

# **EXHIBIT 1**

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 5:54 PM  
**To:** legal@binance.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** RE: Elmowafi v. Yang, et al  
**Attachments:** 2024.07.24 TRO Granted.pdf

This time with the TRO attached.

Best regards,

Andrew Golub



DOW GOLUB REMELS & GILBREATH, PLLC  
ATTORNEYS AT LAW

Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 5:53 PM  
**To:** legal@binance.com  
**Cc:** Geoffrey Berg <gberg@bergplummer.com>; Frank Partnoy <frank@bishoppartnoy.com>  
**Subject:** Elmowafi v. Yang, et al

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in specific wallet addresses at Binance. Those wallet addresses can be found on Exhibit A to the attached TRO.

I ask that you confirm receipt of the TRO and that you immediately freeze the Binance wallet addresses specifically identified in the attached TRO as ordered (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)

2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi’s *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff’s verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order (“TRO”), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds



that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on

the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4 : 39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed: 7/24/2024	
DATE	JUDGE PRESIDING

## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0Cf937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bf5bAA6753dB30aa937756c6b3fA30  
15Q1cvrFiG4rDPQa4CPT28v6v142KDtfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

### KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmvmHMLA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 5:57 PM  
**To:** rbenquiries@kucoin.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Elmowafi v. Yang, et al.  
**Attachments:** 2024.07.24 TRO Granted.pdf

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in a specific wallet addresses at KuCoin. The address can be found on Exhibit A to the attached TRO.

I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet address (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



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ATTORNEYS AT LAW

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2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi’s *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff’s verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order (“TRO”), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on



the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4 : 39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed: 7/24/2024	
DATE	JUDGE PRESIDING

Exhibit A

Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3BF212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0CF937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bf5bAA6753dB30aa937756c6b3fA30  
15Q1cviFiG4rDPQa4CPT28v6v142KDtfYM

OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdcce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

HTX

1MspmvmHMLVA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** support@huobi.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Elmowafi v. Yang, et al  
**Attachments:** 2024.07.24 TRO Granted[16].pdf

Hello,

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I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet address (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



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ATTORNEYS AT LAW

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2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of Herself and all others similarly situated,	§	IN THE DISTRICT COURT OF
	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi's *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff's verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order ("TRO"), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on



the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4:39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed:	
<u>7/24/2024</u>	
DATE	JUDGE PRESIDING

## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0Cf937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bfb5bAA6753dB30aa937756c6b3fA30  
15Q1cvrFiG4rDPQa4CPT28v6v142KDtfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

### KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmvmHmVLA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** support@blofin.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Elmowafi v. Yang, et al  
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Hello,

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Best regards,

Andrew Golub



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2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)





2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi's *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff's verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order ("TRO"), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\*basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on



the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4 : 39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed:	
7/24/2024	
DATE	JUDGE PRESIDING

## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0Cf937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bfb5bAA6753dB30aa937756c6b3fA30  
15Q1cvrFiG4rDPQa4CPT28v6v142KDtfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

### KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmVHMVLA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** support@bybit.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Elmowafi v. Yang, et al  
**Attachments:** 2024.07.24 TRO Granted[74].pdf

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in certain specific wallet addresses at ByBit. The addresses can be found on Exhibit A to the attached TRO.

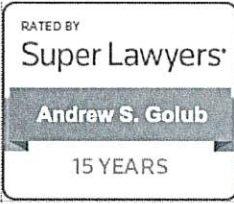
I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet addresses (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)





2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi’s *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff’s verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order (“TRO”), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on



the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4 : 39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed:	
7/24/2024	
DATE	JUDGE PRESIDING

## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0Cf937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bfb5bAA6753dB30aa937756c6b3fA30  
15Q1cviFiG4rDPQa4CPT28v6v142KDfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fdB907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

### KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmVHMVLA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** lawenforcement@okx.com; support@okx.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Elmowafi v. Yang, et al  
**Attachments:** 2024.07.24 TRO Granted[53].pdf

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in certain specific wallet addresses at OKX. The addresses can be found on Exhibit A to the attached TRO.

