

PRESENT: Hon. Lyle E. Frank
J.S.C.SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORKRADHIKA ADVANI, on behalf of herself)
and individuals similarly situated)

Plaintiff,)

-against-)

JOHN DOE NOS. 1-25)

Defendants.)

AmendedAT I.A.S PART 11 OF THE
SUPREME COURT OF THE STATE
OF NEW YORK, HELD IN AND FOR
THE COUNTY OF NEW YORK AT
THE COURTHOUSE LOCATED
AT 60 CENTRE THOMAS STREET,
NEW YORK NEW YORK ON THE 27th
OF May, 20 26.

Index No. 156048/2026

MS # 1

PROPOSED ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER

Upon consideration of the Summons and Verified Complaint, the Affidavit of Radhika Advani, the Declaration of Maya Vick, the Affirmation of Samuel D. Elswick, and the Memorandum of Law in support of Plaintiff's application for a preliminary injunction and temporary restraining order pursuant to CPLR §§ 6301, 6312, and 6313, and the Court finding that Plaintiff has demonstrated a likelihood of success on the merits and that immediate and irreparable injury may occur absent temporary injunctive relief, it is hereby:

Let ~~ORDERED that~~ Defendants shall show cause before this Court at IAS Part 11, Room 412, at the courthouse located at 60 Centre Street, New York, New York, on June 24, 2026, at 9:30 a.m./p.m., via submission only ~~or as soon thereafter as counsel may be heard~~, why an order should not be entered: (i) preliminarily enjoining Defendants and continuing the restraints imposed herein pending final determination of this action, from transferring, dissipating, routing, processing, selling, encumbering, or otherwise disposing of cryptocurrency traceable to Plaintiff's transfers, including but not limited to cryptocurrency located in the exchange-hosted deposit wallet addresses identified in Exhibit A and any accounts, sub-accounts, or exchange-hosted accounts

associated with or linked to those wallet addresses identified in Exhibit A to this Order, and any accounts to which such wallet addresses are credited or otherwise associated;


ORDERED that pending ~~argument~~^{the hearing} on this motion, a **Temporary Restraining Order** pursuant to CPLR § 6313 shall issue restraining Defendants and any persons acting in concert or participation with them, including but not limited to any cryptocurrency exchange, custodian, financial institution, or intermediary with actual notice of this Order, from transferring, moving, withdrawing, accessing, dissipating, or otherwise disposing of, and directing the freezing and restraint of, any cryptocurrency located in or traceable to the wallet addresses identified in Exhibit A and any accounts, sub-accounts, or wallets associated with or linked to such wallet addresses and held within or routed through exchange-hosted accounts under custodial control, whether currently maintained or hereafter identified, and any assets directly or indirectly traceable to Plaintiff's transfers, including any cryptocurrency held in accounts maintained for the benefit of, or associated with, those wallet addresses; and it is further

J.S.C.


ORDERED that this **Temporary Restraining Order** shall apply to any cryptocurrency exchange, custodian, financial institution, or intermediary that receives actual notice of this Order, and such entities are hereby directed to freeze, restrain, and prohibit access to any cryptocurrency or digital assets located in or traceable to the wallet addresses identified in Exhibit A, including any accounts to which such wallet addresses are credited and any associated or linked accounts, whether currently maintained or hereafter identified; and it is further

J.S.C.


ORDERED that, in the exercise of the Court's discretion pursuant to CPLR § 6313(c), Plaintiff's undertaking is hereby fixed in the amount of \$0 pursuant to CPLR § 6312(b), as the relief sought preserves specific, identifiable property; and it is further

J.S.C.



ORDERED that the non-party exchanges, Binance, BitGet, Crypto.com, HTX, Kraken, MaskEx, Newton Canada, OKX, Revolut, and Wealthsimple, and their respective agents, affiliates, and persons acting in concert or participation with them who receive actual notice of this Order, shall within forty-eight (48) hours of receiving this Order provide notice of this Order to any account holder associated with the wallet addresses identified in Exhibit A and any accounts, sub-accounts, or exchange-hosted accounts associated with or linked to those wallet addresses and provide Plaintiff's counsel with confirmation that such notice has been transmitted; and it is further

J.S.C.



ORDERED that Plaintiff is authorized to serve expedited discovery on the following non-party cryptocurrency exchanges: Binance, BitGet, Crypto.com, HTX, Kraken, MaskEx, Newton Canada, OKX, Revolut, and Wealthsimple for the purpose of identifying the account holders associated with the wallet addresses listed in **Exhibit A** and tracing the movement of cryptocurrency traceable to Plaintiff's transfers, including but not limited to know-your-customer (KYC) records, account holder identification information, associated or linked accounts or wallet addresses, transaction histories, and account access information including IP logs and login history; and it is further

J.S.C.

ORDERED that Plaintiff's counsel 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 May 28, 2026, upon the person or persons controlling the wallet addresses identified in Exhibit A and any accounts, sub-accounts, or exchange-hosted accounts associated with or linked to those wallet addresses via a special-purpose Ethereum-based token (the "Service Token"), delivered or airdropped into the wallet addresses identified in Exhibit A and any accounts, sub-accounts, or exchange-hosted accounts associated with or linked to those wallet addresses, and/or through any known email addresses or electronic messaging platforms associated with Defendants. The Service

Token will contain a hyperlink (the "Service Hyperlink") to a website Plaintiff's counsel will create and maintain, wherein Plaintiff's counsel 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 and shall be deemed reasonably calculated to provide actual notice for purposes of jurisdiction under New York law upon the person or persons controlling the wallet addresses identified in Exhibit A and any accounts, sub-accounts, or exchange-hosted accounts associated with or linked to those wallet addresses; and it is further

ORDERED that opposing papers, if any, shall be served upon Plaintiff's counsel, Samuel

via NYSCEF
D. Elswick, The Gori Law Firm, 122 East 42nd Street, Suite 4700, New York, New York 10168,
and via email at selswick@gorilaw.com, on or before June 18, 2026, *at 5 P.M.*
any, shall be served on or before June 23, 2026, *at 5 P.M.*

~~Dated: New York, New York~~
~~May 13, 2026~~

**ORAL ARGUMENT
DIRECTED**
[Signature]
J.S.C.

ENTER:

Date: 5/27/26
[Signature]
J.S.C.

HON. LYLE E. FRANK
J.S.C.