

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
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

**[PROPOSED] NOTICE OF PENDING
CLASS ACTION**

TO: All persons whose property was converted by Defendants using fake online platforms and then routed and deposited at the OKX and Binance deposit addresses identified in this action.

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

This Notice pertains to a class action lawsuit currently pending against Elvira Taylor and others whose identities are unknown (“Defendants”) in the Superior Court of California, County of Los Angeles, Case No. 24STCV12520. You may be a member of the Class for whom relief is being sought. If you wish to be included in this class action, no further action is required. However, if you do not wish to be included in the Class, you must take specific steps as described below or your rights may be affected.

I. DESCRIPTION OF THE LAWSUIT

This case was filed by Plaintiff Younes Younes (“Plaintiff”), an individual who was deceived by Defendants’ misrepresentations and induced to transfer cryptocurrency under false pretenses, against Defendants in the Superior Court of California, County of Los Angeles. Plaintiff claims that Defendants carried out a coordinated cryptocurrency theft scheme involving a fraudulent online platform. Plaintiff alleges that Defendants misappropriated cryptocurrency transferred by victims and laundered the stolen funds through multiple cryptocurrency wallets before consolidating them in deposit wallets at OKX and Binance. Plaintiff seeks, on behalf of himself and the Class, monetary relief and other appropriate remedies to recover the misappropriated funds.

To date, Defendants have not appeared in this action or filed any response to Plaintiff’s claims. Defendants have neither contested the allegations nor opposed any orders entered in this action.

II. CLASS CERTIFICATION

On [Date], the Court granted Plaintiff’s Motion For Class Certification, and ordered that the Class include:

All persons whose property was converted by Defendants using fake online platforms and then routed and deposited at the OKX and Binance deposit addresses set forth in Paragraph 22 of the Complaint in this action.

The Court has not ruled on the merits of the claims raised in this case, and the decision to certify the Class in this case should not be viewed as a prediction that Plaintiff or the Class will, or will not, ultimately prevail on the merits of the action.

III. RIGHT TO BE INCLUDED IN OR OPT OUT OF THE CLASS

If you are a member of the Class described above and would like to be included in this action, you do not

need to take any further action, and you will be included in this lawsuit. Your active participation is not required. Only Class Members have a right to recover any money under any judgment or settlement in this lawsuit and will be bound by any such judgment or settlement.

If you do not want to be included as a Class Member in this case, you may exclude yourself from the Class (“opt out”) by mailing a letter to: Shaun P. Martin, 5998 Alcala Park, Warren Hall 109C, San Diego, CA 92110 RE: Younes v. Taylor. Your letter must be signed and dated, must have your name and address clearly printed, must clearly state that you wish to be excluded from the Class in this case, and must be postmarked no later than **[Date]**.

If you exclude yourself from this lawsuit and do not bring a timely separate lawsuit against Defendants, you may waive your rights to recover any money related to the claims alleged in this action. Any member of the Class who does not timely exercise the right to exclusion will be included in this case and will be bound by any judgment or settlement in this lawsuit.

If you do not exclude yourself from the Class, you may, if you so desire, enter an appearance in this action through your own attorney at your own expense.

IV. CLASS COUNSEL

The Court has approved and appointed the following attorneys as Class Counsel:

Shaun P. Martin

5998 Alcala Park, Warren Hall, San Diego, CA 92110
Tel: (619) 260-2347 | Email: smartin@sandiego.edu

William A. Delgado.

DTO Law; 915 Wilshire Boulevard, Suite 1950, Los Angeles, CA 90017
Tel: (213) 335-6999 | Email: wdelgado@dtolaw.com

Anyone with questions or information regarding this lawsuit may contact Class Counsel.

You have the right to retain your own independent counsel at your own expense and enter an appearance in this lawsuit.

V. ANTICIPATED ATTORNEY’S FEES AND COSTS TO THE CLASS

Class Counsel will represent the Class on a contingent fee basis. In the event of a settlement or judgment, Class Counsel’s attorney’s fees (in a percentage to be determined by the Court) and costs may be deducted from the class-wide recovery, or the Court may require Defendants to pay Class Counsel’s costs plus reasonable attorneys’ fees in addition to any amounts recovered for the Class. No award of fees to Class Counsel will be made without the Court’s approval and further notice to the Class.

VII. VIEWING COURT FILE RECORDS

You may view the Court files in this case by visiting the Los Angeles Superior Court, located at 312 N. Spring Street, Los Angeles, CA 90012. For more information regarding viewing of records, contact the court at (213) 310-7000 and ask to be directed to the Records Department.

Please DO NOT telephone or directly contact the Court clerk with questions concerning this case.

Dated: _____

By: _____
Hon. Elihu Berle