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Attorneys for Plaintiff  
YOUNES YOUNES

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

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

Plaintiff,

v.

ELVIRA TAYLOR and DOES 1 through 200,  
inclusive,

Defendants.

Case No.: 24STCV12520

Hon. Elihu Berle

**[PROPOSED] ORDER TO SHOW  
CAUSE FOR PRELIMINARY  
INJUNCTION AND TEMPORARY  
RESTRAINING ORDER**

Judge: The Hon. Elihu Berle  
Place: 312 N. Spring Street, Los  
Angeles, CA 90012  
Dept. 6

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**IT IS HEREBY ORDERED** that Defendant ELVIRA TAYLOR, Binance Holdings Ltd., and OK Group, and/or any of their agents, servants, employees, attorneys, affiliates, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them (collectively, the “Enjoined Parties”), appear before this Court on \_\_\_\_\_ at \_\_\_\_\_ a.m./p.m. in Department 6, 312 N Spring St, Los Angeles, CA 90012, to show cause why a preliminary injunction should not be ordered restraining the Enjoined Parties as set forth in the Temporary Restraining Order.

**IT IS FURTHER ORDERED** that:

Plaintiff shall serve a copy of this Order to Show Cause for Preliminary Injunction and Temporary Restraining Order and all supporting documents, as well as the Verified Complaint, within five days of the issuance of the Temporary Restraining Order on the Enjoined Parties, including the owners of each of the wallets identified in Appendix A of this Order through a special purpose token or similar device delivered or airdropped into each the wallets identified in Appendix A of this Order, and each of these service tokens will contain a hyperlink to a website maintained by Plaintiff's counsel that will include both this Order and all papers

1 upon which it is based. The hyperlink will include a mechanism to track when a  
2 person clicks on the hyperlink. This process shall constitute actual notice of this  
3 Order and sufficient service on the person or persons controlling the corresponding  
4 wallet addresses identified in Appendix A of this Order.

5 Proof of such service shall be filed with the Court no later than \_\_\_\_\_  
6 days before the hearing on Plaintiff Younes Younes's Order to Show Cause.

7 Any opposing papers shall be filed with the Court and served upon Plaintiff  
8 Younes Younes by the Enjoined Parties no later than \_\_\_\_\_ days before such  
9 hearing date.

10 Any reply papers shall be filed with the Court and served on the Enjoined  
11 Parties by Plaintiff Younes Younes no later than \_\_\_\_\_ days before such  
12 hearing date.

13 The Enjoined Parties are hereby on notice that failure to timely serve and file  
14 an opposition, or failure to appear at the hearing, may result in the imposition of a  
15 preliminary injunction against them pursuant to Section 527 of the California Code  
16 of Civil Procedure.

17 **TEMPORARY RESTRAINING ORDER**

18 **IT IS HEREBY ORDERED** that, pending the hearing on Plaintiff Younes  
19 Younes' application for a preliminary injunction:

20 Defendant ELVIRA TAYLOR, and non-parties Binance Holdings Ltd., and  
21 OK Group, and/or any of their agents, servants, employees, attorneys, affiliates,  
22 partners, successors, assigns, subsidiaries, or any other persons through which they  
23 act, or who act in active concert or participation with any of them, who receive  
24 actual notice of this Order through personal service or otherwise, whether acting  
25 directly or through any trust, corporation, subsidiary, division or other device, or  
26 any of them [(collectively, the "Enjoined Parties")], are hereby temporarily  
27 restrained from withdrawing, transferring, selling, encumbering, or otherwise  
28

1 altering any of the cryptocurrency or assets held in the wallets identified in  
2 Appendix A of this Order, whether such property is located inside or outside of the  
3 United States of America:

4       Plaintiff's attorneys shall cause a copy of this Temporary Restraining Order,  
5 together with a copy of the papers upon which it is based, including the Verified  
6 Complaint, to be served upon the person or persons controlling the wallets  
7 identified in Appendix A of this Order via a special purpose token or similar device  
8 delivered or airdropped into each of the wallets identified in Appendix A of this  
9 Order, and each of these service tokens will contain a hyperlink to a website  
10 maintained by Plaintiff's counsel that will include both this Order and all papers  
11 upon which it is based. The hyperlink will include a mechanism to track when a  
12 person clicks on the hyperlink. This process shall constitute actual notice of this  
13 Order and sufficient service on the person or persons controlling the corresponding  
14 wallet addresses identified in Appendix A of this Order.

15       (2) Binance Holdings Ltd and OK Group, and/or any of their agents, servants,  
16 employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, or any  
17 other persons through which they act, or who act in active concert or participation  
18 with any of them, who receive actual notice of this Order by personal service or  
19 otherwise, are hereby directed, within twenty-four (24) hours of receiving actual  
20 notice of this Order to provide notice of the same to any of their customers  
21 associated with any of the wallet addresses identified in Appendix A of this Order,  
22 including Defendant ELVIA TAYLOR, and provide counsel for Plaintiff a copy of  
23 such notice.

24       **IT IS FURTHER ORDERED** that:

25       This Temporary Restraining Order shall expire on \_\_\_\_\_  
26 unless extended by the Court.

1           The Enjoined Parties are further notified of their right to apply to this Court  
2 for modification or dissolution of this Temporary Restraining Order, if appropriate  
3 and supported by a showing of good cause, on notice or such shorter notice as this  
4 Court may allow.

5           Notice was not provided to Defendant prior to issuance of this Order either  
6 because their identities have not yet been ascertained or because this Court has  
7 determined that providing such notice would cause a likelihood of immediate,  
8 irreparable injury or loss, particularly through the dissipation of the assets listed in  
9 Appendix A of this Order.

10           Pursuant to California Code of Civil Procedure § 527, this Court in its  
11 discretion determines that no bond is required.

12  
13 **IT IS SO ORDERED.**

14  
15 DATED: \_\_\_\_\_

By: \_\_\_\_\_  
Judge of the Superior Court

## APPENDIX A

### OKX

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY
- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

### Binance

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe
- TVBfaX2DF6kBxevEJMegDjXwpY9zQpES57
- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ
- TAwsDzJgxYhsTkrLkkPiFZsZnkcjmhupfW
- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB
- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2
- TYWjiCsJJJ4wAem1unRFybcvQq9ekL8Btv
- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn
- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7
- TYuEjjSM89QJKKKUX3UyY6TxT6QvHzAc37
- TQnKVsgfboAuwepfSwgNxX2pnMgQLVku4h
- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m
- TXYG7jR37cLtNVgSzqiPZwJk9zb7XMqk6e