I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet addresses (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)





2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
Plaintiff,	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi’s *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff’s verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order (“TRO”), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on

the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4 : 39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed: 7/24/2024	
DATE	JUDGE PRESIDING



## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
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0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
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0x33D591c68bfb5bAA6753dB30aa937756c6b3fA30  
15Q1cvrFiG4rDPQa4CPT28v6v142KDtfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Ffce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14ff64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

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0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmVHMVLA2y841xapZcCEoFHiwG1yeap



## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Thursday, July 25, 2024 7:53 AM  
**To:** regulatory@huobi.com  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** Fwd: Elmowafi v. Yang, et al  
**Attachments:** image001.png; image002.png; image003.png; 2024.07.24 TRO Granted[16].pdf

Please see below and attached.

Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Boulevard, Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)

Begin forwarded message:

**From:** "Andrew S. Golub" <asgolub@dowgolub.com>  
**Date:** July 24, 2024 at 8:42:55 PM CDT  
**To:** support@huobi.com  
**Cc:** Geoffrey Berg <gberg@bergplummer.com>, Frank Partnoy <frank@bishoppartnoy.com>  
**Subject:** Elmowafi v. Yang, et al

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in a certain specific wallet address at HTX. The address can be found on Exhibit A to the attached TRO.

I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet address (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub

Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
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2024-46570 / Court: 334

CAUSE NO. \_\_\_\_\_

NATALIA ELMOWAFI, on behalf of	§	IN THE DISTRICT COURT OF
Herself and all others similarly situated,	§	
	§	
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	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
CHRIS YANG and JOHN DOES 1-25,	§	
	§	
Defendants.	§	____ JUDICIAL DISTRICT

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The Court, having read and considered Plaintiff’s verified application for temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order (“TRO”), she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds, that she has a substantial likelihood of recovery for the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte\* basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putative class members. Exhibit A is incorporated as if fully set out herein.

Therefore, upon Plaintiff’s filing with the clerk of this court a bond in the amount of \$ 1,000.00 or cash in lieu of such bond, conditioned that Plaintiff will pay all damages that may be adjudged against her if the TRO granted herein is dissolved in whole or in part, it is hereby ORDERED that:

(1) Defendants, non-parties Binance, OKX, Gate.io, KuCoin, LBank, ByBit, HTX, BloFin, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), to be served upon the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff’s counsel, counsel’s investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on



the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance Holdings Ltd and KuCoin, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that Plaintiff's application for temporary injunction is set for hearing on the docket of the 334thDistrict Court of Harris County, Texas, 201 Caroline, 14th Floor, Houston, Texas 77002 on the 30 day of July, 2024 at 10:30 o'clock a.m. As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order.

This order is entered on July 24, 2024 at 4:39 p. m.

This order expires on the \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed:	
7/24/2024	
DATE	JUDGE PRESIDING

## Exhibit A

### Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26  
0x28E6d72063A5B9B26173F81609D07aF899682f7F  
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420  
0xEeF5E766036AF94C5599C1025774706706F5B7ea  
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6  
0x723a01d4344d97b0Cf937eEc599AFF717028108d  
0x48ca7E8A3D62c546cD57BdDCE6354cfA72C3f478  
0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19  
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1  
0x6Ba52c611A6fdAb14c77B5b12b53C9B85d0A4465  
0x8851b21d296942e804b3Eaa47049BD62c7C419A8  
0x33D591c68bfb5bAA6753dB30aa937756c6b3fA30  
15Q1cvrFiG4rDPQa4CPT28v6v142KDfYM

### OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff  
0xa4A76eC9697Be8fcF1fdB907d9e2F64378c83762  
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617  
0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

### ByBit

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

### KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

### BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

### HTX

1MspmVHMVLA2y841xapZcCEoFHiwG1yeap

## Brenda Castillo

---

**From:** legal <legal+noreply@binance.com>  
**Sent:** Wednesday, July 24, 2024 5:53 PM  
**To:** Andrew S. Golub  
**Subject:** Re: Elmowafi v. Yang, et al

Dear Sir/Madam

Please note that this email address (legal@binance.com) is in restricted use.

