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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES**

13  
14 YOUNES YOUNES, on behalf of himself  
15 and all others similarly situated,

16 Plaintiff,

17 v.

18 ELVIRA TAYLOR and DOES 1 through  
19 200, inclusive,

20 Defendants.

Case No.: 24STCV12520

**FURTHER STATUS CONFERENCE  
STATEMENT**

Assigned for All Purposes to:  
Judge: The Hon. Elihu Berle

Date: August 28, 2024  
Time: 8:30 a.m.  
Place: 312 N. Spring Street,  
Los Angeles, CA 90012  
Dept. 6

1 Pursuant to the August 6, 2024 Preliminary Injunction Order (the “Preliminary Injunction  
2 Order”), Plaintiff Younes Younes (“Plaintiff”) submits this Further Status Conference Statement  
3 in advance of the Further Status Conference scheduled for August 28, 2024, at 8:30 a.m. The  
4 parties are not filing a joint further status conference statement because, as explained further  
5 below, after Plaintiff’s counsel served Defendants all documents filed in this matter thus far,  
6 Defendants have not made an appearance or otherwise contacted Plaintiff’s counsel. Thus,  
7 Plaintiff has not been able to meet and confer with Defendants.

8 On May 20, 2024, Plaintiff filed his Verified Complaint on behalf of himself and other  
9 similarly situated victims of Defendants’ “pig butchering” scheme. Plaintiff alleges Defendants,  
10 whose identities are unknown, stole over \$400,000 of electronic cryptocurrency from Plaintiff,  
11 and after exhaustive factual investigation, counsel for Plaintiff identified the electronic “wallets”  
12 in which Defendants have placed these stolen proceeds.

13 On June 11, 2024, Plaintiff filed his *Ex Parte* Application for a Temporary Restraining  
14 Order (“TRO”) and OSC Re: Preliminary Injunction to temporarily seize these proceeds, provide  
15 electronic notice to Defendants, and enable Defendants to challenge this seizure (if they wished)  
16 at a hearing on a motion for a preliminary injunction.

17 On June 14, 2024, this Court ruled on the papers and initially denied the application  
18 without prejudice to filing a noticed motion.

19 On June 18, 2024, Plaintiff filed his *Ex Parte* Application for Reconsideration of the  
20 June 14, 2024 Minute Order. On June 26, 2024, Plaintiff’s counsel appeared before this Court for  
21 a hearing on this matter.

22 On June 27, 2024, this Court issued an Order Granting *Ex Parte* Application for  
23 Reconsideration and Granting Order to Show Cause for Preliminary Injunction and Temporary  
24 Restraining Order (the “TRO Order”). The TRO Order explained entry of the TRO without prior  
25 notice to Defendants was appropriate given the nature of the cryptocurrency theft at issue, the  
26 alleged use of fictitious identities by the Defendants, and the fact that the cryptocurrency assets  
27 at issue may be instantly transferred to locations beyond the reach of this Court were Defendants  
28 notified in advance of the potential seizure of this cryptocurrency.

1 Per the TRO Order, Plaintiff was required to serve a copy of the TRO Order, and all  
2 supporting documents filed in connection therewith, as well as the Verified Complaint,  
3 summons, and all other orders of the Court in this matter, within five days of the issuance of the  
4 TRO Order on Defendant Elvira Taylor and on the owners of each of the wallets identified in  
5 Appendix A of the TRO Order, Binance Holdings Ltd., and OK Group, and/or any of their  
6 agents, servants, employees, attorneys, affiliates, partners, successors, assigns, subsidiaries, or  
7 any other persons through which they act, or who act in active concert or participation with any  
8 of them (collectively, the “Enjoined Parties”), through a special purpose token or similar device  
9 delivered into each the wallets identified in Appendix A of the TRO Order. Each of these service  
10 tokens was to contain a hyperlink to a website maintained by Plaintiff’s counsel that included the  
11 TRO Order and all papers upon which it is based, the Verified Complaint and summons, and a  
12 hyperlink that includes a mechanism to track when a person clicks on the hyperlink. This process  
13 was to constitute actual notice of the TRO Order and sufficient service of process on Defendants  
14 and the person or persons controlling the corresponding wallet addresses identified in Appendix  
15 A of the TRO Order. Per the TRO Order, Plaintiff was to file proof of such service with the  
16 Court no later than July 11, 2024.

17 The Court set a hearing for July 18, 2024<sup>1</sup> at 11:00 a.m. to show cause why a preliminary  
18 injunction should not be ordered restraining the Enjoined Parties. Any papers opposing the Order  
19 to Show Cause or preliminary injunction were to be filed with the Court and served upon  
20 Plaintiff by the Enjoined Parties no later than July 11, 2024. Reply papers by Plaintiff, if any,  
21 were to be filed with the Court and served on the Enjoined Parties no later than July 15, 2024.

22 On June 28, 2024, Plaintiff’s counsel contacted OK Group and Binance Holdings Ltd. to  
23 seek a voluntary freeze of the wallets and sent a courtesy copy of the TRO Order. After OK  
24 Group and Binance Holdings Ltd. confirmed the wallets were frozen, Plaintiff’s counsel served  
25 the TRO Order, all supporting documents filed in connection therewith, the Verified Complaint,  
26 summons, all other orders of the Court in this matter, and all other documents filed in this matter  
27 thus far on OK Group on July 2, 2024 and on Binance Holdings Ltd. on July 4, 2024. Plaintiff’s

28 <sup>1</sup> As explained further below, the hearing was continued to August 6, 2024.

1 counsel followed the specific process outlined above and in the TRO Order. Per the TRO Order,  
2 completion of this process constituted actual notice of the TRO Order and sufficient service of  
3 process on Defendants and the person or persons controlling the corresponding wallet addresses  
4 identified in Appendix A of the TRO Order. Plaintiff filed a proof of service on July 11, 2024  
5 and a supplemental proof of service on July 15, 2024.

6 Due in part to technical issues the Court faced, the July 18, 2024 hearing to show cause  
7 why a preliminary injunction should not be ordered restraining the Enjoined Parties was  
8 continued to August 5, 2024 and then to August 6, 2024. During the August 6, 2024, the Court  
9 issued the Preliminary Injunction Order. On the same day, as required by the court, Plaintiff  
10 posted with the Court a cash undertaking of one thousand dollars (\$1,000.00). OK Group and  
11 Binance Holdings Ltd. received the Preliminary Injunction Order on August 6, 2024 by email.  
12 Plaintiff served the Preliminary Injunction Order on the Enjoined Parties on August 22, 2024.

13 To date, while OK Group and Binance Holdings Ltd. confirmed they froze the wallets  
14 identified in Appendix A of the TRO Order, Defendants have not made an appearance or  
15 otherwise contacted Plaintiff's counsel. Consequently, Plaintiff has not been able to meet and  
16 confer with Defendants regarding the topics outlined in the June 6, 2024 Minute Order and Initial  
17 Status Conference Order or any other issues in this case.

18  
19 Dated: August 23, 2024

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21 

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