

At IAS Part \_\_\_\_ of the Supreme Court  
of the State of New York, held in and  
for the County of New York, at the  
Courthouse, 60 Centre Street, New  
York, New York 10007 on this \_\_\_\_ day  
of \_\_\_\_\_ 2024

*PRESENT:*

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

*JSC*

ANDREW CHAIT, on behalf of himself  
and all others similarly situated,

Plaintiff,

-against-

WENDY LEE, EILEEN BURBRIDGE,  
MARY SCOTT, VERNA, ETTIE LEE,  
KEIKO FUJIWARA and JOHN DOE NOS. 1-25,

Defendants.

Index No. \_\_\_\_\_

**[PROPOSED] ORDER**  
**TO SHOW CAUSE**

Upon the attached Affirmation of Charles Zach, dated October 23, 2024; and  
Memorandum of Law in Support dated October 23, 2024, and all prior pleadings, papers and  
proceedings heretofore had herein, and good cause being alleged therefore,

LET Defendants Wendy Lee, Eileen Burbridge, Mary Scott, Verna, Ettie Lee, Keiko  
Fujiwara, and John Doe Nos. 1-25 (collectively, "Defendants") (together, "Defendants") show  
cause before this Court, in Room \_\_\_\_, 60 Centre Street, New York, New York 10007, on  
\_\_\_\_\_, 2024, at \_\_\_\_\_ a.m./p.m., or as soon thereafter as counsel may be heard, why  
an order should not be issued permitting Class Plaintiff Andrew Chait to temporarily file under  
seal unredacted copies of:

- (a) The Complaint dated October 23, 2024, and its Appendix A;
- (b) Class Plaintiff's Affirmation in support of his proposed  
Order to Show Cause for a preliminary injunction and a  
temporary restraining order, dated October 22, 2024;

*RB*

- (c) ~~The Affirmation of Charles Zach in support of Plaintiff's proposed Order to Show Cause for a preliminary injunction and a temporary restraining order, dated October 23, 2024,~~ RB
- (d) ~~The Memorandum of Law in Support of Class Plaintiff's proposed Order to Show Cause for a preliminary injunction and a temporary restraining order;~~ RB

and publicly file redacted versions of those documents to the extent practicable, until such time as the Court rules on Plaintiff's application for a temporary restraining order freezing certain cryptocurrency held at the wallet addresses listed in Appendix A to the Complaint in this action (the "Deposit Wallets") and any order of the Court freezing such wallets is implemented, and it is further

*BEFORE THE JUSTICE TO BE ASSIGNED, THE CLERK OF THE COURT IS DIRECTED TO RESTRICT*  
ORDERED that, pending a hearing and determination of this Order to Show Cause, *EXCEPT AS TO OR DEFENDANTS* access to the aforementioned documents ~~is restricted to~~ Plaintiff's attorneys and authorized court personnel; and it is further

*HON. JAS A. KINGO J.S.C.*  
OCT 24 2024  
ORDERED that Mandel Bhandari LLP, Plaintiff's attorneys, shall cause to be served a copy of this Order to Show Cause, together with a copy of the papers upon which it is based, on or before \_\_\_\_\_, 2024, upon the person or persons controlling the Deposit Wallets via the Input Data Message ("IDM") process by which a message will be sent to the Deposit Wallets using the Input Data field on a transaction on the Ethereum blockchain. The message will contain a hyperlink (the "Service Hyperlink") to a website Mandel Bhandari LLP will cause to be created, wherein Mandel Bhandari LLP shall cause to be published this Order to Show Cause and all papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute good and sufficient service for purposes of jurisdiction under New York law on the person or persons controlling the Deposit Wallets; and it is further

ORDERED, that opposing papers, if any, to this motion shall be served on Mandel Bhandari LLP, 80 Pine Street, 33<sup>rd</sup> Floor, New York, NY 10005, so as to be received on or before \_\_\_\_\_, 2024, and reply papers, if any shall be filed and served in the manner set forth above so as to be received on or before \_\_\_\_\_, 2024.

Dated: New York, New York

\_\_\_\_\_, 2024

ENTER:  
ORDERED

\_\_\_\_\_  
J.S.C.