Please note the matters listed below should be processed through the following channels:

Law enforcement requests: If you are a law enforcement or government authority, please note that Binance utilizes a dedicated portal Law Enforcement Portal, Kodex, for all communications with law enforcement. Please submit your queries directly via <https://www.binance.com/en/support/law-enforcement> where our specialist team will assist you.

Disclosure of account information or account restrictions (including but not limited to any subpoena, court order, trustee, administrator and/or liquidator request for disclosure of Binance user account information or freezing of assets): <https://www.binance.com/en/support/chat-invitation>. If you are not a Binance user, please proceed to use the same link as a "Visitor".

If you have a complaint against Binance, please contact Binance through our support team (at <https://www.binance.com/en/support/chat-invitation>) to attempt to resolve any such complaint or dispute amicably. If the support team is unable to resolve your matter, they will provide you with information on the next steps. For complaints and claims in relation to Binance's services, the dispute resolution process stipulated in Binance's Terms of Use will apply.

Any above matter that is sent to this email address instead of the correct channel will NOT receive a response.

For the avoidance of doubt, Binance does NOT accept service of legal process or any documents issued in relation to legal proceedings (including any court order) by email. The sending of any such legal document to this email address (legal@binance.com) will not constitute valid legal service. Binance reserves its rights to challenge any attempt to use this legal@binance.com email address for service of legal documents.

We thank you in advance for your understanding.

Best regards,  
Binance



## Brenda Castillo

---

**From:** legal <legal+noreply@binance.com>  
**Sent:** Wednesday, July 24, 2024 5:55 PM  
**To:** Andrew S. Golub  
**Subject:** Re: RE: Elmowafi v. Yang, et al

Dear Sir/Madam

Please note that this email address (legal@binance.com) is in restricted use.

Please note the matters listed below should be processed through the following channels:

Law enforcement requests: If you are a law enforcement or government authority, please note that Binance utilizes a dedicated portal Law Enforcement Portal, Kodex, for all communications with law enforcement. Please submit your queries directly via <https://www.binance.com/en/support/law-enforcement> where our specialist team will assist you.

Disclosure of account information or account restrictions (including but not limited to any subpoena, court order, trustee, administrator and/or liquidator request for disclosure of Binance user account information or freezing of assets): <https://www.binance.com/en/support/chat-invitation>. If you are not a Binance user, please proceed to use the same link as a "Visitor".

If you have a complaint against Binance, please contact Binance through our support team (at <https://www.binance.com/en/support/chat-invitation>) to attempt to resolve any such complaint or dispute amicably. If the support team is unable to resolve your matter, they will provide you with information on the next steps. For complaints and claims in relation to Binance's services, the dispute resolution process stipulated in Binance's Terms of Use will apply.

Any above matter that is sent to this email address instead of the correct channel will NOT receive a response.

For the avoidance of doubt, Binance does NOT accept service of legal process or any documents issued in relation to legal proceedings (including any court order) by email. The sending of any such legal document to this email address (legal@binance.com) will not constitute valid legal service. Binance reserves its rights to challenge any attempt to use this legal@binance.com email address for service of legal documents.

We thank you in advance for your understanding.

Best regards,  
Binance



## Brenda Castillo

---

**From:** lawenforcement lawenforcement <lawenforcement@okx.com>  
**Sent:** Wednesday, July 24, 2024 8:54 PM  
**To:** Andrew S. Golub  
**Subject:** Please note our email has changed Re: Elmowafi v. Yang, et al

Thank you for your email. Please be advised that this email inbox is no longer in use.

Please review our latest OKEx Law Enforcement Request Guide for detailed instructions about how to contact us at this address: <https://okxsupport.zendesk.com/hc/en-us/articles/360021858931-Law-Enforcement-Request-Guide>

Thank you for your cooperation,

OKEx Risk and Compliance Team

## Brenda Castillo

---

**From:** OKX <support@okx.com>  
**Sent:** Wednesday, July 24, 2024 9:03 PM  
**To:** Andrew S. Golub  
**Subject:** [OKX] Re: Elmowafi v. Yang, et al



Your request 5763805 has been updated. To add additional comments, reply to this email.



