN and JOHN DOE NOS. 1-25,)	
)	
Defendants.)	
)	

Index No. 654820/2023

**AFFIRMATION
OF RISHI BHANDARI**

I, Rishi Bhandari, an attorney admitted to practice before the courts of the State of New York, and not a party to this action, hereby affirm the following to be true under the penalties of perjury:


1. I am an attorney with the law firm Mandel Bhandari LLP, attorneys for Class Plaintiff Rachel Pouyafar (“Class Plaintiff”), on behalf of herself and all others similarly situated (the “Proposed Class Members”), in the above-caption action. I am familiar with the subjects of this Affirmation.

2. I hereby affirm that pursuant to CPLR 2217(b) that Plaintiff has not previously sought the relief sought by this order to show cause to provisionally file under seal certain documents in this action.

3. As described more fully in the affirmation of Charles Zach and memorandum of law in support of this request to file certain documents under seal, to file these documents publicly before entry of a TRO would allow Defendants to move the stolen assets beyond the reach of Class Plaintiff and the Proposed Class Members, thereby defeating any subsequent

Court order freezing the assets. This prejudice is why Class Plaintiff seeks to file certain documents under seal in this action.


Dated: New York, New York
December 8, 2023

By: 
Rishi Bhandari, Esq.

Certification Pursuant to 22 NYCRR § 202.8-b

I, Rishi Bhandari, at attorney duly admitted to practice law before the courts of the State of New York, hereby certifies that this Memorandum of Law contains 339 words, excluding the parts exempted by § 202.8-b(b), and therefore complies with the word count limit set forth in 22 NYCRR § 202.8-b(a).

Dated: New York, New York
December 8, 2023

By: 
Rishi Bhandari, Esq.