

CAUSE NO. 25-CV-0357

FILED
2025 MAR 11 AM 11:17
COPY
D. D. [Signature]
DISTRICT CLERK
GALVESTON COUNTY, TEXAS

DR. RISPBA MCCRAY-GARRISON, §
STACEY BROWN, WEN CAO, JESSECA §
DICKERSON, NARESH GORANTLA, §
MATHEWS HIZON, JORDAN PARTIER, §
GREG RICHARDS, REITTA SEIDEL, §
MARIA SISSON, SAMANTHA KAUK §
VINCENT, ALEXANDRA MURRIETTA, §
PRASHANT KATYAL, STANISLAV §
TSOY, NEHA MALHOTRA, KYLE §
ADAMS, HILARIO FLORES, LANE §
GARNER, CHETAN JOSHI, §
BALAKRISHNA KONDURU, §
ABHISHEK SINGH, JOSE VASQUEZ, §
and BILL YOUNG, **Plaintiffs,** §

IN THE DISTRICT COURT OF

GALVESTON COUNTY, TEXAS

V. §

"TOM SHELDON HALEY" [WhatsApp: §
+1-470-697-1565], "JINGYI LI" §
[WhatsApp user], "JINGQIU NING" §
[WhatsApp: +1-973-282-8222], "KSENIA" §
[WhatsApp: +1-213-661-3580], §
"NINA/ANNIE" [WhatsApp: +1-917-420- §
3859], "ZOE" [WhatsApp: +1-332-272- §
4264, +1-626-630-9256, +1-646-294- §
9168], "GRACE LIN" [+1-415-510-9176], §
"SAM BENNETT" [Telegram user], §
"CAROLINE MARTIN" [WhatsApp: +1- §
458-250-9980], "MARK/PROFESSOR" §
[WhatsApp: +1-740-491-1166, Telegram: §
@Mark44777], "ASSISTANT ERIN" §
[WhatsApp: +1-234-301-8088], "EMILY §
TRENT" [WhatsApp user], "DAVID" §
[WhatsApp user], "SHELBY PETTY" §
(IMPERSONATOR) [WhatsApp: +44- §
7449-0075], "DIANNE HOLLISTER" §
[Email: diannehollister0@gmail.com], §
"MARCO ROSSI" [WhatsApp user], §
"EMILY" [WhatsApp: +1-646-296-7124], §
"DAVID" [WhatsApp: +1-778-595-0741], §
"LAUREN CHRISTIE" [WhatsApp: +1- §
503-421-5594, +1-503-752-7094, +1-404- §
493-5667, +1-503-490-6297, Telegram: §

10TH JUDICIAL DISTRICT

COMPLETED

25 - CV - 0357
DCTRORD
Temporary Restraining Order - OCA
2947775


TEMPORARY RESTRAINING ORDER

On this day, the Court considered Plaintiffs' ex parte application for temporary restraining order. Plaintiffs appeared through their attorney of record and presented the application. The application was conducted on an ex parte basis pursuant to Tex.R.Civ.P. 680.

The Court, having read and considered Plaintiffs' verified ex parte application for temporary restraining order and supporting evidence, is of the opinion that it clearly appears from the facts set forth in that application that:

1. Plaintiffs will likely recover from Defendants.
2. Harm to Plaintiffs is imminent, and if the Court does not issue the temporary restraining order ("TRO"), they will be irreparably injured because Defendants will transfer their cryptocurrency assets to unknown and untraceable locations, causing irreparable injury to Plaintiffs.
3. Plaintiffs have demonstrated to the satisfaction of this Court that they will suffer immediate and irreparable harm for which they have no adequate remedy at law in the event Defendants are not restrained from maintaining the status quo as it relates to the accounts identified by Plaintiffs.
4. Plaintiffs have alleged, and the Court finds that they have a substantial likelihood of recovery for the theft of their cryptocurrency assets as described in Exhibits 1 through 48.
5. The Court further finds that issuance of this TRO on an ex parte basis is necessary to prevent the Defendants from transferring, dissipating or hiding the cryptocurrency assets described in these Exhibits.

