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Electronically FILED by
Superior Court of California,
County of Los Angeles
6/18/2024 8:57 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By K. Valenzuela, Deputy Clerk

5 SHAUN P. MARTIN (SBN 158480)
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10 *Counsel for Plaintiff Younes Younes*

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

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

16 Plaintiff,

17 v.

18 ELVIRA TAYLOR and DOES 1
19 through 200, inclusive,

20 Defendants.

Case No. 24STCV12520

**DECLARATION OF SHAUN MARTIN
IN SUPPORT OF PLAINTIFF'S EX
PARTE APPLICATION FOR
RECONSIDERATION OF MINUTE
ORDER OF JUNE 14, 2024**

Assigned for All Purposes to:
Judge: The Hon. Elihu Berle
Date: June 20, 2024
Time: 8:30 a.m.
Place: 312 N. Spring Street,
Los Angeles, CA 90012,
Dept. 6

1 I, Shaun Martin, declare under penalty of perjury as follows:

2 1. I am over 18 years of age, of sound mind, and am competent to make this
3 Declaration, and am counsel for Plaintiff in this action. The evidence set forth in the
4 foregoing Declaration is based upon my personal knowledge unless expressly stated
5 otherwise, and if called and sworn as a witness, I could and would testify to each of the
6 facts set forth herein.

7 2. Attached as **Exhibit 1** is this Court's minute order of June 14, 2024, which
8 denied Plaintiff's *ex parte* application for a TRO without prejudice to filing a noticed
9 motion seeking such relief.

10 3. In every prior cryptocurrency asset seizure case I am aware of, in both
11 federal and state court, courts have approved TROs that seized the assets without notice.
12 See Order to Show Cause and Temporary Restraining Order, *Pouyafar v. Doe Nos. 1-*
13 *25*, Index. No. 654820/2023 (Sup. Ct. N.Y. Sep. 29, 2023); Order to Show Cause and
14 Granting Motion for Temporary Restraining Order, *Shaya v. Nofs et al.*, Case No. 24-
15 cv-10670 (E.D. Mich. Mar. 18, 2024); Order Granting Plaintiff's Amended *Ex Parte*
16 Emergency Motion for Preliminary Injunction without Notice, *Dollma v. Walter et al.*,
17 Case No. 11-2024-CA-000641-0001 (Collier Cty. Fl. Apr. 1, 2024); and Order for
18 Temporary Restraining Order and to Show Cause, *Mashkevich v. Ava et al.*, No. 50-
19 CV-2024-900163.00 (Marshall Cty. Ala. Jun. 4, 2024). These TROs are attached as
20 **Exhibits 2-5.**

21 Executed this 18th day of June, 2024, in San Diego, California.

22
23 
24 Shaun P. Martin

EXHIBIT 1

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Spring Street Courthouse, Department 6

24STCV12520

YOUNES YOUNES, vs ELVIRA TAYLOR,

June 14, 2024

11:23 AM

Judge: Honorable Elihu M. Berle

Judicial Assistant: M. Fregoso

Courtroom Assistant: M. Molinar

CSR: None

ERM: None

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Ex-Parte Proceedings

The Court has reviewed and considered Plaintiffs Ex Parte Application for Temporary Restraining Order and OSC Re: Preliminary Injunction, filed on June 11, 2024.

Plaintiffs Ex Parte Application for Temporary Restraining Order and OSC Re: Preliminary Injunction, is DENIED WITHOUT PREJUDICE, to filing a noticed motion.

The Judicial Assistant gave telephonic notice to Marisol Ramirez, legal assistant to plaintiff's counsel.

The Judicial Assistant gives further and formal notice as indicated in the Certificate of Mailing.

Certificate of Mailing is attached.

EXHIBIT 2

At IAS Part ____ of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse, 60 Centre Street, New York, New York 10007 on this 29th day of September 2023

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RACHEL POUYAFAR,)
)
Plaintiff,)
)
-against-)
)
JOHN DOE NOS. 1-25,)
)
Defendants.)
_____)

Index No. _____

**ORDER TO SHOW
CAUSE AND
TEMPORARY RESTRAINING
ORDER**

Upon reading the filing by Plaintiff Rachel Pouyafar (“Plaintiff”) of the Summons and Complaint, the Affidavit of Plaintiff, dated September 28, 2023, the Affirmation of Charles Zach, dated September 29, 2023, the Affirmation of Rishi Bhandari, dated September 29, 2023, and the memorandum of law in support of this request for emergency relief by order to show cause for a preliminary injunction and a temporary restraining order pending the hearing on the preliminary injunction, pursuant to Civil Practice Law and Rules (“CPLR”) 6301, 6312 and 6313 and hearing wherein plaintiff asserts that it will suffer immediate and irreparable injury in the event that Defendants John Doe Nos. 1-25 (collectively, “Defendants”) are able to sell, transfer, convey or otherwise dissipate cryptocurrency allegedly stolen from Plaintiff by Defendants; it is

the Ex Parte Office
ORDERED that Defendants shall show cause before this Court, in Room 315, 60 Centre Street, New York, New York 10007, on October 12, 2023, at 10:00 a.m./~~p.m.~~^V for further reassignment to an IAS Part, or as soon thereafter as counsel may be heard, why an order should not be issued: (i) preliminarily enjoining

during the pendency of this action the Defendants from disposing of, processing, routing, facilitating, selling, transferring, encumbering, removing, paying over, conveying or otherwise interfering with Defendants' property, debts, accounts, receivables, rights of payment, or tangible or intangible assets of any kind, whether such property is located inside or outside of the United States, including, but not limited to, the cryptocurrency held at the “hot wallet” address of: 0x01d19c7dab1da4d2c9a7a8c54a9c1e9b7b5a7b9a (the “Binance Hot Wallet”), and it is further

ORDERED that, in the exercise of the Court’s discretion pursuant to CPLR § 6313(c), Plaintiff is not required to give an undertaking pending the hearing on this order to show cause; and it is further

ORDERED that Mandel Bhandari LLP, Plaintiff’s attorneys, shall cause to be served a copy of this Order to Show Cause, together with a copy of the papers upon which it is based, on or before October 2, 2023, upon the person or persons controlling the Binance Hot Wallet via a special-purpose Ethereum-based token (the “Service Token”), delivered or airdropped into the Binance Hot Wallet. The Service Token will contain a hyperlink (the “Service Hyperlink”) to a website Mandel Bhandari LLP will cause to be created, wherein Mandel Bhandari LLP shall cause to be published this Order to Show Cause and all papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute good and sufficient service for purposes of jurisdiction under NY law on the person or persons controlling the Binance Hot Wallet; and it is further

ORDERED that pending argument on the motion for a preliminary injunction, a Temporary Restraining Order, pursuant to CPLR 6313, shall be entered freezing the Binance Hot Wallet address of: 0x01d19c7dab1da4d2c9a7a8c54a9c1e9b7b5a7b9a.

