

1 William A. Delgado (SBN 222666)  
wdelgado@dtolaw.com  
2 Nicole G. Malick (SBN 335754)  
nmalick@dtolaw.com  
3 DTO LAW  
915 Wilshire Boulevard, Suite 1950  
4 Los Angeles, California 90017  
Telephone: (213) 335-6999  
5 Facsimile: (213) 335-7802

6 Shaun Martin (SBN 158480)  
smartin@sandiego.edu  
7 5998 Alcala Park, Warren Hall  
San Diego, California 92110  
8 Telephone: (619) 260-2347  
Facsimile: (619) 260-7933  
9

10 Attorneys for Plaintiff  
YOUNES YOUNES

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF LOS ANGELES, CENTRAL DISTRICT  
13

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

16 Plaintiff,

17 v.

18 ELVIRA TAYLOR and DOES 1 through 200  
19 inclusive,

20 Defendants.  
21

Case No. 24STCV12520

**PLAINTIFF'S *EX PARTE* APPLICATION  
TO CONTINUE CASE MANAGEMENT  
CONFERENCE AND CLASS  
CERTIFICATION HEARING**

[Declarations of Shaun Martin and Albina  
Giuttari and Proposed Order Filed  
Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

Date: March 21, 2025  
Time: 8:30 A.M.  
Place: Dept. 6  
312 N. Spring Street,  
Los Angeles, CA 90012

Action Filed: May 17, 2024  
Trial Date: None

1 Plaintiff respectfully requests that the case management conference and class certification  
2 hearing in this matter currently scheduled for April 2, 2025 at 11:00 a.m. be moved to April 29, 2025  
3 at 11:00 a.m., or to such alternative date as may be convenient for this Court. Defendants have not  
4 appeared in this action, so no opposition to this request is expected.

5 This is a case in which scam artists created a fake online work platform to engage in “pig  
6 butchering” to steal over \$2.9 million in cryptocurrency from approximately 325 unsuspecting  
7 victims, including over \$400,000 from the named plaintiff (Mr. Younes) himself. Plaintiff previously  
8 anticipated filing his motion for class certification in early March, but workload and calendaring  
9 issues subsequently interfered with this planned schedule. Declaration of Shaun Martin (“Martin  
10 Decl.”), ¶ 2.

11 Plaintiff has fully prepared, and is able to file and serve today, his motion for class  
12 certification; however, because Rule 3.764 requires that such motions be heard at least 28 days after  
13 filing, Plaintiff respectfully requests that the existing hearing date of April 2, 2025 be moved to April  
14 29, 2025, or whatever other date is most convenient for this Court, in order to satisfy Rule 3.764.  
15 Martin Decl. ¶¶ 3, 5; *see* Cal. Rules of Court, Rule 3.764(c)(1).

16 Plaintiff has provided notice of the present *ex parte* application via posting to the case-related  
17 website authorized by this Court. Declaration of Albina Giuttari, ¶ 2. This method of service was  
18 approved by this Court’s June 27, 2024 Order, which authorized service by posting to a website  
19 maintained by Plaintiff’s counsel and by delivering a special purpose token or similar device to  
20 Defendants’ wallets containing a hyperlink directing to the same website. Martin Decl. ¶ 4. No  
21 opposition is expected to either this *ex parte* request or to the ultimate class certification motion.  
22 (Defendants have never appeared, and their defaults will be taken after the motion for class  
23 certification is heard.). Martin Decl. ¶ 4. Any order on this application can similarly be posted on  
24 the case-related website.

25 A proposed Order is attached.  
26  
27  
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1 Dated: March 18, 2025

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4 Shaun P. Martin, Esq.  
5 5998 Alcala Park, Warren Hall  
6 San Diego, CA 92110  
7 T: (619) 260-2347 | F: (619) 260-7933

8 *Counsel for Plaintiff Younes Younes*