

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 \$ _____ 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 ____ District Court of Harris County, Texas, 201 Caroline, ____ Floor, Houston, Texas 77002 on the _____ day of _____, 2024 at ____ o'clock ____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 _____ at __:__. m.

This order expires on the _____ day of _____, 2024.

DATE JUDGE PRESIDING

Exhibit A

Binance

0x6E031365EBa4A48E47015aF708c943c2F119C52b
0xe4CAC07aaba8e667Ef8413aFDE82cdA897a80804
0x270Cb3c9869A2A09C23b8E0B838501724DAE5C9B
0xc70b18eAaa79f87E79deB79a9f6e2886CA7aEDbC
0xA66d89F035756F98FF9aC4a3b48e1E5fdE086E26
0x28E6d72063A5B9B26173F81609D07aF899682f7F
0x1F7C1deaDfB8FA8f5CD9A42cf34C70327c19C420
0xEeF5E766036AF94C5599C1025774706706F5B7ea
0x3Bf212B83c37A33fC4F2aF3f8fBDeBE25D4118F6
0x723a01d4344d97b0Cf937eEc599AFF717028108d
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0xd31734Cdeb17aE29Dfe161b1EF729e4611047E19
0x7db44943441A61Fe5359bea8c7b344f4Cc663Ca1
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15Q1cvrFiG4rDPQa4CPT28v6v142KDtfYM

OKX

0xd49cd43230860f7A244D52FCD78a43CbE068e8Ff
0xa4A76eC9697Be8fcF1fDb907d9e2F64378c83762
0x0eC4E0303897a8E8b477Fdce43e577B3981b5617
0xdA22870E0Bd87133250fbC319476E278D7af93c2
0x5d8814d1268d70d89c2EE8cdF9e14fF64902fcE6

ByBit

0x64fA177058113A5D668A4a33809514740AB20a57
0xf614c8dA40D87B16a04150ec36fBC23e8f303aAf

KuCoin

0xCB63262C60aa7CBCe8E128F746D75DEf6B59dDA3

BloFin

0xE385be9087900D61db242d6776A1468Bc3EfebC5

HTX

1MspmvmHMLA2y841xapZcCEoFHiwG1yeap



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: 11552403 Total Pages: 4

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