ORDERED, that opposing papers, if any, to this motion shall be served via mail to Mandel Bhandari LLP, 80 Pine Street, 33rd Floor, New York, NY 10005, and via email to rb@mandelbhandari.com, so as to be received on or before October 6, 2023, and reply papers, if any shall be filed and served in the manner set forth above so as to be received on or before October 11, 2023.

ORDERED, that the summons and complaint in this action were filed and the index number is awaiting assignment. Upon assignment of the index number, moving counsel shall electronically file the instant Order to Show Cause, and all supporting documents within 5 business days.

Dated: New York, New York
September 29, 2023

ORDERED

A handwritten signature in black ink, appearing to read 'Adam Silvera', written over a horizontal line.

Hon. Adam Silvera, as Ex Parte Judge Only
J.S.C.

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

STEPHEN B. SHAYA, on behalf of
Himself and all others similarly situated,

Plaintiff,

Case No. 24-cv-10670

Hon. Mark A. Goldsmith

v.

KYLIE NOFS, ZHU SHICAI, LUO
YANBING, LIN YIN, YANG ZHENLIN,
and JOHN DOE NOS. 1-25,

Defendants.

ORDER
TO SHOW CAUSE AND GRANTING MOTION FOR TEMPORARY
RESTRAINING ORDER (Dkt. 3)

This matter is before the Court on Plaintiff's Emergency Motion for Temporary Restraining Order and for Order to Show Cause Why a Preliminary Injunction Should Not Issue (Dkt. 3). The Court has reviewed the Motion and Brief in Support of the same, as well as the Declaration of Stephen Shaya, the Declaration of Charles Zach, and the Declaration of Kenneth F. Neuman. The Court is satisfied that pursuant to Federal Rule of Civil Procedure 65(b)(1), the issuance of this Order to Show Cause and Temporary Restraining Order is warranted without written or oral notice to the Defendants based on Plaintiff's setting forth specific facts of the

likelihood of immediate and irreparable injury if time were afforded to allow Defendants to be heard in opposition to Plaintiff's Motion before ruling, and because notice prior to the issuance of this Order should not be required for the reasons set forth in Plaintiff's Motion and Brief in Support. Based on the foregoing, and for the reasons explained below, the Court GRANTS Plaintiff's Motion for a Temporary Restraining Order (Dkt. 3) in its entirety this 18th day of March, 2024, at 5:00PM.

It is hereby **ORDERED THAT:**

1. Plaintiff's motion for a temporary restraining order is GRANTED.
2. Defendants KYLIE NOFS, ZHU SHICAI, LUO YANBING, LIN YIN, YANG ZHENLIN, JOHN DOES NOS. 1-25, Binance Holdings Ltd., WhiteBIT, MaskEX, BTSE, B2C2, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, (collectively, the "Enjoined Parties") are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallet addressed listed in Appendix A of this Order, whether such property is located inside or outside of the United States of America.

3. Plaintiff's attorneys shall cause a copy of this Order, together with a copy of the papers upon which it is based, to be served on or before March 22, 2024, upon the person or persons controlling the wallets identified in Appendix A to this Order via a special-purpose Ethereum-based token (the "Service Token"), delivered or airdropped into the wallets identified in Appendix A to this Order. The Service Token will contain a hyperlink (the "Service Hyperlink") to a website Plaintiff's counsel will cause to be created, wherein Plaintiff's counsel shall cause to be published this Order and all papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute actual notice of this Order and sufficient service on the person or persons controlling the corresponding wallet addresses identified in Appendix A of this Order.

4. Binance Holdings Ltd., WhiteBIT, MaskEX, BTSE, B2C2, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with the wallet addresses

identified in Appendix A of this Order, including Defendants, and provide counsel for Plaintiff copy of such notice.

5. Pursuant to FED. R. CIV. P. 65(b), the Defendants, Enjoined Parties and anyone else wishing to be heard, shall appear on April 1, 2024 at 9 AM for a hearing at the United States District Court, Theodore Levin U.S. Courthouse, 231 W. Lafayette Boulevard, Detroit, Michigan, where they may show good cause for why this Court should not enter a preliminary injunction further enjoining the withdraw, transfer, sale, encumbrance, or alteration of the cryptocurrency or assets held in the wallet addressed listed in Appendix A of this Order during the pendency of this action, whether such property is located inside or outside of the United States of America, and imposing such additional relief as the Court deems just and proper.

6. The Defendants, the Enjoined Parties, and anyone else wishing to be heard, shall file with the Court and serve on Plaintiff's counsel any response, opposition, affidavits or declarations no later than seven (7) days prior to the hearing for preliminary injunction. If such documents are filed and served, Plaintiff may file a reply brief in support of its request for preliminary injunctive relief no later than two (2) days prior to the preliminary injunction hearing.

7. Defendants and the Enjoined Parties are hereby on notice that failure to timely serve and file an opposition, or failure to appear at the hearing, may result in

the imposition of a preliminary injunction against them pursuant to Rule 65 of the Federal Rules of Civil Procedure.

8. The temporary restraining order set forth in this Order will expire fourteen (14) days from its entry unless, for good cause shown, this Order is extended or Defendants consent that it should be extended for a longer period. However, the Court may, upon demonstration of good cause by any party-in-interest, shorten or lift this Order.

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

10. Notice was not provided to Defendants prior to issuance of this Order either because their identities have not yet been ascertained or because the Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Appendix A of this Order.