6. Exhibits 1 through 48 provide transactions showing transfers from the defendants' cryptocurrency wallets (which received illicit funds from victims) into cryptocurrency wallets owned and operated by centralized exchanges. These exchange-operated wallets act as intermediaries, facilitating the movement of assets between the blockchain and the exchange. They act as clearing accounts, and the assets the defendants acquired from the victims passed through these exchange-operated wallets as they ultimately moved into the defendants' accounts internal to the centralized exchanges.

7. All Exhibits are incorporated as if fully set out herein.

8. The Court further finds that in order to issue a TRO the Plaintiffs posted bond in the amount of \$1,000 before the hearing date. That bond serves as bond for this extension of the TRO.

Based upon the foregoing, and the other facts and information contained herein, in the Plaintiffs' Application, and in the Plaintiffs' Original Verified Petition, it is ORDERED that:

(A) Defendants, non-parties¹ Binance Holdings Limited ("Binance"), Binance.US, Bitfinex, Bitget, Bithumb, Bitkub, BitMex, Bitso, Bitpanda, Bitstamp, Bittrex, BTSE, Bullish, Bybit, Cash App, CEX.io, ChainUp, ChangeHero, ChangeNow, Coinbase, Coinbase Prime, CoinCola, Coinlist, CoinOne, CoinsPaid, CoinSpot, Crypto.com, Cryptomus, Deribit, Gate.io, Gemini, HitBTC, HTX, Kot4ex, Kraken, Kucoin, LBank, Luno, MaicoIn, MaskEx, MEXC, Newton, OKX, Poloniex, Revolut, Robinhood, Rocketr, Sellix, Transak, and WhiteBIT, as listed on Exhibits 1-48, and any of their agents, servants, employees, attorneys, partners, successors,

¹ These non-parties are enjoined pursuant to Rule 683 of the Texas Rules of Civil Procedure because they are working in active concert and participation with the named Defendants, and because they will receive actual notice of this Order by personal service or otherwise.

assigns, subsidiaries, affiliates, joint venturers, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the "Enjoined Parties"),

are HEREBY, for any wallet that has a balance of over \$5000.00:

- Temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise disposing of any cryptocurrency or assets held in the Exchange-owned final destination wallets ("To Addresses") identified in Exhibits 1 through 48 of this Order in an amount that would reduce the balance below \$5,870,983 million. The Enjoined Parties may only withdraw, transfer, or otherwise dispose of assets that exceed the \$5,870,983 million threshold.
- Temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise altering any cryptocurrency or assets currently held by the exchanges in Exchange-owned final destination wallets ("To Addresses") identified in Exhibits 1 through 48 that were received from any wallets identified in Exhibits 1 through 48 of this Order in an amount that would reduce the balance below \$5,870,983 million.
- Defendants, non-parties, Binance Holdings Limited ("Binance"), Binance.US, Bitfinex, Bitget, Bithumb, Bitkub, BitMex, Bitso, Bitpanda, Bitstamp, Bittrex, BTSE, Bullish, Bybit, Cash App, CEX.io, ChainUp, ChangeHero, ChangeNow, Coinbase, Coinbase Prime, CoinCola, Coinlist, CoinOne, CoinsPaid, CoinSpot, Crypto.com, Cryptomus, Deribit, Gate.io, Gemini, HitBTC, HTX, Kot4ex, Kraken, Kucoin, LBank, Luno, Maicoin, MaskEx, MEXC, Newton, OKX, Poloniex, Revolut, Robinhood, Rocketr, Sellix, Transak, and WhiteBIT, as listed on Exhibits 1 - 48, and any of their agents,

servants, employees, attorneys, partners, successors, assigns, subsidiaries, affiliates, joint venturers, or any other person(s) through which they act, or who act in active concert with them and who receive actual notice of this Order (collectively, the "Enjoined Parties") -- must utilize Know Your Customer ("KYC") information to identify the defendants' accounts internal to the exchange and place a temporary restraint on them.

