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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.

**FILED**  
Superior Court of California  
County of Los Angeles  
**06/27/2024**

David W. Slayton, Executive Officer / Clerk of Court  
By: M. Fregoso Deputy

Case No.: 24STCV12520

Hon. Elihu Berle

**[PROPOSED] ORDER GRANTING EX  
PARTE APPLICATION FOR  
RECONSIDERATION AND GRANTING  
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

1 This matter came for hearing on an *ex parte* application in Department 6 at 8:30 a.m. on  
2 June 26, 2024.

3 This Court finds as follows:

4 1. Plaintiff has filed a Verified Complaint on behalf of himself and all others  
5 similarly situated alleging that Defendants stole cryptocurrency through a “pig butchering”  
6 scheme in which the victims were persuaded to deposit these cryptocurrency assets in a fake  
7 “work platform” hosted by Defendants.

8 2. Plaintiff and his counsel retained Inca Digital (“Inca”), an experienced digital  
9 investigation team, to track and trace the cryptocurrency funds stolen from Plaintiff and those  
10 similarly situated. As explained more fully in Plaintiff’s *ex parte* application, Inca traced these  
11 funds to the fifteen (15) identified cryptocurrency wallets contained in Appendix A to this Order.

12 3. Plaintiff’s Verified Complaint adequately alleges that Defendants have utilized  
13 false identities in order to steal the cryptocurrency assets at issue herein, and that their true  
14 identities and locations are presently unknown and unknowable to Plaintiff and his counsel.  
15 Plaintiff is informed and believes that many of these individuals are located outside the United  
16 States, as is common in cryptocurrency theft cases.

17 4. Entry of a temporary restraining order without prior notice to Defendants is  
18 appropriate given the nature of the cryptocurrency theft at issue, the alleged use of fictitious  
19 identities by the Defendants, and the fact that the cryptocurrency assets at issue may be instantly  
20 transferred to locations beyond the reach of this Court were Defendants notified in advance of  
21 the potential seizure of this cryptocurrency. *See Jacobo v. Doe*, 2002 U.S. Dist. LEXIS 101504,  
22 \*9 (E.D. Cal. June 7, 2022) (finding that “[i]f defendant were provided notice of this action, ‘it  
23 would be a simple matter for [him] to transfer [the cryptocurrency] to unidentified recipients  
24 outside the traditional banking system, including contacts in foreign countries, and effectively  
25 put it beyond the reach of this Court”).

26 5. Plaintiff proposes a method of service of this order to show cause (“OSC”), the  
27 summons and complaint, and all other papers and Orders of this Court in this matter that is best  
28

1 available manner under the circumstances of this case and reasonably calculated to lead to actual  
2 notice to the Defendants. Traditional methods of service are unavailable given Defendants' use  
3 of fictitious identities and unknown locations. The seizure of Defendants' cryptocurrency wallets  
4 and the delivery of special purpose token or similar device into those wallets pursuant to this  
5 Order will effectively notify Defendants of the pendency of this action and the manner in which  
6 they may object to the temporary restraining order ("TRO") and/or requested preliminary  
7 injunction if they wish. Plaintiff's counsel has advised this Court that similar TROs and notice  
8 procedures have been issued in similar cryptocurrency theft cases in which they have been  
9 involved in courts in New York, Florida, Alabama, and Michigan and that, in these matters,  
10 defendants have on occasion responded to these seizures by contacting plaintiffs' counsel and/or  
11 the Court, thereby demonstrating that notice was in fact effectively received by Defendants, but  
12 that none of these Defendants elected to appear at the scheduled preliminary injunction hearing  
13 due to the illegality of their alleged cryptocurrency theft and corresponding need to state their  
14 true identities were they to appear in court. *See also Blum v. Defendant*, 2023 U.S. Dist. LEXIS  
15 235592, at \*4-5 (N.D. Fla. Dec. 13, 2023 (granting similar *ex parte* TRO and holding that  
16 plaintiff's "cryptocurrency assets are specific, identifiable property that can be traced to  
17 Defendants' Destination Addresses"). Sufficient service will also be effected because the Order  
18 directs that the exchanges in which these cryptocurrency wallets are held (Binance Holdings and  
19 OK Group) provide separate notice of this Order to the customers of each of the cryptocurrency  
20 wallets identified in Appendix A.

21 6. Based upon the contents of the Verified Complaint in this matter and the sworn  
22 declarations submitted in connection with Plaintiff's *ex parte* applications, the public interest  
23 would be served by the requested issuance of a TRO and OSC, and Plaintiff would suffer  
24 irreparable harm absent their issuance. *See Jacobo, supra* at \*15-16 ("[C]ourts have found that  
25 the risk of irreparable harm to be likely in matters concerning fraudulent transfers of  
26 cryptocurrency due to the risk of anonymous and speedy asset dissipation.").

