

HCA 625 /2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN WHO RECEIVED

CRYPTOCURRENCY ORIGINATING

FROM THE BITCOIN ADDRESSES

DEFINED AT PARAGRAPH 4 OF

THE INDORSEMENT OF CLAIM

UP TO 26 MARCH 2025

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS

OR COMPANIES OR OTHER ENTITIES WHO ARE

IDENTIFIED IN THE BINANCE.COM PLATFORM'S

TERMS AND CONDITIONS AS BINANCE OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

O.20 rr.5 & 8, O. 29 r.1)
O.65 rr.4 & 9, s.21 of)
Cap. 8 and Inherent)
jurisdiction)

INTER-PARTES SUMMONS

LET ALL PARTIES CONCERNED appear before the Honourable Mr Justice David Lok of the Court of First Instance sitting in Chambers (open to the public) at the High Court of Hong Kong, High Court Building, 38 Queensway, Hong Kong on 19th August 2025 at 9:30 am, on the hearing of an application on the part of the Plaintiff for an order that:

1. As against the 7th Defendant, the Order of the Honourable Mr Justice Lok dated 30 July 2025 be continued until the conclusion of the trial of the action or further order of the Court;
2. The Amended Writ of Summons and the Amended Statement of Claim be amended as annexed to this inter-partes summons;
3. As against the 1st Defendant:-

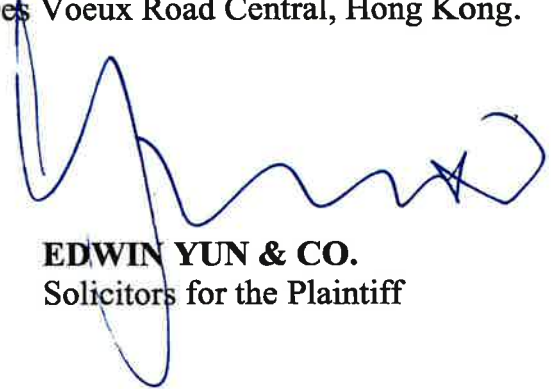
- 3.1. Paragraph 17 of the Order of the Honourable Mr Justice Lok dated 27 March 2025 be varied and amended as annexed to this inter-partes summons; and
 - 3.2. The heading of the Order of the Honourable Mr Justice Lok dated 27 March 2025 be varied and amended to the effect that the name of the 1st Defendant be changed to “PERSON(S) UNKNOWN CATEGORY B”;
4. As against the 2nd Defendant, the 2nd Defendant must disclose (by way of affidavit within 14 days of the service of this Order) to the Plaintiff:-
 - 4.1. The full name(s), address, particulars, email address(es), IP address(es) and a full set of Know Your Client documents of the client account(s) associated with the D7 Addresses defined at Paragraph 3A of the Re-Amended Statement of Claim (“**the D7 Account(s)**”);
 - 4.2. The account balance as at the date of the Order, and the complete transaction log of the D7 Account(s), including but not limited to the fiat and/or cryptocurrency deposits and withdrawals for the period starting from 12 March 13:50 UTC to the date of this Order.; and
 - 4.3. Any bank accounts associated with the D7 Account(s) known to the 2nd Defendant, including the name and address of the relevant bank;
5. The 2nd Defendant be indemnified of reasonable expenses to comply with Paragraph 4 of this Order;
6. Service of this inter-partes summons in relation to D1, D4, D5 and D6 be dispensed with;
7. Leave be granted to the Plaintiff to issue and serve the Concurrent Re-Amended Writ of Summons out of the jurisdiction as per the Orders of the Honourable Mr Justice Lok dated 27 March 2025 and 30 July 2025;
8. Liberty to apply;

9. Costs be reserved.

Dated 8th August 2025

Registrar

This Summons is taken out by Messrs. Edwin Yun & Co., Solicitors for the Plaintiff of Room 1101, 11th Floor, Nos. 54-58 Des Voeux Road Central, Hong Kong.

A handwritten signature in blue ink, appearing to be 'Edwin Yun', written over the printed name of the solicitors.

EDWIN YUN & CO.
Solicitors for the Plaintiff

Estimated time: 30 minutes

To: The Registrar, High Court

and

The 2nd Defendant by email to legal@binance.com

and

Messrs. DLA Piper
Solicitors for the 3rd Defendant
5th Floor Three Exchange Square
8 Connaught Place Central
Hong Kong

and

The 7th Defendant

By NFT Airdrop to the Binance ETH

Addresses defined at Paragraph 3A of

the Amended Statement of Claim

(via a hyperlink to <http://www.hca625of2025.com>)

DRAFT AMENDED PARAGRAPH 17 OF THE
INJUNCTION ORDER AGAINST D1

...