**OKX Support (OKX)**

Jul 25, 2024, 10:02 GMT+8

Dear valued customer,

Greetings from OKX.

We noticed that the contact email is not a registered email with OKX. If you are a registered user, kindly provide us with the email registered with OKX in order for us to locate your account for better assistance. If you are not a registered user, please also provide us with more details on the issue you are experiencing for us to assist you further.

We are looking forward to your response. Thank you.

OKX Support



Thank you for choosing OKX. Need help? [Contact our customer support.](#)

This email is provided for informational purposes and it is not an offer or solicitation. Digital assets, including stablecoins and NFTs, involve a high degree of risk and can become worthless. Please consult your legal/ tax/ investment professional regarding whether trading or holding digital assets is suitable for you. Not all products are

offered in all regions. For the full list of OKX's restricted jurisdictions and more details, please refer to the OKX [Terms of Use](#) and [Risk & Compliance Disclosure](#).

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## Brenda Castillo

---

**From:** Support <support@huobi.com>  
**Sent:** Wednesday, July 24, 2024 9:23 PM  
**To:** Andrew S. Golub  
**Subject:** [Huobi] 回复: Elmowafi v. Yang, et al: Hello, Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of \_Natalia Elmowafi v. Yang, et al\_, ...

##- Please type your reply above this line -##

Dear Customer,

Your request (2023568914) has been updated. You can reply this email for any additional comments, thank you!

Note: Huobi shall never ask you for your password or verification code of your Huobi account in any case.

---

### WBG CXA-Cori (HTX)

25 July 2024, 10:22 GMT+8

Dear Customer,

Thank you for contacting HTX Customer Service Center.

Sorry for the inconvenience caused to you. We have escalated your problem to the relevant support team and will reply to you if there is any new feedback.

If you have any questions or supplements, please send an email to [htxsupport@htx-inc.com](mailto:htxsupport@htx-inc.com), You can also reply based on this conversation, and we will answer your questions within 24 hours. Thank you for your understanding and cooperation!

Best Regards,

HTX Customer Service Center

---

### Andrew S. Golub

25 July 2024, 09:43 GMT+8

Elmowafi v. Yang, et al:  
Hello,



Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in a certain specific wallet address at HTX. The address can be found on Exhibit A to the attached TRO.

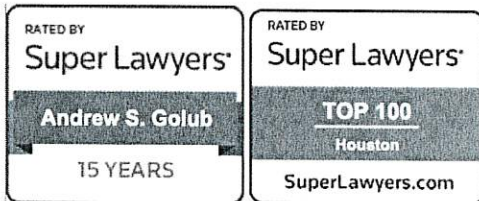
I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet address (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub



Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)



Attachment(s)  
[2024.07.24 TRO Granted\[16\].pdf](#)

This email is a service from HTX. Delivered by [Zendesk](#)

## Brenda Castillo

---

**From:** Support <support@huobi.com>  
**Sent:** Thursday, July 25, 2024 12:50 AM  
**To:** Andrew S. Golub  
**Subject:** [Huobi] 回复: Elmowafi v. Yang, et al: Hello, Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of \_Natalia Elmowafi v. Yang, et al\_, ...

##- Please type your reply above this line -##

Dear Customer,

Your request (2023568914) has been updated. You can reply this email for any additional comments, thank you!

Note: Huobi shall never ask you for your password or verification code of your Huobi account in any case.

---

### WBCCYC–Kevin (HTX)

25 July 2024, 13:50 GMT+8

Dear Customer,

Thank you for contacting HTX Customer Service Center.

This e-mail is in response to your below questions:

Hello, we currently only support handling issues raised by platform users. Regarding your feedback, please contact our legal email address [regulatory@huobi.com](mailto:regulatory@huobi.com), and the relevant specialist will handle it for you as soon as possible. Thank you for your support and understanding.

If there is any other questions, please feel free to reply us, or mail to [htxsupport@htx-inc.com](mailto:htxsupport@htx-inc.com), we will reply you within 24 hours. There will be a Customer Satisfaction Survey sent to you later for my service, I would highly appreciate it if you could take a few minutes to complete it, thank you!

