

80 Pine Street | 33rd Floor | New York, NY | 10005 | T. (212) 269-5600 | F. (646) 964-6667 | www.mandelbhandari.com

November 6, 2025

BY EMAIL

Binance.com Law Enforcement legal@binance.com

Re: Transfer Notification Pursuant to Turnover Order Entered by New York State Supreme Court on October 22, 2025

Dear Sir or Madam:

Attached is the Notice of Entry for the Turnover Order (the "Turnover Order") that was entered by the New York Supreme Court (New York County) on October 22, 2025, in the case captioned <u>Pouyafar v. Yunhai Quan, et al.</u>, Index No. 654820/2023.

This letter is the **Transfer Notification** that must be sent to legal@Binance.com pursuant to the Turnover Order.

The Turnover Order requires that "within thirty (30) days of service of the later of (a) this Order with Notice of Entry and (b) the **Transfer Notification**," the Seized Assets; and any other assets belonging to Defendants (up to the amount of the \$10,266,602.68 Judgment) shall be transferred to one or more cryptocurrency wallet addresses designated in the **Transfer Notification**.

As defined in the Turnover Order, the Seized Assets are "cryptocurrency assets in accounts on the cryptocurrency exchange Binance Holdings Ltd. ('Binance') associated with the following Binance deposit wallet addresses":

- 1. 0xcc21d63f7f1201c201c574af1d4d8be4a7a85c45
- 2. 0x0847a80fcf205bc9850825210cbcb0f1da0cc083
- 3. 0x0e740ce9a4707d38dc7c2ebaccc35df2b42c43e8
- 4. 0x47a885fc9d952b46eb961c9f9346fdb5a3ccce31
- 5. 0xa861175e2a696d5afe06e84336ccb94568087b73
- 6. 0x0f6a3a689426c592370de20d6b1ec093ea17d219
- 7. 0x94307efb4be20e2cfd257842cf1b7224768aeed9
- 8. 0xd11573c7065ad6fb967b596d3c020ab93f7f0685
- 9. 0x5213ebc0746b9e441680a4e7417f48e6f6aa344d
- 10. 0x8774b7134c3ea3405a1ff9fced90d7c1b50e1d85
- 11. 0xbd1d2f3e03ca9e82813446052be35473843a6b59
- 12. 0x038a2cf462dafb509696405f7a02e9fa2e498d5c
- 13. 0x27a93d839cdbdce1e648ec8e3febf79387c52cc2

- 14. 0x84d174ae1478db35beaa0b878e681b8053f71460
- 15. 0x753ebfaba611a0820af0c455a7d29a7d73267fee
- 16. 0x134583c611aaf9f126eb63fbdd9e4359b95db1dd
- 17. 0xead0c6d566bf874b8f27e164772ea7afd28fbd2f
- 18. 0x99895845183ce5283ca87563e883a4ecd546a477
- 19. 0x504434da8c50bfcae5dfcfdb3c7daf5112ba6d5c
- 20. 0x247f0db29097501184e19c285c2a3e0eae1d874f
- 21. 0x8b8a28566f56893d3d3a7599fe4c7809687d8cd0
- 22. 0x7DBa1df8fC3953d20637178D50797B1b57B3191C
- 23. 0x22c00e46deaa2bf271c2578b45e66ad6f9df1b80
- 24. 0x61876383236191b546ca706a55eb9832f26b82b1
- 25. 0x01d19c7dab1da4d2c9a7a8c54a9c1e9b7b5a7b9a

TRANSFER NOTIFICATION INSTRUCTIONS

Pursuant to the Turnover Order, we request that the Seized Assets denominated in (i) ETH, (ii) USDT, (iii) BTC, (iv) ADA, and (v) DOGE, be transferred to the following designated wallets:

Designated Recipient Wallets:

- **For Ethereum (ETH)**: 0x469e3b9b3B2e2f298a40058Fb2783Fd817414d21
- For Tether (USDT): 0x86e543338693187f430Cc0cdDb9556723C3cDeC9
- For Bitcoin (BTC): 3NshyrTTSV2nX2DzN3RQikrgWUR67PCbbh
- For Cardano (ADA): addr1v9pvaedcz8mmkazaq2he4whsq3lzlaguzdsh3g9756lsq2q9py2hz
- For Dogecoin (DOGE): DSFAovZQT1nt7NVQ3cXUaPQGs8ieZJdjP7

Please confirm receipt of this notice and advise on the next steps necessary to complete the transfer in accordance with the Court's directive or simply confirm when the transfers have been made. Please let us know if you have any questions or would like to discuss. Thank you in advance for your cooperation.

