

William A. Delgado (SBN 222666)  
wdelgado@dtolaw.com  
Marisol Ramirez (SBN 307069)  
mramirez@dtolaw.com  
DTO LAW  
601 South Figueroa Street, Ste. 2130  
Los Angeles, CA 90017  
Telephone: (213) 335-6999  
Facsimile: (213) 335-7802

SHAUN P. MARTIN (SBN 158480)  
smartin@sandiego.edu  
5998 Alcala Park, Warren Hall  
San Diego, CA 92110  
Telephone: (619) 260-2347  
Facsimile: (619) 260-7933

Attorneys for Plaintiff  
YOUNES YOUNES

Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
7/11/2024 3:30 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By J. Covarrubias, Deputy Clerk

**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

**INITIAL STATUS CONFERENCE  
STATEMENT**

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

Date: July 18, 2024  
Time: 11:00 a.m.  
Place: 312 N. Spring Street,  
Los Angeles, CA 90012  
Dept. 6

1 Pursuant to the June 6, 2024 Minute Order and Initial Status Conference Order, Plaintiff  
2 Younes Younes (“Plaintiff”) submits this Initial Status Conference Statement in advance of the  
3 Initial Status Conference scheduled for July 18, 2024, at 11:00 a.m. The parties are not filing a  
4 joint initial status conference statement because, as explained further below, after Plaintiff’s  
5 counsel served Defendants all documents filed in this matter thus far, Defendants have not made  
6 an appearance or otherwise contacted Plaintiff’s counsel. Thus, Plaintiff has not been able to  
7 meet and confer with Defendants on any of the matters outlined in the June 6, 2024 Minute  
8 Order and Initial Status Conference Order.

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

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

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

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

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

1 be instantly transferred to locations beyond the reach of this Court were Defendants notified in  
2 advance of the potential seizure of this cryptocurrency.

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

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

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

1 followed the specific process outlined above and in the Order. Per the Order, completion of this  
2 process constituted actual notice of the Order and sufficient service of process on Defendants and  
3 the person or persons controlling the corresponding wallet addresses identified in Appendix A of  
4 the Order. Plaintiff is filing a proof of service concurrently with this Initial Status Conference  
5 Statement.

6 To date, while OK Group and Binance Holdings Ltd. confirmed they froze the wallets  
7 identified in Appendix A of the Order, Defendants have not made an appearance or otherwise  
8 contacted Plaintiff's counsel. Consequently, Plaintiff has not been able to meet and confer with  
9 Defendants regarding the topics outlined in the June 6, 2024 Minute Order and Initial Status  
10 Conference Order.

11  
12 Dated: July 11, 2024

13  
14  MR

15 Shaun P. Martin, Esq.  
16 5998 Alcala Park, Warren Hall  
San Diego, CA 92110  
T: (619) 260-2347 | F: (619) 260-7933

17 *Counsel for Plaintiff Younes Younes*  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28