The defendants are hereby temporarily restrained from withdrawing, transferring, selling, encumbering, or otherwise disposing of any cryptocurrency or assets held in their accounts internal to the above-listed exchanges.

- The Enjoined Parties may transfer or otherwise distribute only those amounts in excess of \$5,870,983 million.

(B) Following the actions taken in paragraph (A) above, Plaintiffs' attorneys, investigators, or others working on their behalf shall cause a copy of this Temporary Restraining Order, together with a copy of the papers upon which it is based, as well as Plaintiffs' Verified Original Petition, Application for Temporary Restraining Order, and Application for Temporary and Permanent Injunctions ("Petition"), to be served upon the person or persons controlling the wallets identified in Exhibits 1 through 48 of this Order via transferring a special token, use smart contracts or metadata posted to the blockchain in a transaction or storing a message on the blockchain through OP_RETURN or similar code into each of the wallets identified in these Exhibits, and each of these service tokens or notification will contain a hyperlink to a website maintained by Plaintiffs' counsel, counsel's investigators, or others working on their behalf that will include both this Order and all papers upon which it is based. The hyperlink will include a mechanism to track when a person clicks on the hyperlink. This process shall constitute actual notice of this Order and

sufficient service of process on Defendants and the person or persons controlling the corresponding wallet addresses identified in Exhibits 1 through 48 of this Order.

(C) In addition, pursuant to Tex.R.Civ.P. 683, non-parties Binance Holdings Limited (“Binance”), Binance.US, Binance.US, Bitfinex, Bitget, Bithumb, Bitkub, BitMex, Bitso, Bitpanda, Bitstamp, Bittrex, BTSE, Bullish, Bybit, Cash App, CEX.io, ChainUp, ChangeHero, ChangeNow, Coinbase, Coinbase Prime, CoinCola, Coinlist, CoinOne, CoinsPaid, CoinSpot, Crypto.com, Cryptomus, Deribit, Gate.io, Gemini, HitBTC, HTX, Kot4ex, Kraken, Kucoin, LBank, Luno, MaicoIn, MaskEx, MEXC, Newton, OKX, Poloniex, Revolut, Robinhood, Rocketr, Sellix, Transak, and WhiteBIT, and/or any of their agents, servants, employees, attorneys, partners, affiliates, successors, assigns, subsidiaries, affiliates, joint venturers, or any other persons through which they act, or who act in active concert or participation with any them, who receive actual notice of this Order by personal service or otherwise, 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 any of the wallet addresses identified in Exhibits 1 through 48 of this Order and provide counsel for Plaintiffs a copy of such notice. This process shall also constitute actual notice of this Order and sufficient service of process on Defendants.

(D) Proof of such service shall be filed with the Court prior to hearing on Plaintiffs' application for temporary injunction.

It is further ORDERED that:

(a) Plaintiffs' application for temporary injunction is set for hearing on the docket of the District Court at 600 59th Street, Galveston TX ADDRESS on the 25th day of March, 2025 at 9:30 CLOCK A m.

(b) At that hearing, Plaintiffs are permitted to present expert testimony by Zoom or other electronic means via link which will be provided by the Court in advance of the hearing.

(c) As described above, notice was not provided to Defendants prior to issuance of this Order either because their identities have not yet been ascertained or because this 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 Exhibits 1 through 48 of this Order. Notice to Defendants would be fruitless.

9. This order is entered on March 11, 2025 at 11:09 ~~am/pm~~

10. This order expires 14 days from the date of entry or on the 25th day of March, 2025 whichever comes later.

Dated this 11th day of March, 2025.

[Handwritten Signature]

JUDGE PRESIDING



John D. Kinard, District Clerk and Custodian of Records for District Courts of Galveston, County, Texas do hereby certify that the foregoing is a true and correct copy of the original record, now in my lawful custody and filed in this office on the 11th day of March, 2025. witness my official hand and seal of office this 11th day of March, 2025.
JOHN D. KINARD, DISTRICT CLERK
Galveston County, Texas
By [Handwritten Signature] Deputy