Best regards,

Rishi Bhandari

V. BU.

FILED: NEW YORK COUNTY CLERK 10/22/2025 02:00 PM

NYSCEF DOC. NO. 109

INDEX NO. 654820/2023

RECEIVED NYSCEF: 10/22/2025

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, JOHN DOE NOS. 1-25,

Defendants.

Index No. 654820/2023

Hon. Richard G. Latin

IAS Part 46

NOTICE OF ENTRY

PLEASE TAKE NOTICE that attached is a true and correct copy of the Decision +
Order in Mot. Seq. #006 in the above-captioned matter dated October 7, 2025 (NYSCEF Doc.
No. 108), and entered in the Office of the Clerk of the Supreme Court held in and for New York
County on October 22, 2025.

Dated: New York, New York October 22, 2025

> MANDEL BHANDARI LLP 80 Pine Street, 33rd Floor New York, New York 10005 (212) 269-5600 bj@mandelbhandari.com

By: /s/ Brice Jastrow

Brice Jastrow

Attorneys for Plaintiff

FILED: NEW YORK COUNTY CLERK 10/22/2025 12:00 RM

NYSCEF DOC. NO. 109

INDEX NO. 654820/2023

RECEIVED NYSCEF: 10/22/2025

SUPREME COURT OF THE STATE OF NEW YORK NEW YORK COUNTY

PRESENT: HON. RICHARD G. LATIN			PART	46M	
		Justice			
		X	INDEX NO.	654820/2023	
RACHEL POUYAFAR,			MOTION DATE	09/15/2025	
	Plaintiff,		MOTION SEQ. NO.	006	
	- V -				
YUNHAI QUAN, JOHN DOES 1 TO 25 Defendant.			DECISION + ORDER ON		
			MOTIC	ON	
		X			
83, 84, 85, 86, 87, 88, 89 were read on this motion	cuments, listed by NYSCEF of 9, 90, 91, 92, 93, 94, 95, 96, 9 to/forcuments, the motion is gra	97, 98, 99, 10 TUR	00, 101, 102, 103, 104 RNOVER PROCEEDIN	I, 105, 106 NG .	
10/7/2025 DATE	_		RICHARD G. VAT	tion	
CHECK ONE:	X CASE DISPOSED	□ NO	ON-FINAL DISPOSITION	, 0.0.0.	
		-	ANTED IN PART	OTHER	
APPLICATION:	SETTLE ORDER	su	BMIT ORDER		
CHECK IF APPROPRIATE:	INCLUDES TRANSFER/REASS	SIGN FIF	DUCIARY APPOINTMENT	REFERENCE	

FILED: NEW YORK COUNTY CLERK 10/22/2025 12:58 RM

NYSCEF DOC. NO. 109

INDEX NO. 654820/2023

RECEIVED NYSCEF: 10/22/2025

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. No. 06

ORDER DIRECTING TURNOVER OF CRYPTOCURRENCY ASSETS

Upon the Judgment entered by this Court on December 13, 2024, in favor of Class Plaintiff-Judgment Creditor Rachel Pouyafar, on behalf of herself and all others similarly situated ("Class Plaintiff"), against Judgment Debtors Yunhai Quan and John Doe Nos. 1-25 in the amount of \$10,266,602.68, and upon Class Plaintiff's Proposed Order to Show Cause for a Turnover Order pursuant to CPLR 5225(a), and the Affirmation of Rishi Bhandari and the exhibits thereto demonstrating that the Defendants hold cryptocurrency assets in accounts on the cryptocurrency exchanges Binance Holdings Ltd. ("Binance") associated with the following Binance deposit wallet addresses (each Binance deposit wallet address a "Deposit Wallet" and the funds in each account associated with that Deposit Wallet, collectively the "Seized Assets"):