11. Pursuant to FED. R. CIV. P. 65(c), the Court in its discretion determines that no bond is required.

12. This Order was Issued March 18, 2024 at 5:00PM.

Dated: March 18, 2024
Detroit, Michigan

s/Mark A. Goldsmith
MARK A. GOLDSMITH
United States District Judge

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or First Class U.S. mail addresses disclosed on the Notice of Electronic Filing on March 18, 2024.

s/Jennifer McCoy
Case Manager

APPENDIX A

Cryptocurrency Addresses (categorized by exchange)

Binance

- 1MiobFphxPJ4WiKahfBo2MaZQEvfpnzHp
- 0x3e771B4Aae63A8Ff4D6e748b217a478C9e3fD0Fc
- 0xbDB99397306D5Ed439A866a1196C2878fFD30af0
- 0x00adC74eca60bc8570fBfbf2Ae0001bdBA9987d1
- 0xa3e7232f754c25dB48E7B1e45935830c987E81B0
- 0xBddd281A443980a4711442a43c846604F0174e9B
- 0x1b014AbF59be85aa1A9abc16766873239637F4d6
- 0x9D6D61B5b466F870E809659B6c0EFE0cc9B06BA4
- 0xcd269B39EA2855242258F90089cc76e6f10504Ab
- 0x4f9C4ac9107A3Aec6b09Db004810Db0A6c65eD44
- 1MJeD1xARua9y9EzusBXeZwmcZftgZ48kn
- 15coUULzLprp1fQvirgRPxJKF4LaTiVMPW
- 15szMaFnEgsfYAKuVKjafPyeV7kdkKx1LV
- 15UmREUGRssw42ptnC4ie7xK1u5nhXrfi7
- 15yoLFniWtKSt8YTdBCR3YdmnX2DNk3SHM
- 16cX4spbtNpGhqzTpBhedop7EBHPS3tgrk
- 16paf23pp94feCF2YVceDDhTk36FHACihT
- 16vzwevyUmE52U4bsPAHM6cCK9sK31Rjo3
- 1725hUxmFvtaLbdC1SEyHD6ocGTC55eexx
- 1DnVrd1hDjXQz83p3Mh4tf3cFqjsGfvmMv
- 1Ec83cfjkwjSQyafJ9oFXTpgpKmgwjvo2d
- 1EesTgoexyPsPMsRTXtc2R2NVPcYYHbGP8
- 1EJQnosfynok4LZRqcMqTCfDdZMS2Xz9Pb
- 1EWgCTg17DaCHGGQf5ZZ3BV52CFKkF4vE9
- 1EYQ9uvqeGmRg41Yea42yigWoAKqftB9ik
- 1F73oPbsSb2sShxQQbbXY6F1vEQWMfYAwY
- 1FfjgorWHSPc4jgK2HKKHXMNCQHGMwMYZ
- 1MNMBRsVK2oLzQ2TsTwQHm4uHwz6JyxQLx
- 1MUQ7KWARGTTtysgxjxgiL1vk7r3RgYDjY
- 1MVSf7yLxBNJTHqRJxkMj3UscSpVsBW8fJ

- 1N1DEHgk5nVV2smaeu2RPPKJ671EE7CE7d
- 12397TpnaobznX1Tgmbf7LyWtttUj2ts1g
- 125VuPdt4yxZquEqaDPf4Rb6A7btNmMaCp
- 128wXsuiKxQ9DzQ5xmCXztPvUbdogPUW95
- 18ywsJ3ivFG1QxvRjgyAZ18yzAxLSTbhwb
- 1936HAeaa6mE95dqPKkrbMTzBkAZxepJkE
- 19PZrNm7CucpCZdT39bf9p5ac1Cg1Mh5CS
- 19VVjDPkPnbYUBAep7VCL6MoEKzKPYF4pp
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- 1NA9BGRQt7rwYHgfZg4tErBzSeBTgJUALS
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- 1MSWpiNSHs4rTEBoKXZBEc9LvWmDRKZphA
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- 14nx4kPz3jrru15NwA6bxyjoCfN39B6Hxd
- 19KjbadinBFiFqqfRWJqpGU9cMG2pbYkbz
- 19UZo6BKzWXMj1mufPaCYqMRpBFvEnSGcM
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- 1G5iM759XrbpGdSugAE64T3NgQ1LFKTqat
- 1GTVTLWNfYGrS5TMMg6jg9bTVV3JsyEjbS

- 1H3VMz3TSTjAWAriL1ne2fnhbmSYvZrdM7
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- 1DEiAn9Xhx9fr9hmY5DGpwK8FGx5tqRZe4
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- 15UH6YS1MfXmZ8y5jY4iMAEF1wbPbgZQWp
- 166yJrfoqFcs5HzD631Mx7vTJMxYJ8kqZg
- 17vYgtbzkSm3NY4EakEoCWsqu9gVXDCi5s
- 1B1KhZMsmVhkl46Vxa9k1QeV8rRQQR58eG
- 1BPiftyW56wnjzv97c5QMAFwEryNGqLHjm
- 1BUVZSUhCVWf2mPRoPw7P2f5xrWbFErEak
- 1JwMx3PUT4j2vuNFBbyTLC41pEE5JeWiKg
- 14hFMNwknSJfi358kejXTGHyZiWu4Ke1Tq
- 14KRgxcivg391N68nqNK9iW4y7iqkpw8X
- 15aKQnkKzfokJy9fnvUxkwyZdXbALisWWv
- 164ABGGG7SpGjbyHuvAZD395DW71W1d9re
- 16WAA7Rno1AynKNo3vKPMW8CHhbsPAHsR
- 1718GhR1vpxHrzoBWTgvcb1zPzMn4Z7D3R
- 1CzzTTVmxJG1UioHL6EnmqeQN6oLiALKi3
- 1DbD8WvUTDZxWCR1PkKvW2sfj92kh2vU7R
- 1Fjr6FMR8hfDn1fLqd8f3vFayFBdVtcgxx
- 1FnyMqtXKUPFLb8ydibvLvq6TYUomawHgd
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- 12KwfqAr4wCTfPwUCNLbPHtLJ69JesJohE
- 12qGNXVXSvsjZtieDupYqvq2thazyJFr5F
- 12wa8tT8mCqebmkkJvmEfeFr1jd46EDtue

