

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

RACHEL POUYAFAR, on behalf of herself
and all others similarly situated,

Plaintiff,

-v-

YUNHAI QUAN, JOHN DOE NOS. 1-25,

Defendants.

Index No. 654820/2023

Hon. Richard G. Latin, J.S.C.

Part 46

Mot. Seq. #001

**AFFIRMATION OF RISHI
BHANDARI**

RISHI BHANDARI, an attorney admitted in the State of New York, affirms the following pursuant to CPLR § 2106 under penalty of perjury:

1. I am a partner at Mandel Bhandari LLP, attorneys for Plaintiff Rachel Pouyafar. I submit this Affirmation in support of Plaintiff's Motion for Class Certification.

2. Ms. Pouyafar is represented in this action by my firm Mandel Bhandari, Bishop Partnoy LLP and Adam Zarazinski, Esq. pursuant to an engagement letter in which she is represented on a contingency fee basis, with costs and expenses advanced on her behalf.

3. Ms. Pouyafar has actively monitored this case through discussions with her counsel and by reviewing filings and relevant documents and is prepared to fulfill any discovery obligations. She should be appointed to serve as Class Representative here.

4. Ms. Pouyafar's counsel has relevant experience in New York State litigation, class action cases and cryptocurrency, and are qualified to represent Ms. Pouyafar and the Class Members as Class Counsel.

5. Bishop Partnoy LLP has two main areas of practice, fiduciary duty litigation and securities class actions, and its recent experience includes Grabski v. Andreessen, et al., C.A. No. 2023-0464-KSJM (Del. Ch.), which involves the cryptocurrency platform Coinbase Global, Inc.

6. Bishop Partnoy's partners on this matter include Robert E. Bishop, who is an Associate Professor at Duke Law School. Bishop was the senior advisor on financial markets at the U.S. Department of the Treasury during the COVID-19 pandemic, where he played an integral role on economic relief efforts. Before his doctoral studies, he advised a Commissioner at the U.S. Securities and Exchange Commission, and before graduate school, he served in the Middle East and East Africa with the U.S. Department of Defense. He clerked on the Delaware Court of Chancery. The firm's partners on this matter also include Frank Partnoy, the Adrian A. Kragen Chair in Law at UC Berkeley. Partnoy has represented individual and institutional investors in a wide range of business and securities disputes since the 1990s. He was a litigator at Covington & Burling LLP and has been a consulting lawyer and expert in dozens of complex cases for more than two decades. He has published dozens of widely-cited academic articles and several books.

7. Adam Zarazinski is a graduate of the University of Michigan Law School and a former U.S. Air Force Judge Advocate, where he served as a prosecutor at Joint Base Andrews and operations law attorney in Afghanistan. He managed and developed projects on new technology for international organizations like INTERPOL and the World Health Organization. Zarazinski is the CEO of Inca Digital, an open-source intelligence company that builds data analytics tools for cryptocurrency. Inca has worked with financial institutions and regulatory and law enforcement agencies, including the Commodity Futures Trading Commission, Ontario Securities Commission, and state attorneys general. Among other things, Inca Digital has partnered with Defense Advanced Research Projects Agency (DARPA), an agency of the U.S. Department of Defense responsible for developing emerging technologies, to develop a crypto ecosystem mapping tool to analyze crypto financial data and risk.

8. My firm Mandel Bhandari LLP is a trial-focused litigation boutique based in Manhattan, with a broad practice that includes business disputes and employment and civil rights cases in New York State and federal courts. Since it was founded in 2009, the firm has achieved favorable results against ten of the Amlaw 100 list of the country's biggest law firms, and has been lead counsel in dozens of trials and arbitrations. Our trial experience includes successfully representing 20 plaintiffs in a jury trial before the Hon. Jed S. Rakoff in a Fair Labor Standards Act collective action case, McGlone, et al. v. Contract Callers, Inc., No. 1:11-cv-030004 (S.D.N.Y.). My firm's recent experience includes representing plaintiffs in the antitrust class action Simon and Simon, PC v. Align Technology, Inc., No. 3:20-cv-03754-VC (N.D. Cal.); representing defendants CVS Pharmacy, Inc. and Target Corporation in the consumer class action La Rosa et al. v. Abbott Laboratories et al., No. 1:22-cv-05435 (E.D.N.Y.); and a variety of matters in New York State Supreme Court, including representing the plaintiff in The Brooklyn Tabernacle v. Thor 180 Livingston LLC, et al., No. 518739/2019 (Sup. Ct. Kings Cnty.); representing defendants in Jones Day v. Serenity Pharmaceuticals LLC, et al., No. 657373/2019 (Sup. Ct. N.Y. Cnty.) and the plaintiff in Chao Jiang v. Ping An Insurance, et al., No. 652260/2015 (Sup. Ct. N.Y. Cnty.).

Dated: New York, New York
April 12, 2024



Rishi Bhandari