

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

RADHIKA ADVANI, on behalf of herself	)	
and individuals similarly situated	)	Index No. 156048/2026
	)	
Plaintiff,	)	
	)	
-against-	)	
	)	
JOHN DOE NOS. 1-25	)	
	)	
Defendants.	)	
	)	

AFFIRMATION OF SAMUEL D. ELSWICK

I, Samuel D. Elswick, an attorney admitted to practice before the courts of the State of New York, and not a party to this action, hereby affirm the following to be true under the Penalties of perjury:

1. I am an attorney with The Gori Law Firm, P.C., attorneys for Plaintiff Radhika Advani ("Plaintiff") in the above-caption action. I am familiar with the subjects of this Affirmation.

2. I hereby affirm that pursuant to CPLR 2217(b) that Plaintiff has not previously sought the relief sought by this motion and there have been no prior motions in this matter.

3. 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 Declaration of Maya Vick, absent the immediate injunctive relief sought here, there will be nothing to prevent Defendants from further transferring or 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.

4. 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 or the contentions therein are not frivolous as defined in 22 N.Y.C.R.R. § 130-1.1(c):

- a. Verified 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. Affidavit of Plaintiff Radhika Advani in Support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction;
- e. Declaration of Maya Vick in Support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction; and
- f. Proposed Order to Show Cause and Temporary Restraining Order;

5. Defendants are believed to be anonymous actors operating through cryptocurrency wallets and encrypted messaging platforms, making traditional service impracticable.

6. Plaintiff therefore requests authorization to serve the Order to Show Cause, Temporary Restraining Order ("TRO"), Verified Complaint, Summons, and all supporting papers upon the persons controlling the wallet addresses identified in **Exhibit A** to the proposed OSC through the delivery of a special-purpose blockchain token or similar digital notification transmitted to those wallet addresses.

7. Each service token will contain a hyperlink directing the recipient to a secure website maintained by Plaintiff's counsel containing the Court's OSC and all associated filings. The hyperlink will include tracking functionality capable of confirming when the recipient accesses the documents.

8. Because Defendants used blockchain wallet addresses and online messaging platforms to conduct the alleged fraudulent scheme, service through those same digital channels is reasonably calculated to provide actual notice.

9. Plaintiff respectfully requests that the Court authorize alternative service through the wallet addresses identified in **Exhibit A** of the proposed OSC, as well as through any electronic messaging platforms associated with Defendants' communications with Plaintiff.

10. Expedited discovery is necessary to identify Defendants and trace the stolen assets before they can be further transferred or dissipated.

11. Plaintiff seeks records sufficient to identify the account holders, including customer identification and know-your-customer ("KYC") documentation, associated accounts or wallet addresses controlled by the same user, transaction records reflecting transfers to or from the identified wallets, and related account access information such as IP logs and login history.

Dated: New York, New York
May 13, 2026

Respectfully submitted,

THE GORI LAW FIRM, P.C.
Attorneys for Plaintiff

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