- 12zkVgriHrpTdqm7MMR9Fe6qoUSxS7xW6z
- 137fsnp643eUf2XWv4vC82WE2ELDaUPuB7
- 13gAkrPnPMZMDtyTLvZkpkcr9UoJT6WRum
- 13k77pp1z9QhiP7j7bYKwN3fTT6vAPrpCD
- 13RfJ63gLLxAj2YDcknUhu6ucDYTAhdzi1
- 13xWEjxgDjX9k82uJyvZHUFRC7b4opkaQa
- 17Q4Rayqv65sRSkhLRAHMiWxiDK6YzrTS3
- 18asd18XCewna9zBF12GMXVc2Lc4PrzWc
- 19ERtztgKiNMw9noS8qUYaP8AVBJ9fntYM4
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- 1D9CeuK4mQqfYmZQgMGqnck1br38JMCKcT
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- 1DL17qD7JrsgjnZa5FoFSuh7mqMJwwsPHs
- 1DTXKuJFAXWi9Z73fCKprR8FAfpkC6dwqz
- 1E1dFDRw6Kq56EwLvGPQdTe7MQqN1WWE8f
- 1E3wVz4eCBFWU2CHycVZznDGLrSkgcHfwz
- 1E9oWH8pJ8YmtNJvEV1hxBdEk2DFKJ5hfc
- 1EcpeKZquA6Cnt89aAxKqn9bYUMq3RrNoq
- 1EeF81e5Bzo3K6eiKGhXZsHtpMWTnyqhsV
- 1BxoxcVYWcYcHwVTSLE6Z6FQ6puJNECZu
- 1FLLCsStZFL6eXqUx5PTXfi6tzAqWS6J8o
- 1FKtoEsRhNAaGMZAehsqS5x4SxebNUGEVN
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- 1FYzy9HoqPhHi9VtF9XGNXh9LYU6i9RpH5
- 1GbmVc1dErt7WCruXAQ5uk9E4bKVHYdBQQ
- 1JiDvvnZTfqpw9zJEugPFu39SoqqubGBqj
- 1KbMXBddvgsVo7nuiyfnkUk3zrq6FdWKEd
- 1KcUjPbCEX8L5Mf2LwnBLA3Pg7gZMXBh3V
- 1KgNNfbdsGReoB7d1UJNULQ3jVcNnA1cYc
- 1Kkd5nbh2g5tff5gsgEYQRVUfuNjxmvcVK
- 1KMUeSMo9ep4FeSZzqJp2PsUSvEAgPLTjv
- 1KNwR5yrxF2qJHDatsDKdxsYKyLvewoMp3
- 14X6V5WfG5pEgpeb5e8H3bmdBs5vZpm
- 159uD1UYN45HKMp2nt4KTKTKVjQbMoVUbS
- 15hKD15DbCGiHmodgvsYFbLsjRTrdWzZez

- 15kBWZiYC1CD61obR7wyp6od8rWSR6P7nV
- 15n7EfMfwTJu2ANLSbdvtsGTiqGGTz8E2
- 15P7s3YJAhMjGh3u1aZdqk5QNU93wbKWM7
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- 1GMZ5TmNhFbwmXowdJwRH27seuWfa86QJc
- 1GMNLYaHvTrBzWjS5X87bKLBM11ovSvbo9
- 1HcB9Ld2dfpuQfGqpCTxaCRLfeKp31MTo8
- 158ZDCPXopsAo6Ybhawduuq1XPDKR75SqY
- 1DgsexDXnhriRbSZXVHxy1WRDFmBQbDmu2
- 1LBRgXyUKnY5wsj9LMXADTSu87cBD5J2Wk
- 1Ciiza4dVvBEwbdkEQB2MsBxBKBEmsohRo
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- 1Dot7dXt8ynUa16J4Ep5wfae9Pr241TtVk
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- 1DuQv2pWkXvpJjUTi492BweiwKYdsjgJji
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- 1DW9FNy1RsR2SDgMHAf7yccnYqJVT3iwJX
- 1DZKPqk6awD1ZWmw1aZUXiB1SNpnK46fmU
- 1EehA1pVFkQk3gBTUh5h1a956iGt4NhXnT
- 1ELcug4RecqUsw6DH7tH7pqVbvRDarGwtM
- 1KLvo7yx4LN5gR7oW8eY1EytT5ZWMTQpXR
- 1KwLSR6atAfYsAYBFbBtKeKSN7ZJ6uvQLn
- 12FFq4VURcZjQfvMP2va2t1grjpoQU54kw
- 1MWAEr6FgaacmY4aPqyQkVJZs1WRQxCdgG
- 1MXdDyrt8oTFAi7odqQ9m7tyykhNzZjYAQ
- 1N2szUzBsgWij2ueReFnJVAzwf9ddFxagA
- 1N6k3bryq35e8sAJdxtpaq5AZ67dsXWHQ9
- 1N6oHECud3uYhXwk3gJE5sqlsAq7Cf5m2P
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- 1KTHBVQyvsu1uaJQFnmTVEUTwfb4GZjLfr
- 1KWZDHBZFUdOk5PkDGFyPR31nPeEvHmwdw
- 16NXY7qC2Xnz9kJLjdfUKD8G3RybzRtJYU
- 175RZAg8buvQPjqJo9QhN3KmQQGYAprCkW

- 1H2XQSgYBvpUfPsCuwrR2Fykh6WxLoQkDM
- 1HdmbYAQDnN7pK49cgoqrrsNLWwDZmJoYJ
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- 1HrV7njhev1UQTTRTXzqLxDG5MKYbwMYf8
- 1MrTUKT5JdGjmA2gg77X2y6F5KQXhysy6y
- 1MseQjHk8efgKtrHgXPfphLBCkeri7J1aZ
- 14iNmRSpXeBgCdMMxeU1yfScDtk3ci63ip
- 14ogaEECDuuXN2rfNdsUsn1oEd6zHMfjrj
- 19N2tN5mo4hRAs9RAsUDLwsfk7pBxSQJsX
- 19rkHRcQzcMJ7V61Tct8B8uH7FeC9BuaC1
- 1AM52X6yKqgQWGppB6RwMq8o14F3bioUYq
- 1Ask5fc3RPKKtxd8uLofzDwsdVqfBpAq3y
- 1FTkTxCJa9coo46bS6hH5TbjQJ37bY7146
- 1G4pCRUiQsxSv5Xd7P3TbGqCH4JbazDfC9
- 1GVJEJHdpSVWxiR26mCtWafUpEsoJPTYQ9
- 1H4cav6ZGbq2xvJHPB4QdwEG6CvkAekoDc
- 14QAHPAX67KrxLqRJDfvVopCbs55nGdXse
- 14VPsVjVqouBTMQenTfuiT9V9ckMGZRfi1
- 15nEeJfBhrq2WSR2kjBCdVGV3sYPYZ2MmX
- 15vpAKUjjRQ9XVijf2AnMhHDCDtH1AxhP4
- 1AgUTiJpnNEM8VHqjrgAJZ3f85SSU24zU6
- 1ACPACfzbWFrN4fMrZjceoyVxH6xEn2udi
- 1BaeLbXaBJFGSgzBc6xvbCvXkP8aio6epS
- 1BL5QE1zKr22Tq9qEnkgU3tMhR9zCwEB9G
- 1Gdv8LwDfLAXG8xVoTG1i4dfgd1wJnFzNy
- 1GG8KacmHAZuqNDPtA7cxr74g7CpR7Gtjw
- 1H5i1iKfpYhK5x51m4jHhV8nJL3a38t9kk
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- 1LcQ1tutGsbLvBMfgpLuAEa3chPpC5axoH
- 1LFRvHnx48vS5jyM5cBD6HCDtgQRbTvxbj
- 1LTQDFfNJwLcCyahMpFWS3pv1fQmKcbEUo
- 1LyuBQ8s8Zz59vbdCSqDHHkjCjKBePbxBv
- 1NywPrkvfRV7wwDcEXCfNcmmLuNGWFt8tG
- 1NZdKKbPBdokgXVfNB5wAXCXrfo2VNbnsR
- 1PFz8rkprQpnRFs9vboR3cvrZnsLDSYwpx

