IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

Douglas Bunker
Plaintiff

vs.

Jane Doe, et al.
Defendant

Case Number: 2025 MR 000276

SUBPOENA FOR PRODUCTION OF SPECIFIED DOCUMENTS, OBJECTS OR TANGIBLE THINGS (NOT FOR TRIAL)

TO: B2C2 USA, Inc., United Corporate Services, Inc.
800 North State Street, Suite 304; Dover, DE 19901

You are directed to produce the designated documents, objects or tangible things:

See attached rider. Documents may also be emailed to kirk.watkins@esbrook.com and taras.garapiak@esbrook.com

on the following date: 10/28/26.

Important: Your failure to respond to this subpoena or to comply with Court rules may subject you to punishment for contempt of this Court.

You may comply with this subpoena by mailing legible and complete copies of all specified documents, objects or tangible things requested in this subpoena to the party or law firm whose address appears below. Compliance by mail requires a certification that the documents, objects or tangible things mailed are complete and accurate and constitute good faith compliance with the materials requested by said subpoena. Do not forward materials before date stated on subpoena. **Do not send records to Court or Clerk of the Court.**

Items to be delivered to the following party or law firm at the following address:

Esbrook P.C.
321 N Clark St Ste 1930, Chicago, IL 60654

WITNESS on 09/28/2026

(Seal of Court)

Garapiak
Attorney

Name: Taras Garapiak
Attorney for: Plaintiff
ARDC #: 6351507

Street Address: 321 N Clark St Ste 1930
City, State, Zip: Chicago, IL, 60654
Phone number: (312) 319-7680
Email: taras.garapiak@esbrook.com

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

Douglas Bunker, on behalf of himself and all others similarly situated Plaintiff v. Jane Doe, et al. Defendants	Case No. 2025 MR 000276 Honorable Bennett Braun

RIDER TO SUBPOENA IN A CIVIL MATTER FOR PRODUCTION OF DOCUMENTS TO B2C2

Pursuant to the Subpoena to which this Rider is attached, B2C2 USA, Inc. ("B2C2") is commanded to provide the following documents to the aforementioned counsel for Plaintiff Douglas Bunker in the method set forth in the Subpoena, and in accordance with the Definitions and Instructions in this Rider, no later than October 28, 2026.

DEFINITIONS

The following definitions shall apply to these Requests:

1. "Persons" or "Entities" means each and every individual, corporation, partnership, joint venture, social or political organization or any other entity, whether real or judicial or incorporated or unincorporated, encompassed within the usual and customary meaning of "person" or "entity," or otherwise encompassed within this definition.

2. "Communicate" or "Communication" means and includes every manner or means of disclosure, transfer, or exchange of information, whether done orally or in writing, face-to-face, by telephone, telecopier, mail, e-mail, facsimile, personal delivery, overnight delivery, or otherwise.

3. "Document" or "Documents" means every original (and every copy of any original or copy which differs in any way from any original), every writing or recording of every kind or description, whether handwritten, typed, drawn, sketched, printed, or recorded by any physical, mechanical, magnetic, photographic, phonographic, electronic, or electrical means whatsoever, including without limitation, books, records, papers, pamphlets, brochures, circulars, advertisements, specifications, blueprints, maps, plats, surveys, drawings, sketches, graphs, charts, plans, laboratory or engineering reports, correspondence, communications, telegrams, memoranda, notes, notebooks, worksheets, reports, lists, analyses, summaries, ledgers, accounts, audits, inventories, tax returns, financial statements, profit and loss statements, cash flow statements, balance sheets, annual or other periodic reports, prospectuses, registrations, solicitations, minutes, stock ledgers, stock certificates, licenses, permits, calendars, appointment books, diaries, telephone bills and any other call records, expense reports, commission statements, itineraries, agendas, payroll records, checkbooks, canceled checks, receipts, contracts, agreements, instruments, assignments, applications, offers, acceptances, proposals, financing statements, documents of title, appraisals, purchase orders, invoices, bills of lading, written memorializations of oral communications, forecasts, photographs, photographic slides or negatives, films, filmstrips, tapes, recordings, electronic mail messages, text messages, instant messages, slack messages, hard disks, floppy disks, compact disks, magnetic tapes, computer tapes, any other type of computer media, and computer memory. This definition of "document" or "documents" includes electronic data in all its forms, including, but not limited to, information stored or maintained on, or which could be reproduced from, microfilm, computer printout, computerized backup media, cloud storage, or similar means.

4. The term "ESI" means any electronically stored documents and information – including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations – stored in any medium from which information can be obtained either directly, or, if necessary, after translation by the responding party into a reasonably usable form.

5. The term "metadata" means the electronic information describing the history, tracking, or management of an electronic document. Metadata may include (but shall not be limited to) the name of the file creator, the name of the last editor, the number of times printed, the number of revisions, any deleted text, document comments, and the name of the document file.

