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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.

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

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1 including the owners of each of the wallets identified in Appendix A of this Order through a
2 special purpose token or similar device delivered or airdropped into each the wallets identified in
3 Appendix A of this Order, and each of these service tokens will contain a hyperlink to a website
4 maintained by Plaintiff's counsel that will include both this Order and all papers upon which it is
5 based. The hyperlink will include a mechanism to track when a person clicks on the hyperlink.
6 This process shall constitute actual notice of this Order and sufficient service on the person or
7 persons controlling the corresponding wallet addresses identified in Appendix A of this Order.

8 Proof of such service shall be filed with the Court no later than _____ days before
9 the hearing on Plaintiff Younes Younes's Order to Show Cause.

10 Any opposing papers shall be filed with the Court and served upon Plaintiff
11 Younes Younes by the Enjoined Parties no later than _____ days before such
12 hearing date.

13 Any reply papers shall be filed with the Court and served on the Enjoined Parties by
14 Plaintiff Younes Younes no later than _____ days before such hearing date.

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

18 **TEMPORARY RESTRAINING ORDER**

19 **IT IS HEREBY ORDERED** that, pending the hearing on Plaintiff Younes Younes'
20 application for a preliminary injunction:

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

3 Plaintiff's attorneys shall cause a copy of this Temporary Restraining Order, together
4 with a copy of the papers upon which it is based, including the Verified Complaint, to be served
5 upon the person or persons controlling the wallets identified in Appendix A of this Order via a
6 special purpose token or similar device delivered or airdropped into each of the wallets identified
7 in Appendix A of this Order, and each of these service tokens will contain a hyperlink to a
8 website maintained by Plaintiff's counsel that will include both this Order and all papers upon
9 which it is based. The hyperlink will include a mechanism to track when a person clicks on the
10 hyperlink. This process shall constitute actual notice of this Order and sufficient service on the
11 person or persons controlling the corresponding wallet addresses identified in Appendix A of this
12 Order.

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

20 **IT IS FURTHER ORDERED** that:

21 This Temporary Restraining Order shall expire on _____ unless
22 extended by the Court.

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

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

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

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6 **IT IS SO ORDERED.**

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8 DATED: _____

By: _____
Judge of the Superior Court

APPENDIX A

OKX

- TXPiHTvpCzFTEvh5SkbwUuSuty2AfigdcY
- TKcqHtVbF11ZhsqxYaBpYQ9tdEQ9RTXWhF

Binance

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