

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

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

[PROPOSED] ORDER
TO SHOW CAUSE AND
TEMPORARY RESTRAINING
ORDER

Upon the reading and filing of the annexed Affirmations of Class Plaintiff Shameela Karmali-Rawji (“Plaintiff”), Adam Zarazinski, and John Curran, the exhibits thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings had herein, under Civil Practice Law and Rules (“CPLR”) 6301, 6312 and 6313, wherein Plaintiff asserts that she will suffer immediate and irreparable injury in the event that Defendants Trustwave.trade, Aviv Naftali, Jane Doe 1, and John Doe Nos. 1-10 (collectively, “Defendants”) are able to sell, transfer, convey or otherwise dissipate cryptocurrency allegedly stolen from Plaintiff by Defendants; it is

ORDERED that Defendants shall 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 issued preliminarily enjoining, during the pendency of this action, the Defendants and any of their agents, representatives, or any

other person acting on their behalf, from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallet addresses listed in Appendix A to the Complaint in this action (the “Deposit Wallets”), which shall be frozen, whether located inside or outside of the United States of America, and it is further

ORDERED that, pending argument on the motion for a preliminary injunction, a Temporary Restraining Order, pursuant to CPLR § 6313, shall be entered enjoining Defendants, their agents, representatives, any other person acting on Defendants’ behalf, and any person and/or entity receiving notice of this order, including Binance Holdings Ltd. (“Binance”), from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the Deposit Wallets, which shall be frozen, whether such property is located inside or outside of the United States of America, and it is further

ORDERED that, pending the hearing of this motion, the Clerk of the Court is directed to restrict access to (i) Plaintiff’s Affirmation in support of her proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated January 5, 2025; (ii) the Affirmation of Adam Zarazinski in support of Plaintiff’s proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated January 5, 2025, (iii) the Affirmation of John Curran in support of Plaintiff’s proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated January 5, 2025, and (iv) the Memorandum of Law in Support of Plaintiff’s proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated January 5, 2025, except as to Plaintiff, her counsel, and authorized court personnel, and it is further

ORDERED that, in the exercise of the Court’s discretion pursuant to CPLR § 6313(c), Plaintiff is not required to give an undertaking pending the hearing on this Order to Show Cause;

and it is further

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.

Dated: New York, New York
_____, 2025

ORDERED

J.S.C.