

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE, COUNTY, FLORIDA**

BRIAN LEIBERMAN,)	
)	CASE No. 2026-009414-CA-01
Plaintiff,)	
)	
v.)	(Injunctive Relief Requested)
)	
ATXS, ATXS ASSET MANAGEMENT, and)	
LUDVIG GUSTAV SJOSTROM,)	
)	
Defendants.)	
)	

EX PARTE MOTION FOR SERVICE BY OTHER MEANS

COMES NOW, the Plaintiff, Brian Leiberman, by and through his attorney, and moves the Court pursuant to Florida Statutes § 48.102 to serve the Defendants by other means , and in support thereof states:

1. The instant case involves widespread fraud by Defendants regarding cryptocurrency as detailed in the Complaint.
2. The Defendants in this case are all foreign and the only connection they have to Plaintiff is through electronic communications and their cryptowallets.
3. As such, after due diligence, Plaintiff cannot serve these Defendants in the traditional ways of personal service outlined in Chapter 48 of the Florida Statutes.
4. As such, the process to serve them can be done electronically by essentially using an IDM process in their accounts and once they accept it, they will be automatically sent a copy of the Complaint in this case and all attachments, including the order being sought herein.
5. Attached as Exhibit 1, please find a diagram of the service of process sought herein. In this particular case, part #4 will be done through the IDM process for Ethereum.

6. Because no defendant has been served this motion is being submitted ex parte.
7. Because the Defendants do not have identifying information other than cryptowallets, this is the only method that is viable through an exercise of due diligence.

WHEREFORE, the undersigned requests that the Court

- (i) Issue and Order and summons permitting service to be completed as outlined herein.
- (ii) Direct in such order that upon completion of service, Defendant must file a response to the Complaint within twenty (20) days.

Respectfully submitted,

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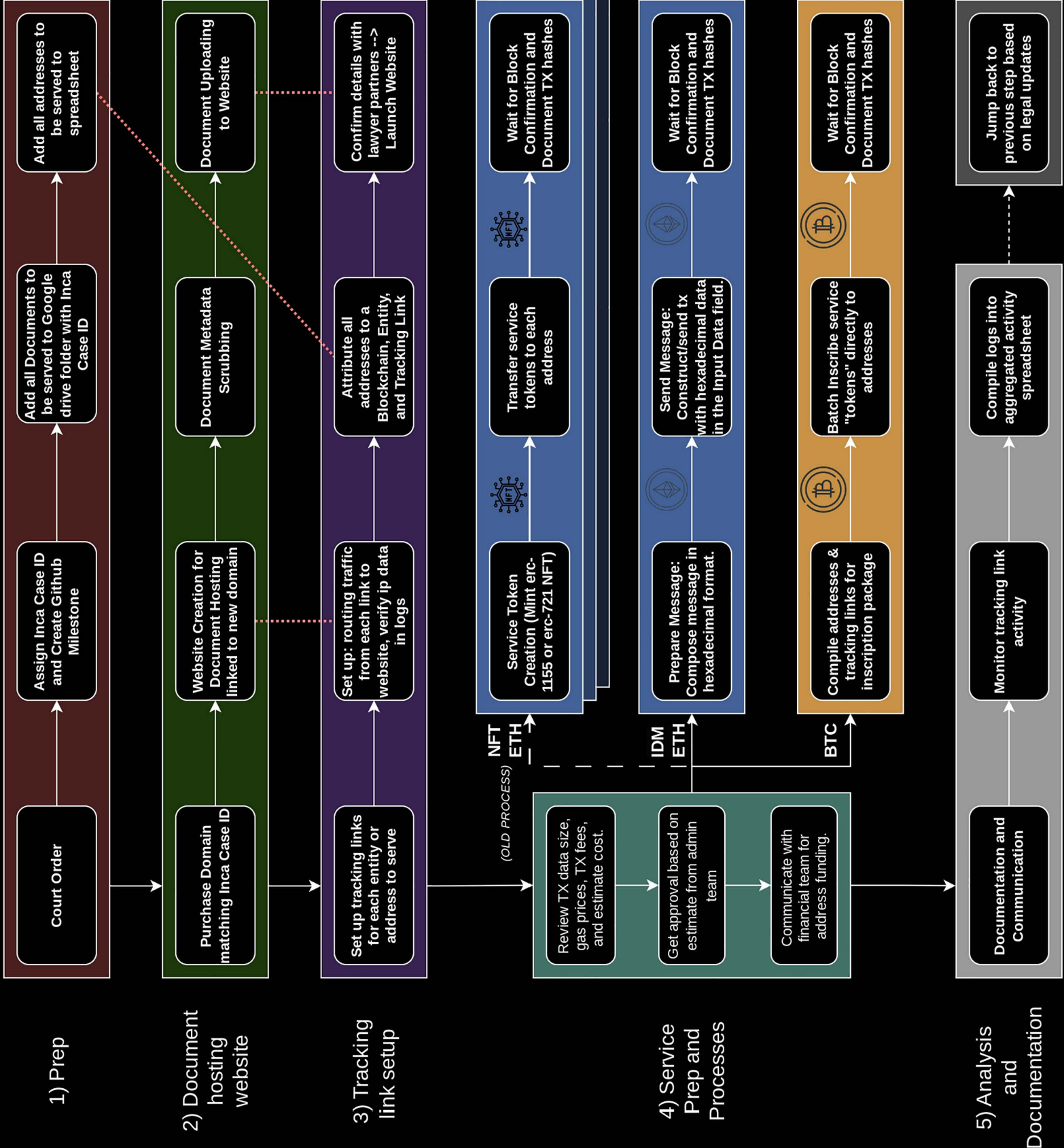


EXHIBIT 1