6. "Relating to," "concerning," and/or "regarding, or any form thereof, means directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon a stated subject matter.

7. The words "and" and "or" shall be construed both conjunctively and disjunctively. The singular shall be deemed to refer to the plural, and vice versa.

8. "You" or "B2C2" shall mean B2C2 USA, Inc.

9. "Plaintiff" shall mean Douglas Bunker.

10. "Frozen Wallet" shall mean the virtual currency address for any cryptocurrency wallet identified in Appendix A to this Rider.

11. "Associated Wallets" shall mean any additional virtual currency addresses and/or accounts for cryptocurrency wallets linked to or associated with any person or entity that owns or controls, or has ever owned or controlled, one or more Frozen Wallets.

INSTRUCTIONS

1. Each Request below is to be construed and responded to separately and independently and is not to be referenced to any other Request for purposes of limitation or exclusion.

2. These Requests are continuing and require prompt supplemental responses if, between the date hereof and the conclusion of this matter, additional Documents and Communications responsive to these Requests become known or available to You.

3. The Documents and Communications requested herein are to be produced as they are kept in the usual course of business, organized and labeled to correspond to the numbered paragraphs and/or categories of particular requests. If responsive documents are kept in electronic format, such documents shall be produced in electronic format, forensically collected to preserve metadata.

4. In construing these Requests, the following rules shall apply:

a. The connectives "and," "or," and "and/or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed as being outside of its scope.

b. "Any" as used herein includes the word "all," and the word "all" as used herein includes the word "any."

c. "All" shall be construed to include the word "each," and the word "each" shall be construed to include the word "all."

d. "Each" as used herein includes the word "every," and the word "every" as used herein includes the word "each."

e. "Including" shall mean "including, but not limited to."

f. The singular shall include the plural and vice versa.

g. The use of masculine, feminine, or neutral genders shall include each gender, as appropriate in context.

5. In the event that You do not have Documents or Communications within Your possession, custody, or control that are responsive to the Requests set forth below, Your response to such Request shall specifically state that You have no responsive Documents or Communications within Your possession, custody, or control, and shall state what efforts were made to obtain the unavailable material, regardless of whether or not You also interpose any objection to such Request.

6. A Request for Documents concerning any topic includes, but is not limited to, Documents constituting Communications on the described topic, and vice versa.

7. Unless otherwise indicated, the time period for these Requests is January 1, 2024 through the present.

REQUESTS

1. Documents sufficient to identify the Persons or Entities that own, control, or have ever owned or controlled any of the Frozen Wallets, including the following information:

   a. legal names;

   b. dates of birth (for individuals) or date of formation (for entities);

   c. residential and/or business addresses;

   d. email addresses;

   e. phone numbers;

   f. government-issued identification used for account verification; and

   g. any other identifying information collected under applicable Know Your Customer (KYC) procedures.

2. Documents sufficient to show the current balance of each Frozen Wallet, including a breakdown by cryptocurrency type, amount, and USD equivalent, as of the date of production.

3. Transaction records sufficient to show all cryptocurrency deposits into each Frozen Wallet from January 1, 2024 to present, including the following for each transaction:

   a. date and time;

   b. amount and cryptocurrency type;

   c. originating wallet address;

   d. originating account holder (including names and contact information); and

   e. transaction hash or blockchain ID.

4. Transaction records sufficient to show all cryptocurrency withdrawals and/or transfers from each Frozen Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. destination wallet address;

d. destination account holder (including names and contact information); and

e. transaction hash or blockchain ID.

5. Documents sufficient to identify any and all Associated Wallets, including the following information for each Associated Wallet:

a. internal account IDs;

b. customer profiles;

c. current balance;

d. deposit transaction records;

e. withdrawal transaction records;

f. transfer transaction records.

6. Documents sufficient to show the current balance of each Associated Wallet, including a breakdown by cryptocurrency type, amount, and USD equivalent, as of the date of production.

7. Transaction records sufficient to show all cryptocurrency deposits into each Associated Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. originating wallet address;

d. originating account holder (including names and contact information); and

e. transaction hash or blockchain ID.

8. Transaction records sufficient to show all cryptocurrency withdrawals and/or transfers from each Associated Wallet from January 1, 2024 to present, including the following for each transaction:

a. date and time;

b. amount and cryptocurrency type;

c. destination wallet address;

d. destination account holder (including names and contact information); and

e. transaction hash or blockchain ID.

9. All internal investigation notes, compliance alerts, suspicious activity reports (SARs), fraud alerts, or other internal memoranda referring to any Frozen Wallet or Associated Wallet and/or any Person or Entity that owns, controls, or has ever owned or controlled such wallets.

Date: September 28, 2026

Respectfully submitted,

/s/ Taras Garapiak

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Counsel for Plaintiff Douglas Bunker

Appendix A — Frozen Wallets

Exchange	Wallet Address
B2C2	0xa29E963992597B21bcDCaa969d571984869C4FF5