

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

SHAMEELA KARMALI-RAWJI, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

TRUSTWAVE.TRADE, AVIV NAFTALI,  
JANE DOE 1 and JOHN DOE NOS. 1-10,

Defendants.

Index No. 150162/2025

AFFIRMATION OF JOHN CURRAN IN  
SUPPORT OF PLAINTIFF’S MOTION  
FOR A TEMPORARY RESTRAINING  
ORDER

JOHN CURRAN, an attorney duly admitted to practice in the courts of New York State,  
affirms the following under penalty of perjury, pursuant to CPLR § 2106:

1. I am an attorney with the law firm Walden Macht Haran & Williams LLP, attorneys  
for Plaintiff Shameela Karmali-Rawji (“Plaintiff”) in the above-captioned action. As such, I am  
fully aware of the facts and issues in this matter. I make this Affirmation, based upon my personal  
knowledge, in support of Plaintiff’s motion for a temporary restraining order.

2. I hereby affirm that pursuant to Uniform Rule 202.7(f) (22 N.Y.C.R.R. § 202-7(f))  
giving notice to Defendants of the application here for a preliminary injunction and temporary  
restraining order would result in significant prejudice to Plaintiff. As described more fully in these  
papers, including the Complaint and accompanying affirmation of Adam Zarazinski, absent the  
immediate injunctive relief sought here, there will be nothing to prevent Defendants from  
transferring or otherwise dissipating Plaintiff’s assets, in violation of New York law and causing  
her irreparable harm. This prejudice is why Plaintiff seeks a temporary restraining order pending  
a hearing on the request for a preliminary injunction.

3. Attached as Exhibit 1 is a true and correct copy of an Order to Show Cause and Temporary Restraining Order dated October 25, 2024, in the case Chait v. Lee, Index No. 159881/2024, NYSCEF Doc No. 15, in the Supreme Court of the State of New York, County of New York.

4. Attached as Exhibit 2 is a true and correct copy of an Order dated December 13, 2023, in the case Blum v. Defendant 1, 23-CV-24734-MCR-HTC in the U.S. District Court for the Northern District of Florida (ECF Doc. No. 6).

5. Attached as Exhibit 3 is a true and correct copy of an Order to Show Cause and Granting Motion for Temporary Restraining Order dated March 18, 2024, in the case Shaya v. Nofs, 24-CV-10670-MAG-EAS in the U.S. District Court for the Eastern District of Michigan (ECF Doc. No. 4).

6. I hereby affirm pursuant to Uniform Rule of the Chief Administrator 130-1.1-a (22 N.Y.C.R.R. § 130-1.1, 130-1.1a) that, to the best of my knowledge, information and belief, formed after a reasonable inquiry under the circumstances, the following papers listed below and the contentions therein are not frivolous as defined in 22 N.Y.C.R.R. § 130-1.1(c):

- a. Complaint;
- b. Request for Judicial Intervention;
- c. Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction;
- d. Affirmation of Shameela Karmali-Rawji in Support of Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction;
- e. Affirmation of Adam Zarazinski in Support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction;
- f. Proposed Order to Show Cause and Temporary Restraining Order.

7. Pursuant to CPLR § 2217(b), Plaintiff has not previously sought the relief sought by this motion brought by order to show cause, and there have been no prior motions or proceedings in this matter.

Dated: New York, New York  
January 5, 2025

/s/ John Curran  
John Curran

**Certification Pursuant to 22 NYCRR § 202.8-b**

I, John Curran, at attorney duly admitted to practice law before the courts of the State of New York, hereby certifies that this Affirmation contains 479 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  
January 5, 2025

By: /s/ John Curran  
John Curran