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11 Attorneys for Plaintiff
YOUNES YOUNES
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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

15 YOUNES YOUNES, on behalf of himself and
all others similarly situated,
16

17 Plaintiff,

18 v.

19 ELVIRA TAYLOR and DOES 1 through 200
inclusive,
20

21 Defendants.
22

Case No. 24STCV12520

**PLAINTIFF'S REQUEST FOR
DISMISSAL OF CLASS CLAIMS
WITHOUT PREJUDICE**

*Request for Court Judgment, Declaration of
Younes Younes, Declaration of Nicole G.
Malick, Proposed Form of Judgment, and
Request for Dismissal as to Does 1-200 Filed
Concurrently Herewith*

Assigned for All Purposes to Hon. Elihu Berle

Date: January 29, 2026
Time: 8:30 A.M.
Place: 312 N. Spring Street,
Los Angeles, CA 90012
Dept. 6

Action Filed: May 17, 2024
Trial Date: None

1 Pursuant to California Rules of Court, Rule 3.770, and consistent with the Court’s October
2 13, 2025 Minute Order, Plaintiff Younes Younes hereby submits this request for dismissal of his
3 class claims without prejudice.

4 Plaintiff is the victim of a “pig butchering” scam—the orchestrated theft of cryptocurrency
5 by Defendant Elvira Taylor and her associates. On May 17, 2024, Plaintiff filed this action on
6 behalf of himself and similarly-situated victims of Defendant’s scam, asserting claims for
7 Conversion and Money Had and Received.

8 On May 7, 2025, this Court denied without prejudice Plaintiff’s Motion for Class
9 Certification. At the hearing, the Court discussed with counsel its desire for additional
10 information about the specific identities (i.e., names and addresses) of the members of the putative
11 class, rather than merely an indication of the size of that class, before any class could be certified.
12 Declaration of Nicole G. Malick (“Malick Decl.”), ¶ 10.

13 Consistent with that conversation, counsel endeavored to discover individualized contact
14 information for the putative class members. Unfortunately, that information was not available.
15 The individual cryptocurrency exchanges that possess this information—e.g., Binance,
16 Robinhood, Uphold, ZeroHash, Crypto.com, Gemini, Coinbase, Kraken, Mercury, and Paxos—
17 were not willing to produce such individualized data, on the belief that such information is
18 confidential. *Id.* ¶ 11.

19 Given the complexity of discovering individualized contact information, Plaintiff decided
20 to proceed to seek an entry of default and default judgment on an individual basis. *Id.* ¶ 12.

21 No consideration, direct or indirect, is being given for the dismissal of Plaintiff’s class
22 claims. *Id.* ¶ 13.

23 No putative class members have been notified of the preparation, filing, or pendency of
24 this action. *Id.* ¶ 12. Furthermore, the putative class members will suffer no prejudice by the
25 dismissal of the claims without prejudice. Accordingly, no formal notice of the dismissal of the
26 class claims is necessary. *See* Rule 3.770(c).

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Dated: January 13, 2026

Respectfully submitted,

/s/ William A. Delgado

William A. Delgado

Attorneys for Plaintiff
YOUNES YOUNES