1 Based upon the Verified Complaint in this action, the *ex parte* applications of Plaintiff  
2 and supporting declarations, and upon sufficient cause being shown, this Court grants Plaintiff  
3 Younes Younes' *Ex Parte* Application of for Reconsideration of Minute Order of June 14, 2024  
4 and Orders as follows:

5 **ORDER TO SHOW CAUSE**

6  
7 **IT IS HEREBY ORDERED** that Defendant ELVIRA TAYLOR, Binance Holdings  
8 Ltd., and OK Group, and/or any of their agents, servants, employees, attorneys, affiliates,  
9 partners, successors, assigns, subsidiaries, or any other persons through which they act, or who  
10 act in active concert or participation with any of them (collectively, the "Enjoined Parties"),  
11 appear before this Court on July 18, 2024 at 10:00 a.m. in Department 6, 312 N Spring St, Los  
12 Angeles, CA 90012, to show cause why a preliminary injunction should not be ordered  
13 restraining the Enjoined Parties as set forth in the Temporary Restraining Order.

14  
15 **IT IS FURTHER ORDERED** that:

16 Plaintiff shall serve a copy of this Order to Show Cause for Preliminary Injunction and  
17 Temporary Restraining Order, and all supporting documents filed in connection therewith, as  
18 well as the Verified Complaint, summons, and all other Orders of the Court in this matter, within  
19 five days of the issuance of the Temporary Restraining Order on the Enjoined Parties, including  
20 the owners of each of the wallets identified in Appendix A of this Order through a special  
21 purpose token or similar device delivered into each the wallets identified in Appendix A of this  
22 Order. Each of these service tokens shall contain a hyperlink to a website maintained by  
23 Plaintiff's counsel that will include this Order and all papers upon which it is based, the Verified  
24 Complaint and summons, and a hyperlink that includes a mechanism to track when a person  
25 clicks on the hyperlink. This process shall constitute actual notice of this Order and sufficient  
26 service of process on Defendants and the person or persons controlling the corresponding wallet  
27 addresses identified in Appendix A of this Order.

1 Plaintiff shall file proof of such service with the Court no later than July 11, 2024. Any  
2 papers opposing the OSC or preliminary injunction shall be filed with the Court and served upon  
3 Plaintiff by the Enjoined Parties no later than July 11, 2024. Reply papers by Plaintiff, if any,  
4 shall be filed with the Court and served on the Enjoined Parties no later than July 15, 2024.

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

8  
9 **TEMPORARY RESTRAINING ORDER**

10 **IT IS HEREBY ORDERED** that, pending the hearing on Plaintiff's application for a  
11 preliminary injunction:

12 Defendant ELVIRA TAYLOR, and non-parties Binance Holdings Ltd., and OK Group,  
13 and/or any of their agents, servants, employees, attorneys, affiliates, partners, successors,  
14 assigns, subsidiaries, or any other persons through which they act, or who act in active concert or  
15 participation with any of them, and any individual or entity who receives actual notice of this  
16 Order through personal service or otherwise, whether acting directly or through any trust,  
17 corporation, subsidiary, division or other device, or any of them [(collectively, the "Enjoined  
18 Parties")], are hereby temporarily restrained from withdrawing, transferring, selling,  
19 encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallets  
20 identified in Appendix A of this Order, whether such property is located inside or outside of the  
21 United States of America:

22 Plaintiff's attorneys shall cause a copy of this Temporary Restraining Order, together  
23 with a copy of the papers upon which it is based, as well as the Verified Complaint and the  
24 summons in this action, to be served upon the person or persons controlling the wallets identified  
25 in Appendix A of this Order via a special purpose token or similar device delivered into each of  
26 the wallets identified in Appendix A of this Order, and each of these service tokens will contain a  
27 hyperlink to a website maintained by Plaintiff's counsel that will include both this Order and all  
28

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

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

12  
13 **IT IS FURTHER ORDERED** that:

14 This Temporary Restraining Order shall expire on July 18, 2024 at 11:00 p.m. Pacific  
15 Daylight Time unless extended by the Court.

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

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

21  
22 **IT IS SO ORDERED.**

23  
24 DATED: 1 11 24



25 By: **Elihu M. Berle**  
26 Judge of the Superior Court  
27 Elihu M. Berle / Judge  
28

## APPENDIX A

### OKX

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY
- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

### Binance

- TN6yVddHhmfTHJgdzSnPJJ5M4pxQKqKuVe
- TVBfaX2DF6kBxeveJMEgDjXwpY9zQpES57
- TTTkoMc9VuVKTGFQJPxF5pS2f1XV5u5QHJ
- TAwsDzJgxYhsTkrLkkPiFZsZnkcjmhupfW
- TGyLX41KcZDZpSVH9KjwCbuqNnxDAoTnAB
- TLwgBmjYbkLA5NVFEqrVYVNbnTYmxPKoW2
- TYWjiCsJJ4wAem1unRFybcvQq9ekL8Btv
- TQZoEGjrCSG6BxNDUreTm7Uec6BBx8vSvn
- TBVT9cx9gdaS1AcUfMASJ56Z9SdUy4E3P7
- TYuEjjSM89QJKKKUX3UyY6TxT6QvhzAc37
- TQnKVsgfboAuwepfSwgNxX2pnMgQLVku4h
- TU9kSr7ZwLvBknXmfu6WM5c3hcbG4sRV8m
- TXYG7jR37cLtNVgSzqjPZwJk9zb7XMqk6e