- 1. 0xcc21d63f7f1201c201c574af1d4d8be4a7a85c45
- 2. 0x0847a80fcf205bc9850825210cbcb0f1da0cc083
- 3. 0x0e740ce9a4707d38dc7c2ebaccc35df2b42c43e8
- 4. 0x47a885fc9d952b46eb961c9f9346fdb5a3ccce31
- 5. 0xa861175e2a696d5afe06e84336ccb94568087b73
- 6. 0x0f6a3a689426c592370de20d6b1ec093ea17d219

FILED: NEW YORK COUNTY CLERK 10/22/2025 02:00 RM

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7. 0x94307efb4be20e2cfd257842cf1b7224768aeed9

- 8. 0xd11573c7065ad6fb967b596d3c020ab93f7f0685
- 9. 0x5213ebc0746b9e441680a4e7417f48e6f6aa344d
- 10. 0x8774b7134c3ea3405a1ff9fced90d7c1b50e1d85
- 11. 0xbd1d2f3e03ca9e82813446052be35473843a6b59
- 12. 0x038a2cf462dafb509696405f7a02e9fa2e498d5c
- 13. 0x27a93d839cdbdce1e648ec8e3febf79387c52cc2
- 14. 0x84d174ae1478db35beaa0b878e681b8053f71460
- 15. 0x753ebfaba611a0820af0c455a7d29a7d73267fee
- 16. 0x134583c611aaf9f126eb63fbdd9e4359b95db1dd
- 17. 0xead0c6d566bf874b8f27e164772ea7afd28fbd2f
- 18. 0x99895845183ce5283ca87563e883a4ecd546a477
- 19. 0x504434da8c50bfcae5dfcfdb3c7daf5112ba6d5c
- 20. 0x247f0db29097501184e19c285c2a3e0eae1d874f
- 21. 0x8b8a28566f56893d3d3a7599fe4c7809687d8cd0
- 22. 0x7DBa1df8fC3953d20637178D50797B1b57B3191C
- 23. 0x22c00e46deaa2bf271c2578b45e66ad6f9df1b80
- 24. 0x61876383236191b546ca706a55eb9832f26b82b1
- 25. 0x01d19c7dab1da4d2c9a7a8c54a9c1e9b7b5a7b9a

IT IS HEREBY ORDERED that Class Plaintiff's motion for a Turnover Order pursuant to CPLR 5225(a) is Granted; and it is further

ORDERED that Class Plaintiff shall serve, within twenty (20) days of entry of this Order (i) this Order with Notice of Entry; and (ii) a document designating one or more cryptocurrency

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wallet addresses where Defendants shall transfer the Seized Assets (the "Transfer Notification"):

(a) by email to legal@binance.com; and (b) via the Input Data Message process by which a

message will be sent to the Deposit Wallets using the Input Data field on a transaction on the

Ethereum blockchain. The message will contain a hyperlink to a website Mandel Bhandari LLP

will cause to be created, wherein Mandel Bhandari LLP shall cause to be published this Order

and the Transfer Notification.

It is further **ORDERED** that Defendants shall, within thirty (30) days of service of the

later of (a) this Order with Notice of Entry and (b) the Transfer Notification, transfer (i) the

Seized Assets; and (ii) any other assets belonging to Defendants (up to the amount of the

Judgment) to one or more cryptocurrency wallet addresses designated in the Transfer

Notification.

It is further **ORDERED** that the Clerk will maintain Exhibits 1-25 to the Affirmation of

Rishi Bhandari, dated September 15, 2025, under seal until further order from this Court.

IT IS SO ORDERED.

Dated: October 7, 2025

THE HON. RICHARD G. LATIN, J.S.C.

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