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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
6/11/2024 8:42 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By D. Jackson Aubry, Deputy Clerk

5 SHAUN P. MARTIN (SBN 158480)  
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10 *Counsel for Plaintiff Younes Younes*

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

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

17 Plaintiff,

18 v.

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

21 Defendants.

Case No. 24STCV12520

**DECLARATION OF SHAUN MARTIN  
IN SUPPORT OF PLAINTIFF'S EX  
PARTE APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER AND OSC RE:  
PRELIMINARY INJUNCTION**

Assigned for All Purposes to:  
Judge: The Hon. Elihu Berle  
Date: June 12, 2024  
Time: 8:30 a.m.  
Place: 312 N. Spring Street, Los  
Angeles, CA 90012, Dept. 6

1 I, Shaun Martin, declare under penalty of perjury as follows:

2 1. My name is Shaun Martin. I am over 18 years of age, of sound mind, and  
3 am competent to make this Declaration, and am counsel for Plaintiff in this action. The  
4 evidence set forth in the foregoing Declaration is based upon my personal knowledge  
5 unless expressly stated otherwise, and if called and sworn as a witness, I could and  
6 would testify to each of the facts set forth herein.

7 2. Plaintiff has not previously requested any provisional relief in this action,  
8 and has exercised due diligence in the investigation and prosecution of this matter,  
9 including but not limited to the extensive investigation and identification of the wallets  
10 identified in the Proposed Order and in the supporting documents filed in connection  
11 with the present request for provisional relief.

12 3. Counsel for Plaintiff is willing and able to prepare and deliver the notice  
13 described in the Proposed Order.

14 4. Despite substantial investigation, Plaintiff cannot discover the actual  
15 identities and locations of the Defendants in this matter, due to their use of fictitious  
16 names and their desire to keep their identities unknown. The manner of service proposed  
17 in the Proposed Order is the best available means to accomplish actual notice of this  
18 action and the requested provisional relief herein.

19 I declare under penalty of perjury under the law of the State of California that the  
20 foregoing is true and correct.

21 Executed this 6th day of June, 2024, in San Diego, California

22  
23   
24 Shaun P. Martin

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