Best Regards,

HTX Customer Service Center

---

### WBGXCA–Cori (HTX)

25 July 2024, 10:22 GMT+8

---

Dear Customer,

Thank you for contacting HTX Customer Service Center.

Sorry for the inconvenience caused to you. We have escalated your problem to the relevant support team and will reply to you if there is any new feedback.

If you have any questions or supplements, please send an email to [htxsupport@htx-inc.com](mailto:htxsupport@htx-inc.com), You can also reply based on this conversation, and we will answer your questions within 24 hours. Thank you for your understanding and cooperation!

Best Regards,

HTX Customer Service Center

---

**Andrew S. Golub**

25 July 2024, 09:43 GMT+8

Elmowafi v. Yang, et al:

Hello,

Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of *Natalia Elmowafi v. Yang, et al.*, Case No. 2024-46570, in the 334<sup>th</sup> Judicial District Court of Harris County, Texas. Please find attached a Temporary Restraining Order entered this afternoon by the Court. Please note that the TRO freezes and enjoins the withdrawal, transfer, sale, encumbrance, or alteration of the cryptocurrency in a certain specific wallet address at HTX. The address can be found on Exhibit A to the attached TRO.

I ask that you confirm receipt of the TRO and that you immediately freeze the referenced wallet address (in any event within 24 hours of the time of this email).

Best regards,

Andrew Golub





DOW GOLUB REMELS & GILBREATH, PLLC  
ATTORNEYS AT LAW

Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC  
2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)



Attachment(s)  
[2024.07.24 TRO Granted\[16\].pdf](#)

This email is a service from HTX. Delivered by [Zendesk](#)

## Brenda Castillo

---

**From:** Support <support@huobi.com>  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** Andrew S. Golub  
**Subject:** [Request received] Elmowafi v. Yang, et al: Hello, Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of \_Natalia Elmowafi v. Yang, et al\_, ...

## - Please type your reply above this line -##

Dear Customer,

Your request (2023568914) has been received and is being reviewed by our support staff. If there is any additional comments, please reply to this email.

Note:

1. Huobi shall never ask you for your password or verification code of your Huobi account in any case.
2. If you have any other questions, please send an email to support@huobigroup.com or submit a ticket in Huobi website.

This email is a service from HTX. Delivered by [Zendesk](#)

## Brenda Castillo

---

**From:** Support <support@huobi.com>  
**Sent:** Wednesday, July 24, 2024 8:43 PM  
**To:** Andrew S. Golub  
**Subject:** [Request received] Elmowafi v. Yang, et al: Hello, Along with Geoffrey A. Berg, I represent Natalia Elmowafi in the matter of \_Natalia Elmowafi v. Yang, et al\_, ...

## - Please type your reply above this line -##

Dear Customer,

Your request (2023568914) has been received and is being reviewed by our support staff. If there is any additional comments, please reply to this email.

Note:

1. Huobi shall never ask you for your password or verification code of your Huobi account in any case.
2. If you have any other questions, please send an email to support@huobigroup.com or submit a ticket in Huobi website.

This email is a service from HTX. Delivered by [Zendesk](#)

## Brenda Castillo

---

**From:** Bybit Support <support@bybit.com>  
**Sent:** Tuesday, July 30, 2024 11:56 PM  
**To:** Andrew S. Golub  
**Subject:** RE: Elmowafi v. Yang, et al



Dear Sirs/Madams,

Thank you for contacting us.

Kindly provide the wallet address in Excel file or Text format in order for us to conduct an internal check. Kindly note that our company is also bound by the laws and would like to accommodate the legal request whenever possible if appropriate procedure is in place.

Please be advised that when we support a request, we act purely on a voluntary basis and in the spirit of preventing financial crime. Nothing from our co-operation shall be construed as subjecting ourselves to your jurisdiction.

Should you need further assistance, please do not hesitate to contact us.

