

At IAS Part \_\_ of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse, 60 Centre Street, New York, New York 10007 on this \_\_ day of \_\_\_\_\_ 2025

Present: Hon \_\_\_\_\_ JSC

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

**ORDER  
TO SHOW CAUSE**

Upon the attached Affirmation of Adam Zarazinski, dated January 5, 2025; and Memorandum of Law in Support dated January 5, 2025, and all prior pleadings, papers and proceedings heretofore had herein, and good cause being alleged therefore,

LET Defendants Trustwave.Trade, Aviv Naftali, Jane Doe 1, and John Doe Nos. 1-10 (collectively, "Defendants") show cause before this Court, in Room \_\_\_\_\_, 60 Centre Street, New York, New York 10007, on \_\_\_\_\_, 2025, at \_\_\_\_ a.m./p.m., or as soon thereafter as counsel may be heard, why an order should not be made directing,

- a) That the pleadings, papers, affidavits, exhibits, and evidence filed with this Court in the above-titled matter; the judgements, orders and decision of this Court in the above-

entitled matter; and the transcripts of hearing held in the above-captioned matter be SEALED; and

- b) That any of the aforesaid pleadings, papers, affidavits, exhibits, evidence, judgements, orders, decisions and transcripts of hearings filed with this Court in this action be kept in the custody of the Clerk of this Court or the County Clerk at the County Courthouse for the County of New York; and
- c) That the Clerk of this Court and the County Clerk not permit any person other than a party or his counsel to spear herein to copy, examine, or peruse the aforesaid pleadings, papers, affirmations, exhibits, evidence, judgements, orders, decisions, and transcripts of hearings; and

publicly file redacted versions of those documents to the extent practicable, until such time as the Court rules on Plaintiff's application for a temporary restraining order freezing certain cryptocurrency held at the wallet addresses listed in Appendix A to the Complaint in this action (the "Deposit Wallets") and any order of the Court freezing such wallets is implemented, and it is further

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ORDERED that, pending a hearing of this motion BEFORE THE JUSTICE TO BE ASSIGNED, the Clerk of the Court is directed to restrict access to the entire file under the above caption and index number except as to the parties, their respective counsel, and authorized court personnel; and it is further

JSC  
HON. ANDREW BOBROK JSC

ORDERED that Walden Macht Haran & Williams LLP, 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 \_\_\_\_\_, 2025, upon the person or persons controlling the Deposit Wallets, via the Input Data Message ("IDM") 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 (the “Service Hyperlink”) to a website Walden Macht Haran & Williams LLP will cause to be created, wherein Walden Macht Haran & Williams LLP shall cause to be published this Order to Show Cause and all papers upon which it is based. The Service Hyperlink 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 Deposit Wallets; and it is further

ORDERED, that opposing papers, if any, to this motion shall be served on Walden Macht Haran & Williams LLP, 250 Vesey Street, 27th Floor, New York, NY 10281, so as to be received on or before \_\_\_\_\_, 2025, and reply papers, if any shall be filed and served in the manner set forth above so as to be received on or before \_\_\_\_\_, 2025.

ENTER

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J.S.C.