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YOUNES YOUNES
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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF LOS ANGELES

14 YOUNES YOUNES, on behalf of himself
and all others similarly situated,

15 Plaintiff,

16 v.

17 ELVIRA TAYLOR and DOES 1 through 200,
18 inclusive,

19 Defendants.

Case No. 24STCV12520

STATEMENT REGARDING CLASS NOTICE

[Notice of Motion, Memorandum of Points and
Authorities, Proposed Notice of Pending Class
Action, Declarations of Younes Younes, Adam
Zarazinski, Shaun Martin, and Nicole G. Malick,
and Proposed Order Filed Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

Date: May 7, 2025
Time: 11:00 A.M.
Place: 312 N. Spring Street,
Los Angeles, CA 90012
Dept. 6

Action Filed: May 17, 2024
Trial Date: None

1 Plaintiff Younes Younes submits this statement pursuant to California Rule of Court 3.766
2 regarding class notification.

3 **1. Necessity of Notice**

4 Plaintiff, on behalf of the Class, proposes that notice be given to the unnamed members of the
5 class in the manner described in Section 3 below in order to inform Class Members of their rights and
6 options in this action. The notice will explain that Class Members may participate in the case, exclude
7 themselves from the Class, or take no action. Providing such notice will attempt to ensure that all
8 potential Class Members are aware of the certified Class, their legal rights, and how this action may
9 impact their interests.

10 **2. Right to Opt Out of the Action**

11 The proposed Notice explains to Class Members that may exclude themselves from the Class
12 by following the opt-out process described in the proposed Notice. Those who choose to opt out will
13 not be bound by any judgment or settlement in this case and will not be eligible to recover any funds
14 obtained through this action. Class Members who wish to opt out of this action may do so by mailing
15 a written request for exclusion to the address provided in the Class Notice.

16 **3. Time and Manner of Notice**

17 Notice will be provided through the most practically available methods intended to effectively
18 reach affected individuals and inform them of their rights and options. Plaintiff, with support from
19 Inca Digital, will collaborate with the two cryptocurrency exchanges identified in the Complaint –
20 Binance and OKC – each of which maintains Know-Your-Customer (KYC) data for the account
21 holders whose cryptocurrency addresses sent funds into the wallets identified in this action. These
22 account holders are individuals whose assets were misappropriated through the same fraudulent
23 scheme and are potential Class Members. Plaintiff’s counsel will provide each exchange with detailed
24 transaction data — including originating wallet addresses and associated transaction hashes — to assist
25 in identifying and notifying these affected individuals.

26 Where contact information cannot be obtained through exchanges, Plaintiff’s counsel and Inca
27 Digital will employ targeted on-chain notifications by sending transaction-linked alerts directly to
28

1 impacted wallets. This method will ensure that Class Members will be informed of their rights in this
2 matter even when other channels are unavailable.

3 **4. Responsibility for Costs of Notice**

4 Plaintiff proposes to advance the initial costs of providing the proposed Notice to the Class
5 Members but that Defendants ultimately bear those costs in the event of a judgment in favor of the
6 Plaintiff and the Class.

7 **5. Estimated Cost of Notice**

8 If Plaintiff's counsel advances costs, the estimated cost is approximately \$75,000, based on
9 anticipated outreach volume, data processing, and other expenses.

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11 Dated: April 7, 2025

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