- 1PgeJviuXMChGPsbB1GzqUo3BYA1R2wHcp
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- 1DaJCDCWMpxMuNADciKHnrmUE8fZkAwE43
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- 16puhJn5DyFU31ZoykhG4JyVADue7WPzyH
- 17vbwJdLMBTiieyqoo7iENkZmoCwHpvQvd
- 1AzzxvmtCaTewtty1VejmMsJabdj4ruLXM
- 1BrnjhdJNHuZAwKvR5ouL4JgT2qKAfvwSf
- 1FvRHcz5udj8hMiNcq4TPus8MPn3v7s3Yv
- 1JWirwX2uvD5w2VxVk2uP5Nsrz7EPSVpHm
- 1JZ5nd4i6AMR4oNDxJrNiwptwRSXXrmCde
- 14frtNUnULbiqZqtpnapUBVkgjATVqtgeg
- 14Hnf5HwW8RTpxkfaLyH3XqpCYKhDXLP9c
- 157diGyebe2NiQB577xcfT9tvj26WcuLCY
- 15EFyTcNxyFquTtngh3Hd558yZs9HtiwyT
- 16WmYHZfhB3zwSpqfpSX1TaDqYUfa6zbcu
- 174GdhvgviWBV8fnw69smJrkbYDkmDsXoy
- 1D14zBoQ6N9RUTecA6UsKfpQNe8xXnAE8c
- 1FL2inyBSyQxZv2nhKBsg3pbXEXn4JqDq9
- 1FrDNEu54dwhyBtwoahxJLcvigT5CbbYzm
- 1FVPV1LYkZt3zuRUTtc7GHB3zRMnLSVyUS
- 1HPZd5ARUsmZXLqzooSAbiT69oka4HVxxh

Whitebit

- 0x12c8aB32bfC3b5da73d987073EB854d212909c85
- 0x50bAa1501fa610d79269c50fBcd52eFE46C80d80

MaskEx

- 15BG9ze2GaB6ZZrHxcsXEWJew9K4bNPE5X
- 16fogJ7eQnSkaB7HXshjgWKG5g2XDYuZWk

BTSE

- 0xDDAad971BE05321FD541372CD710a7f0555972eD (Omnibus Account)

The above BTSE account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds.

B2C2

- 0x66E092fD00c4E4eb5BD20F5392C1902d738aE7bC (Omnibus Account)

The above B2C2 account is an “omnibus account,” meaning that, on information and belief, it contains funds in addition to Defendants’ funds. On information and belief, the following transactions hashtags (“TX Hash”) involved Defendants’ funds.

- 0x2d316ca9d2b52989107a020f14af82408f17c1e5c83cbd9450f5893be8b42c3a (TX Hash)
- 0xc11f4ad41b733373d0d673f6be4c4654b6beaa7529770c4b8d04ec7f62ebb948 (TX Hash)
- 0x5ff986baa5bdb8405dc04d2ccee1ca1ed52bf5ff277115ce79b6d44932555712 (TX Hash)
- 0x2ac884b86d774e2be6fa501452d413124bec1e45b6c872b11ba0fd397c3c1815 (TX Hash)
- 0xbe9b2f25b1b2da44f2c139a62e0aa97d87601187ca1a582ea74f1f0d5f84ee5d (TX Hash)
- 0x990da9517570415f126672ea5c85127ef9ecd6c3ed8f47f569dceaa5004ffbe9 (TX Hash)
- 0xe6a52077edb1dccfa984cdb66bdf3ead032cc7ceed998fbef0c95f99d6ffc03 (TX Hash)
- 0x6f4903a36c9f71f2cbcc30dc9ec9f53dea241507fb2e7e5c9191df0d67feec5a (TX Hash)
- 0x3306915a99fcc9cdc09f2ee067564af35f13474cff2f5a090295fc6bb08b2543 (TX Hash)

- 0x25f14dfd96ca516c02ef69e5594670e27c1df0425fbfe36acd77250870ce651c (TX Hash)
- 0xfa804d4bac7d30c55eafc5fd4a4c4fd344c38079b4682647550d087365140e24 (TX Hash)
- 0xa1ed9a9db5bd3394cd1417d0286f35e65a732c0e43240a8425a2734f9b376cf0 (TX Hash)
- 0xb2d775989fe37bf33c35becfa54d6fc9cebd330eccd376db3af7c25f31744ded (TX Hash)
- 0xb332d28abca541199f60dc330419d42f0bbf60458e7a2b82d74a716dc45dcf45 (TX Hash)
- 0x020b7e77931290d162d00cfe8e80c29ca9492c4d3ae41f61872fa10810f3c0e6 (TX Hash)
- 0x4cfe9b82fc5886718804bf525f429476357156e3540cc9e2c3ad92823a069d69 (TX Hash)
- 0xa91d23889f9d5b86f2b955a83de12516052a0aff004971963de3305bd8d03741 (TX Hash)
- 0xa775eb324e6fdef4b5414523b9a36609a98b75f285d6b7d119b8e18b825ae7d4 (TX Hash)

EXHIBIT 4

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
COLLIER COUNTY, FLORIDA

Case No.: 11-2024-CA-000641-0001-XX

KLODJAN DOLLMA,

Plaintiff,

v.

