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July 29, 2024

Via E-File:

Honorable Judge Dawn Rogers
334th Judicial District Court
204 Caroline Street, 14th Floor
Houston, Texas 77002

Re: Cause No. 2024-46570; *Natalia Elmowafi, on behalf of Herself and all others similarly situated v Chris Yang and John Does 1-25.*; In the 334th Judicial District Court of Harris County, Texas

Dear Judge Rogers:

We represent the Plaintiffs in this matter and write to request an extension of a TRO entered on July 24.

The Defendants are almost certainly members of organized crime based overseas who used aliases when interacting with Plaintiffs. Using WhatsApp and similar encrypted methods of communication, Defendants conned Plaintiffs out of thousands (and perhaps millions) of dollars by having them convert U.S. Dollars into cryptocurrency.

Using extremely sophisticated methods of investigation, Inca Digital, Plaintiffs' investigators, have managed to identify the accounts used by the Defendants to hold pools of stolen crypto assets. If the Defendants are made aware that their accounts have been identified, they will empty those accounts and transfer them somewhere that cannot be found.

On July 24, Plaintiffs sought and were awarded a TRO which directed the legitimate crypto trading platforms on which the identified accounts are located to freeze them. We immediately notified the trading platforms of the order, but have not yet received confirmation from all of them that they have taken that action. If the Defendants are made aware that their accounts have been found before they are frozen, they will empty them and move them out of reach, permanently depriving Plaintiffs of a remedy.

The TRO originally set the TI hearing for August 6, but it was later amended to July 30. We request the Court extend the TRO for two weeks in order to give us more time to confirm the accounts have been frozen, then notify the Defendants of the TI hearing.

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We still plan to appear for tomorrow's hearing unless Your Honor grants this extension ahead of time, in which case we will appear on the new date.

Sincerely,
BERG PLUMMER
JOHNSON & RAVAL, LLP

By: /s/ Geoffrey Berg
Geoffrey Berg

cc: Andrew Golub (e-file)

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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

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Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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