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10 Attorneys for Plaintiff  
YOUNES YOUNES

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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

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

16 Plaintiff,

17 v.

18 ELVIRA TAYLOR and DOES 1 through 200  
19 inclusive,

20 Defendants.  
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Case No. 24STCV12520

**DECLARATION OF SHAUN MARTIN IN  
SUPPORT OF PLAINTIFF'S *EX PARTE*  
APPLICATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
CLASS CERTIFICATION HEARING**

[Plaintiff's *Ex Parte* Application, Declaration  
of Albina Giuttari, and Proposed Order Filed  
Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

Date: March 21, 2025  
Time: 8:30 A.M.  
Place: Dept. 6  
312 N. Spring Street,  
Los Angeles, CA 90012

Action Filed: May 17, 2024  
Trial Date: None

1 I, Shaun Martin, declare:

2 1. I am one of the attorneys for Plaintiff in this action. I make the following  
3 declaration based upon my personal and firsthand knowledge, and if called and sworn as a  
4 witness, I could and would testify competently to the facts set forth herein.

5 2. This is a case in which scam artists created a fake online work platform to engage  
6 in “pig butchering” to steal over \$2.9 million in cryptocurrency from approximately 325  
7 unsuspecting victims, including over \$400,000 from the named plaintiff (Mr. Younes) himself.  
8 Plaintiff previously anticipated filing his motion for class certification in early March, but  
9 workload and calendaring issues subsequently interfered with this planned schedule. Among other  
10 things, Plaintiff was required to conduct additional investigation through Inca in order to  
11 effectively trace the flow of funds from the various class members to the particular nodes and  
12 wallets controlled by Defendants.

13 3. Plaintiff has fully prepared, and is able to file and serve today, his motion for class  
14 certification; however, because Rule 3.764 requires that such motions be heard at least 28 days  
15 after filing, Plaintiff respectfully requests that the existing hearing date of April 2, 2025 be moved  
16 to April 29, 2025, or whatever other date is most convenient for this Court, in order to satisfy Rule  
17 3.764.

18 4. Defendants were notified of this *ex parte* request through the method of service  
19 previously authorized by this Court. This method of service was approved by this Court’s June 27,  
20 2024 Order, which authorized service by posting to a website maintained by Plaintiff’s counsel  
21 and by delivering a special purpose token or similar device to Defendants’ wallets containing a  
22 hyperlink directing to the same website. No opposition is expected to either this *ex parte* request or  
23 to the ultimate class certification motion. Defendants have never appeared, and their defaults will  
24 be taken after the motion for class certification is heard.

25 5. Ex parte relief is required because absent a change in the class certification hearing  
26 date, Plaintiff could not file a timely class certification motion that complies with the notice  
27 provisions of Rule 3.764, and absent classwide relief, the 324 unnamed members of the class will  
28 irreparably lose over \$2.5 million in funds that were stolen from them. A regular noticed motion

1 requesting a change in the class certification hearing date would require notice beyond the current  
2 April 2, 2025 date; accordingly, an ex parte motion was necessary.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct.

5 Executed on March 18, 2025.

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Shaun Martin

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