LENAWALTER,
CRYPTOHEROM, and
JOHN DOE NOS. 1-25

Defendant.

**ORDER GRANTING PLAINTIFF'S AMENDED EXPARTE EMERGENCY MOTION
FOR PRELIMINARY INJUNCTION WITHOUT NOTICE**

This matter comes before the Court on Plaintiff's Amended Ex Parte Motion for a Preliminary Injunction Without Notice (the "Motion"). The Court has carefully reviewed the Motions and the record and is otherwise fully advised of the matter.

Plaintiff moves pursuant to Florida Rule of Civil Procedure 1.610 and Florida Statute § 812.035(6) for entry of a temporary injunction without notice to Defendants prohibiting the sale, exchange, transfer, dissipation, pledge or other disposition or encumbrance of the crypto wallets attached to the Motion and attached hereto as Appendix A.

For the reasons set forth herein, Plaintiff's Motions are **GRANTED**.

FACTUAL BACKGROUND

The Complaint alleges that Defendants engaged in a scheme to lure victims to transfer funds to crypto wallets controlled by Defendants. Plaintiff alleges that Defendants created a fake

cryptocurrency trading platform called CryptoHerom to transfer funds to crypto wallets controlled by Defendants.

Defendant Walter contacted Plaintiff via Facebook around August 28, 2023. The interactions progressed to daily conversations and phone calls. Walter gradually introduced the idea of profitable cryptocurrency investment through a platform called CryptoHerom, which the Defendants controlled. On August 31, 2023, Plaintiff transferred \$1,050 from his Coinbase wallet 0x7c195D981AbFdC3DDecd2ca0Fed0958430488e34 to a Crypto.com DeFi application that then connected directly to cryptoherom.com wallet 0xdAC17F958D2ee523a2206206994597C13D831ec7. Walter explained that Plaintiff could withdraw funds at any time and Walter could help acquiring loans for Plaintiff in order to invest more money. Walter promised additional funds for referring new investors, enticing Plaintiff to invite friends and family members to also invest money in CryptoHerom. Plaintiff transferred \$410,000 from his accounts through the CryptoHerom platform and unwittingly convinced his friends and family to participate in the scam by encouraging his cousin, his uncle and his friend to invest. Plaintiff's cousin Indrit Vogli invested \$102,103; his uncle Shkelzen Vogli invested \$136,730; and his friend, Rei Culi invested \$1,000 accordingly. (See Affidavit of Plaintiff attached hereto as Exhibit 1)

CryptoHerom's customer service advised Plaintiff of issues with his account. Additionally, October 30, 2023, Walter told Plaintiff that his wallet account was "at risk" and persuaded the Plaintiff to "avoid any problems" by providing Walter access to Plaintiff's wallet by sharing his secret key. Thereafter on November 11, 2023 Walter ceased contact with Plaintiff and Plaintiff was blocked from accessing his CryptoHerom account and associated wallets.

Plaintiff contacted Inca Digital ("Inca"), a cryptocurrency investigation firm which

traced Plaintiff's transactions and confirmed that CryptoHerom was orchestrating a scheme to convert funds via the application. The Plaintiff's converted funds can be traced to the accounts identified in Appendix A of the Complaint and Exhibit 2 of the Motion for Preliminary Injunction.

There is a high likelihood that Defendants, upon receiving notice of this action, will take measures to withdraw all funds from the accounts. If Defendants withdraw the funds prior to the account being frozen, this will eliminate the possibility of recovery for the Plaintiff.

Defendants will likely withdraw the funds if they become aware that Plaintiff is seeking its relief, as they have already undertaken transactions to hide and steal Plaintiff's cryptocurrency assets.

LEGAL STANDARD

To obtain a temporary injunction, a party must demonstrate that (1) he is substantially likely to succeed on the merits of his claims; (2) he will suffer irreparable injury if the injunction is not granted; (3) an adequate remedy at law is unavailable; and (4) entry of the injunction will serve the public interest. *See Florida Dep't of Health v. Florigrown, LLC*, 317 So. 3d 1101, 1110 (Fla. 2021). Where injunctive relief is sought pursuant to Fla. Stat. § 812.035(6), the same standard applies, except that no showing of special or irreparable damage is required. Instead, the plaintiff must make a showing of immediate danger of significant loss or damage and post a proper bond against damages for an injunction improvidently granted. *See* Fla. Stat. § 812.035(6).

A temporary injunction may be granted without notice to the adverse party if "(A) it appears from the specific facts shown by affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and (B) the movant's attorney certifies in writing any efforts that have been made to give notice and the reasons why notice should not be required." Fla. R. Civ. P. 1.610(a). Although this section is written in the conjunctive, "it makes no common sense to require certification of efforts to give notice to a party when there are good reasons not to give notice. Verified allegations as to why notice should

not be given in a particular case are sufficient.” *Bansal v. Bansal*, 748 So. 2d 335, 337 (Fla. 5th DCA 1999) (citing *Smith v. Knight*, 679 So. 2d 359 (Fla. 4th DCA. 1996)). To establish that a temporary injunction may issue without notice, the movant must “demonstrate (1) how and why the giving of notice would accelerate or precipitate the injury or (2) that the time required to notice a hearing would actually permit the threatened irreparable injury to occur.” *Smith v. Knight*, 679 So. 2d 359, 361 (Fla. 4th DCA 1996).

CONCLUSIONS OF LAW

The Affidavits Plaintiff has submitted in support of the Motions support the following conclusions of law:

1. Plaintiff has shown a substantial likelihood of success on the merits of his claims against Defendants for conversion and injunctive relief. The Plaintiff was victimized by the theft of his cryptocurrency, and it appears from the record that Defendants have no right to claim either possession or ownership of the Plaintiff’s stolen assets.
2. Because of the speed and potential anonymity of cryptocurrency transactions, Plaintiff is likely to suffer an immediate and irreparable injury if a temporary injunction is not issued. Moreover, considering the actions already taken to steal the Plaintiff’s cryptocurrency, conceal the theft, and dissipate the stolen cryptocurrency, Plaintiff has good reason to believe that the Defendants will take further action to hide or dissipate their ill-gotten gains unless those assets are restrained.
3. For the same reasons, Plaintiff has also met the lesser requirement to show “immediate danger of significant loss or damage” under Fla. Stat. § 812.035(6).
4. Giving notice of Plaintiff’s motion to the Defendants is likely to exacerbate the threat of irreparable injury by accelerating the dissipation of the stolen cryptocurrency. Considering the speed with which these transactions occur, and the pattern of deception thus far, in the time required to notice a hearing, the Defendants could easily liquidate or transfer any stolen cryptocurrency (or the proceeds thereof) that remain in any accounts that they control. *See* Order Granting *Ex Parte* Emergency Motion for

Entry of Temporary Restraining Order at 7, *Heissenberg v. Doe*, No. 21-Civ-80716 (S.D. Fla. Apr. 23, 2021). Plaintiff has therefore demonstrated sufficient grounds to excuse notice in this case.