With warmest regards  
Bybit Support | support@bybit.com



# BYBIT



## Brenda Castillo

---

**From:** Andrew S. Golub  
**Sent:** Wednesday, July 31, 2024 9:46 AM  
**To:** Bybit Support  
**Cc:** Geoffrey Berg; Frank Partnoy  
**Subject:** RE: Elmowafi v. Yang, et al  
**Attachments:** ByBit Excel File Elmowafi.xlsx; 2024.07.30 Order Extending TRO.PDF

Thank you for your prompt response. We understand that you are acting purely on a voluntary basis and in the spirit of preventing financial crime, and we further understand your point about jurisdiction. We appreciate your efforts.

Attached is the requested Excel file. **Please note that there are only two wallets to freeze.**

The Excel file highlights three straightforward pieces of information in yellow. Once the wallets are frozen in compliance with the order of the District Court of Harris County, Texas, please confirm to us that you have done so, advise us of the date of the freeze, and let us know the type and amount of cryptocurrency in the wallets. This is the only information we need at this point. We would be grateful if you could provide it to us within 48 hours.

To facilitate further communication, could you please provide a direct point of contact within your legal or compliance department? Our colleague, Frank Partnoy, is eager to discuss additional details of this case and the significant likelihood of other upcoming litigation involving similar matters and wallet freezes.

Finally, I am also attaching an order entered yesterday by the Harris County court further extending its injunction and resetting the temporary injunction hearing.

We appreciate your cooperation in this matter and look forward to your further communication.

Best regards,

Andrew Golub



DOW GOLUB REMELS & GILBREATH, PLLC  
ATTORNEYS AT LAW

Andrew S. Golub  
Dow Golub Remels & Gilbreath, PLLC

2700 Post Oak Blvd., Suite 1750  
Houston, Texas 77056  
713-526-3700 (o)  
713-526-3750 (fax)  
[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)

---

**From:** Bybit Support <[support@bybit.com](mailto:support@bybit.com)>  
**Sent:** Tuesday, July 30, 2024 11:56 PM  
**To:** Andrew S. Golub <[asgolub@dowgolub.com](mailto:asgolub@dowgolub.com)>  
**Subject:** RE: Elmowafi v. Yang, et al



Dear Sirs/Madams,

Thank you for contacting us.

Kindly provide the wallet address in Excel file or Text format in order for us to conduct an internal check. Kindly note that our company is also bound by the laws and would like to accommodate the legal request whenever possible if appropriate procedure is in place.

Please be advised that when we support a request, we act purely on a voluntary basis and in the spirit of preventing financial crime. Nothing from our co-operation shall be construed as subjecting ourselves to your jurisdiction.

Should you need further assistance, please do not hesitate to contact us.

With warmest regards  
Bybit Support | [support@bybit.com](mailto:support@bybit.com)

# BYBIT





No. 2024-46570

Pgs-5

NATALIA ELMOWAFI, on behalf of  
Herself and all others similarly situated,

Plaintiff,

V.

CHRIS YANG and JOHN DOES 1-25,

Defendants.

§  
§  
§  
§  
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§  
§  
§  
§

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

334<sup>th</sup> JUDICIAL DISTRICT

XTROX  
CASO

**TEMPORARY RESTRAINING ORDER AGAINST  
CHRIS YANG AND JOHN DOES 1-25**

On this day, the Court considered Plaintiff Natalia Elmowafi's *ex parte* application for temporary restraining order. Plaintiff appeared through her attorney of record and presented the application. The application was conducted on an *ex parte* basis pursuant to TEX.R.CIV.P. 680.

The Court, having read and considered Plaintiff's verified *ex parte* application for temporary restraining order and *ex parte* motion to extend temporary restraining order, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiff will probably recover from Defendants.
2. Harm to Plaintiff is imminent, and if the Court does not issue the temporary restraining order ("TRO") she will be irreparably injured because Defendants will transfer her money, cryptocurrency, assets, or other property to unknown and untraceable locations, causing irreparable injury to Plaintiff.
3. Plaintiff has demonstrated to the satisfaction of this Court that she will suffer immediate and irreparable harm for which she has no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiff.
4. Plaintiff has alleged, and the Court finds that she has a substantial likelihood of recovery for, the theft of her cryptocurrency assets as described in Exhibit A. The Court further finds

that issuance of this TRO on an ex parte basis is necessary to prevent the Defendants from transferring, dissipating, or hiding the cryptocurrency assets described in Exhibit A hereto.

