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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.
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Electronically FILED by
Superior Court of California,
County of Los Angeles
10/23/2024 10:32 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By C. Vega, Deputy Clerk

Case No. 24STCV12520

ASSIGNED FOR ALL PURPOSES TO HON.
ELIHU BERLE

**PLAINTIFF'S STATUS CONFERENCE
REPORT**

Date: October 30, 2024
Time: 10:30 A.M.
Place: 312 N. Spring Street,
Los Angeles, CA 90012
Dept. 6

1 **I. INTRODUCTION**

2 Pursuant to the Court’s August 28, 2024 Minute Order, Plaintiff submits this Status Conference
3 Report to update the Court on (1) contact with Defendants, (2) service on Defendants, (3) the
4 identification and notification of class members, and (4) proposals for moving forward. Since the last
5 status conference, Plaintiff has continued to identify class members, provide notice, and ensure proper
6 service on all Defendants, in compliance with the Court’s directives.

7 **II. CONTACT WITH DEFENDANTS**

8 As of the date of this report, no Defendant has appeared in this action or filed any objection or
9 response. A small number of individuals (outside the United States) have occasionally reached out to
10 Plaintiff’s counsel about a particular frozen account, but none has contested the proceedings. No
11 Defendants have made contact or appeared in this action, demonstrating an unwillingness to engage
12 with the legal process.

13 **III. SERVICE ON DEFENDANTS**

14 Plaintiff has effectuated service on all Defendants in accordance with the Court’s instructions.
15 As ordered, service was conducted using special-purpose tokens delivered to the wallets listed in
16 Appendix A of the Court’s Order. Each service token contained a hyperlink to a website maintained
17 by Plaintiff’s counsel, which provides access to the OSC, TRO, Verified Complaint, summons, and
18 all supporting papers. The website link includes tracking mechanisms to record when recipients access
19 the content. Plaintiff has also coordinated with Binance and the OK Group to assist in notifying the
20 wallet owners of the Court’s orders and the scheduled preliminary injunction hearing.

21 **IV. IDENTIFICATION OF CLASS MEMBERS**

22 Plaintiff, through the assistance of Inca Digital, has identified a series of deposit wallets where
23 misappropriated funds were ultimately transferred. As previously detailed in Plaintiff’s Complaint and
24 Motion for a Temporary Restraining Order and Order to Show Cause, forward-tracing allowed
25 Plaintiff to track the movement of these funds into those specific wallets. To identify class members,
26 Inca Digital is engaged in reverse-tracing to trace the flow of funds back to their originating wallets.
27 This process enables Plaintiff to identify not only the originating wallets but also the associated
28 transaction hashes, which provide critical information for locating the individuals affected by the

1 fraudulent activity. This reverse-tracing analysis provides a set of transaction hashes tied to wallets
2 from which funds were ultimately transferred into the identified deposit wallets.

3 **V. CLASS NOTIFICATION PROCESS**

4 Plaintiff's primary method for notifying class members involves direct coordination with
5 cryptocurrency exchanges. Inca Digital has initiated contact with relevant exchanges where the
6 identified wallets are registered. These exchanges hold the necessary account information, including
7 contact details such as email addresses, which will allow the exchanges to notify potential class
8 members of their inclusion in this action.

9 As part of the notification process, Plaintiff has provided each exchange with a list of
10 transaction hashes associated with their platform, requesting that they inform the individuals linked to
11 these transactions. The exchanges are expected to assist in notifying these individuals, as they are in
12 the best position to communicate with their users securely and efficiently.

13 If an exchange cannot assist with providing sufficient notice, Plaintiff will consider
14 alternatives, including token dropping, publication, and/or posting information online. Token dropping
15 involves sending a digital token directly to each identified wallet. To be effective, token dropping
16 requires the wallet holders to monitor their wallets and take the necessary steps to respond.
17 Additionally, this approach involves substantial logistical coordination, increased costs, and potential
18 security concerns, as it requires tokens to be distributed across multiple wallets individually.
19 Therefore, Plaintiff is focusing on working directly with the exchanges to ensure a more streamlined
20 and effective notification process.

21 **VI. PROPOSALS FOR MOVING FORWARD**

22 Given the absence of responses or objections from Defendants, Plaintiff proposes moving
23 forward with the identification and notification of class members. Plaintiff anticipates pursuing class
24 certification and default judgment as the next steps, subject to the Court's approval.

25 Plaintiff will continue working closely with cryptocurrency exchanges to ensure that class
26 members receive appropriate notice as part of any motion to certify a class.

1 Dated: October 23, 2024

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3  MR

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