5. Plaintiff has as an inadequate remedy at law. His only remedy to recover his stolen property is through equitable relief, beginning with the imposition of injunctive relief. A legal remedy for monetary damages alone will not protect his ownership interest in these valuable assets. *See Martinangeli v. Akerman, LLP*, No. 1:18-cv-23607-UU, 2018 WL 6308705, *2 (S.D. Fla. Sept. 14, 2018).
6. To the extent the public interest is implicated by Plaintiff's Motion for a Temporary Injunction, that interest would be served by entry of the requested temporary injunction. In cases like this, the public interest "is properly served by promoting the objectives of the Financial Crimes Enforcement Network ("FinCEN") ... and providing assurance that courts will protect investors' assets from theft and will aid investors in their recovery of stolen assets when they can be readily located and traced to specific actions." *Martinangeli v. Akerman, LLP*, 2018 WL 6308705, *2 (S.D. Fla. Sept. 14, 2018).
7. The Court has the authority to issue the requested temporary injunction both pursuant to Fla. Stat. § 812.035(6), *see Escudero v. Hasbun*, 689 So. 2d 1144, 1145-46 (Fla. 3d DCA 1997), and to ensure the availability of the equitable relief Plaintiff seeks.
8. Based on the evidence presented by Plaintiff, the Court finds that a bond in the amount of \$50,000.00 is reasonable under the circumstances and considering the foreseeable damages for a wrongful injunction. Plaintiff shall file affidavits of service with the Court as this Order is served, and Plaintiff shall advise the Court promptly upon learning of accounts or other assets and transactions that are restrained by this Order so that the Court can assess whether the undertaking should be supplemented.

Having reviewed the Complaint, Plaintiff's Amended Ex-Parte Motion for Preliminary Injunction without Notice, and the Affidavits of Charles Zach and Klodjan Dollma, the Court hereby **ORDERS and ADJUDGES** that the Plaintiff's Motion is **GRANTED** according to the terms set forth below.

TEMPORARY INJUNCTION

1. Defendants, each of their agents, servants, employees, attorneys, partners, successors, assigns, and all other persons or entities through which they act or who act in concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, are hereby temporarily restrained from withdrawing, transferring, moving, selling, exchanging, encumbering, assigning, conveying, liquidating, or in any other manner disposing of any assets, whatever their present form that is contained in the wallets described in Appendix A to this Order.
2. OK Group, including OKX and related entities (collectively “OKX”), and its agents, servants, employees, attorneys, and all other persons or entities in active concert or participation with them who receive actual notice of this Order, are hereby ordered to freeze the following accounts or addresses attached hereto as Appendix A, as well as any other account or address owned, controlled, or associated with any of the Defendants, and any other account or address (including pooled accounts or “hot wallets”) in which assets, whatever their present form, that constitute or are derived from the any of the attached wallets are held, up to the aggregate value of \$38,000,000.00 or the equivalent in cryptocurrency.
3. Plaintiff’s attorneys shall cause a copy of this Order, together with a copy of the papers upon which it is based, to be served on or before May 27, 2024, upon the person or persons controlling the wallets identified in Appendix A to this Order via a special-purpose token or tracking link, delivered or airdropped to the wallets identified in Appendix A to this Order. The token and/or link will contain a hyperlink (the “Service Hyperlink”) to a website Plaintiff’s counsel will cause to be created, wherein Plaintiff’s counsel shall cause to be published this Order and papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute actual notice of this Order and sufficient service on the person or persons controlling the corresponding wallet addresses identified in Appendix of this Order.

4. OKX and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with the wallet addresses identified in Appendix A of this Order, including Defendants, and provide counsel for Plaintiff copy of such notice.

BOND TO BE POSTED

Pursuant to Fla. R. Civ. P. 1.610(b), Plaintiff shall maintain a bond in the amount of \$50,000.00, to be held in trust by Plaintiff's counsel, as payment of costs or damages to which Defendants may be entitled for a wrongful injunction or restraint, during the pendency of this Action or until further Order of this Court.

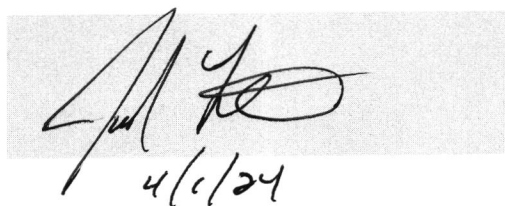
DURATION OF TEMPORARY INJUNCTION

The Temporary Injunction will remain in effect until further order of this Court. Any party against whom the Order was entered may move to dissolve or modify the Order at any time, and is entitled to a hearing on any such motion within 5 days of request.

SERVICE OF THIS ORDER AND RELATED FILINGS

Plaintiff shall serve a copy of the Complaint, the Motions and supporting Affidavits, and this Order on Defendants and any person or entity that may have possession or control of any property, property right, funds, or assets that may be subject to any provision of this Order within 120 days of the entry of this Order. Any person affected by the entry of this Order has the right to a hearing on

a motion to dissolve/modify this temporary injunction, which hearing shall be held within five (5) days of request.

A handwritten signature in black ink, appearing to be 'J. Teurbe-Tolon', is written over a light gray rectangular background. Below the signature, the date '4/1/24' is handwritten in black ink.