5. Exhibit A to this order is a list of cryptocurrency wallets – digital locations holding keys to the assets belonging to the plaintiff and putitive class members. Exhibit A is incorporated as if fully set out herein.

The Court further finds that a TRO was granted in this matter on July 24, 2024 and the Plaintiff posted bond in the amount of \$1,000 on July 25, 2024. That bond serves as bond for this extension of the TRO. It is further ORDERED that:

(1) Defendants, non-parties Binance Holdings Limited (“Binance”); OKCoin USA Inc., OKCoin Europe LTD, OKX Bahamas FinTech Company Limited, OKX Hong Kong FinTech Company Limited, OKX Serviços Digitais Ltda., OKX SG Pte. Ltd., OKX Australia Pty Ltd, Aux Cayes FinTech Co. Ltd. (“OKX”); Bybit Fintech Limited (“ByBit”); Mek Global Limited, Phoenix, Fin PTE Ltd., Flashdot Limited, and Peken Global Limited (collectively doing business as “KuCoin”); Blofin Technology Limited (“BloFin”); and Huobi Global Limited (“HTX”), and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, affiliates, joint venturers, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the “Enjoined Parties”), are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets identified in Exhibit A of this Order, whether such property is located inside or outside of the United States of America.

(2) Following the actions taken in paragraph (1), above, Plaintiff’s attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiff’s Verified Original Class Action Petition, Application for Temporary Restraining Order, Temporary, and Permanent Injunctions (“Petition”), and the prior Temporary Restraining Order to be served upon

the person or persons controlling the wallets identified in Exhibit A of this Order via a special purpose token or similar device delivered into each of the wallets identified in Exhibit A, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff's counsel, counsel's investigators, or others working on their behalf, that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on the hyperlink. This process shall constitute actual notice of this Order and sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibit A of this Order

(3) Proof of such service shall be filed with the Court prior to hearing on Plaintiff's application for temporary injunction.

(4) Binance, OKX, ByBit, KuCoin, BloFin, HTX, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, affiliates, joint venturers, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with any of the wallet addresses identified in Exhibit A of this Order, including Defendant Chris Yang, and provide counsel for Plaintiff a copy of such notice.

It is further ORDERED that:


Plaintiff's application for temporary injunction is set for hearing on the docket of the 334<sup>th</sup> District Court of Harris County, Texas, 201 Caroline, 14<sup>th</sup> Floor, Houston, Texas 77002 on the 12th day of August, 2024 at 1:00 o'clock p.m. At that hearing, Plaintiffs are permitted to present the testimony of Charles Zach by Zoom or other electronic means via a link which will be provided by the Court in advance of the hearing.

As described above, notice was not provided to Defendant prior to issuance of this Order either because their identities have not yet been ascertained or because this Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Exhibit A of this Order. Notice to Defendants would be fruitless.

This order is entered on July 30, 2024 at 11:08 a.m.

This order expires 14 days from the date of entry or on the 12th day of August, 2024, whichever comes later.

Signed:  
7/30/2024  
11:09 AM



DATE

JUDGE PRESIDING

Unofficial Copy Office of Marilyn Burgess District Clerk



**Exhibit A**

**Binance**

0x6E031365EBa4A48E47015aF708c943c2F119C52b  
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804  
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B  
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC  
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**OKX**

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0xdA22870E0Bd87133250fbC319476E278D7af93c2  
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

**ByBit**

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**KuCoin**

0xCB63262C69aa7CBCe8E128F746D75DEf6B59dDA3

**BloFin**

0xE385be9087900D61db242d6776A1468Bc3EfebC5

**HTX**

1MspmvmHMLA2y841xapZcCEoFHiwG1yep

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**ByBit Wallet Address**

0x64fA177058113A5D668A4a33809514740AB20a57  
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

<b><u>Date of Freeze</u></b>	<b><u>Type of Cryptocurrency</u></b>	<b><u>Current Amount</u></b>



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this November 19, 2024

Certified Document Number: 115678462 Total Pages: 66

Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 51.301 and 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**