Electronic Service List

Jose J Teurbe-Tolon <jose@xanderlaw.com>

Jose J Teurbe-Tolon <service@xanderlaw.com>

Appendix A

67 Deposit Addresses

0x9cbe828e96f3ac8101200d5a0ca993718c4712fb
0xabe2881428fac82213ac94f20d790ede06fab644
0x0d65c2768fb2621b8c8d5f744b9ca9e9bfbfa0f7
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0x64e06b97e75aa2f0eaf233471cf32e2a5a4731f7
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EXHIBIT 5



AlaFile E-Notice

50-CV-2024-900163.00

Judge: CHRISTOPHER F ABEL

To: RILEY ROBERT RENFROE JR.
rob@rileyjacksonlaw.com

NOTICE OF COURT ACTION

IN THE CIRCUIT COURT OF MARSHALL COUNTY, ALABAMA

MICHAEL MASHKEVICH V. OLIVIA AVA ET AL
50-CV-2024-900163.00

A court action was entered in the above case on 6/4/2024 1:47:37 PM

ORDER

[Filer:]

Disposition: GRANTED
Judge: CFA
Notice Date: 6/4/2024 1:47:37 PM

ANGIE JOHNSON
CIRCUIT COURT CLERK
MARSHALL COUNTY, ALABAMA
424 BLOUNT AVE.
SUITE 201
GUNTERSVILLE, AL, 35976

256-571-7785
angie.johnson@alacourt.gov



IN THE CIRCUIT COURT OF MARSHALL COUNTY, ALABAMA

MICHAEL MASHKEVICH,

Plaintiff,

V.

Civil Action No. CV 2024-900163

OLIVIA AVA, EMMA MILLER,
and F.B. LEE, et al.,

Defendants.

ORDER FOR TEMPORARY RESTRAINING ORDER AND TO SHOW CAUSE

This matter is before the Court on Plaintiff's Emergency Motion for Temporary Restraining Order and for Order to Show Cause why a preliminary injunction should not issue.

The Court has reviewed the Motion and Brief in Support of the same, as well as the Affidavit of Michael Mashkevich, the Declaration of Charles Zach, and the Affidavit of Robert R. Riley, Jr. The Court is satisfied that pursuant to Alabama Rule of Civil Procedure 65(b), the issuance of this Order to Show Cause and Temporary Restraining Order is warranted without written or oral notice to the Defendants based on Plaintiff's setting forth specific facts of the likelihood of immediate and irreparable injury if time were afforded to allow Defendants to be heard in opposition to Plaintiff's Motion before ruling, and because notice prior to the issuance of this Order should not be required for the reasons set forth in Plaintiff's Motion and Brief in Support. Based on the foregoing, and for the reasons explained below, the Court GRANTS Plaintiff's Motion for a Temporary Restraining Order in its entirety this 4TH DAY OF JUNE, 2024.

It is hereby **ORDERED** that:

1. Plaintiff's motion for a temporary restraining order is GRANTED.
2. Defendants Olivia Ava, Emma Miller, F.B. Lee, and non-parties Binance Holdings Ltd., OKX, Gate.io, KuCoin, LBank, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any

other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, (collectively, the “Enjoined Parties”) are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any of the cryptocurrency or assets held in the wallet addresses listed in Appendix A of this Order, whether such property is located inside or outside of the United States of America.

3. Plaintiff’s attorneys shall cause a copy of this Order, together with a copy of the papers upon which it is based, to be served upon the person or persons controlling the wallets identified in Appendix A to this Order via a special-purpose token or equivalent blockchain currency or code (the “Service Token”), delivered or airdropped into the wallets identified in Appendix A to this Order. The Service Token will contain a hyperlink (the “Service Hyperlink”) to a website Plaintiff’s counsel will cause to be created, wherein Plaintiff’s counsel shall cause to be published this Order and all papers upon which it is based. The Service Hyperlink will include a mechanism to track when a person clicks on the Service Hyperlink. Such service shall constitute actual notice of this Order and sufficient service on the person or persons controlling the corresponding wallet addresses identified in Appendix A of this Order.

4. Binance Holdings Ltd., OKX, Gate.io, KuCoin, LBank, and any of their agents, servants, employees, attorneys, partners, successors, assigns, subsidiaries, or any other persons through which they act, or who act in active concert or participation with any of them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division or other device, or any of them, are hereby directed, within twenty-four (24) hours of receiving actual notice of this Order to provide notice of the same to any of their customers associated with the wallet addresses identified in Appendix A of this Order, including Defendants, and provide counsel for Plaintiff copy of such notice.

5. Pursuant to Ala. R. Civ. P. 65(b), the Defendants, Enjoined Parties and anyone else wishing to be heard, shall appear on **14TH DAY OF JUNE, 2024 AT 9:00 A.M. at the Marshall County Courthouse located in GUNTERVILLE, Second Floor, Courtroom #1** for a hearing where they may show good cause for why this Court should not enter a preliminary injunction further enjoining the withdraw, transfer, sale, encumbrance, or alteration of the cryptocurrency or assets held in the wallet addressed listed in Appendix A of this Order during the pendency of this action, whether such property is located inside or outside of the

United States of America, and imposing such additional relief as the Court deems just and proper.

6. The Defendants, the Enjoined Parties, and anyone else wishing to be heard, shall file with the Court and serve on Plaintiff's counsel any response, opposition, affidavits or declarations no later than seven (7) days prior to the hearing for preliminary injunction. If such documents are filed and served, Plaintiff may file a reply brief in support of its request for preliminary injunctive relief no later than two (2) days prior to the preliminary injunction hearing.

7. Defendants and the Enjoined Parties are hereby on notice that failure to timely serve and file an opposition, or failure to appear at the hearing, may result in the imposition of a preliminary injunction against them pursuant to Rule 65 of the Alabama Rules of Civil Procedure.

8. The temporary restraining order set forth in this Order will expire **TEN DAYS (10 DAYS)** from its entry unless, for good cause shown, this Order is extended or Defendants consent that it should be extended for a longer period. However, the Court may, upon demonstration of good cause by any party-in-interest, shorten or lift this Order.

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

10. Notice was not provided to Defendants prior to issuance of this Order either because their identities have not yet been ascertained or because the Court has determined that providing such notice would cause a likelihood of immediate, irreparable injury or loss, particularly through the dissipation of the assets listed in Appendix A of this Order.

11. Pursuant to Ala. R. Civ. P. 65(c), the Court in its discretion determines that no bond is required.

ORDERED this 4th day of JUNE, 2024.

/s/ Christopher F. Abel
CHRISTOPHER F. ABEL
CIRCUIT JUDGE

APPENDIX A

Binance Holdings

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OKX

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Gate.io

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KuCoin

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LBank

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