17. The Plaintiff may serve the concurrent re-amended writ of summons, this injunction, and subsequent court documents and correspondence:-

17.1. To D1 by Bitcoin Ordinal Airdrop to ~~the Subject~~ the D1 Addresses defined at Paragraph ~~4 of the Indorsement of Claim~~ 2 of the Re-Amended Statement of Claim.

...

HCA 625/2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO.625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN WHO RECEIVED
CRYPTOCURRENCY ORIGINATING
FROM THE BITCOIN ADDRESSES
DEFINED AT PARAGRAPH 4 OF
THE INDORSEMENT OF CLAIM
UP TO 26 MARCH 2025

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE
OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

INTER-PARTES SUMMONS

Filed on : 8th August, 2025

Edwin Yun & Co.,
Solicitors for the Plaintiff,
Room 1101, 11th Floor,
Nos.54-58 Des Voeux Road Central, Hong Kong.
Tel : 2815 5116 Fax : 2815 5269
Ref : Y2251839

Claim nature:
A. * ~~Monetary Claim/Non-Monetary Claim~~/Mixed Claim
B. Trust

Amended as in red this 31st July
pursuant to the Order made by The
Honourable Mr Justice dated 30th July
2025

No. 1
Draft Re-Amended Writ of Summons
(O. 6 r. 1)

HCA 625 / 2025

Registrar

Re-amended as in green this August
2025 pursuant to the Order made by
The Honourable Mr Justice Lok
dated August 2025.

**IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE**

ACTION NO. 625 OF 2025

BETWEEN Registrar

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
~~CRYPTOCURRENCY ORIGINATING~~
~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
~~THE INDORSEMENT OF CLAIM~~
~~UP TO 26 MARCH 2025~~

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OR COMPANIES OR OTHER ENTITIES WHO ARE
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2nd Defendant

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OR OTHER ENTITIES THAT OPERATE GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

TO the 1st Defendant PERSON(S) UNKNOWN CATREGORY B WHO RECEIVED CRYPTOCURRENCY ORIGINATING FROM THE BITCOIN ADDRESSES DEFINED AT PARAGRAPH 4 OF THE INDORSEMENT OF CLAIM UP TO 26 MARCH 2025 of unknown address

TO the 2nd Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES WHO ARE IDENTIFIED IN THE BINANCE.COM PLATFORM'S TERMS AND CONDITIONS AS BINANCE OPERATOR of unknown address

TO the 3rd Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE COINBASE.COM of unknown address

TO the 4th Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE OKX.COM of unknown address

TO the 5th Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE GEMINI.COM of unknown address

TO the 6th Defendant BITCOINFORME S.L. TRADING AS BIT2ME of Calle Germán Bernacer, 69, 03203, Elche, Alicante, Spain of unknown address

TO the 7th Defendant PERSON(S) UNKNOWN CATEGORY A of unknown address

THIS RE-AMENDED WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the back.

Within (21 days) after the service of this Re-Amended Writ on you, counting the day of service, you must either satisfy the claim or return to the Registry of the High Court the accompanying RE-AMENDED ACKNOWLEDGMENT OF SERVICE stating therein whether you intend to contest these proceedings or to make an admission.

If you fail to satisfy the claim or to return the Re-Amended Acknowledgment within the time stated, or if you return the Re-Amended Acknowledgment without stating therein an intention to contest the proceedings or to make an admission, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

*[If you intend to make an admission, you may complete an appropriate form enclosed in accordance with the accompanying Directions for Re-Amended Acknowledgment of Service.]

Issued from the Registry of the High Court this 28th day of March 2025.

Registrar

Note: – This Writ may not be served later than 12 calendar months beginning with that date unless renewed by order of the Court.

IMPORTANT

Directions for Re-Amended Acknowledgment of Service are given with the accompanying form.

RE-AMENDED INDORSEMENT OF CLAIM

1. The Plaintiff is the victim of Bitcoin theft.
2. She is the plaintiff in High Court Action Number 2295 of 2019, where her case is that Mr LEUNG Wing Hei ("**Mr Leung**") (the defendant in that case) has stolen around 1,000 Bitcoins from her in 2018 ("**1,000 Bitcoins**").
3. In 2022, the Hong Kong Court of First Instance ordered Mr Leung not to dispose of around 364.46378963 Bitcoins that he still held from the 1,000 Bitcoins.
4. Prior to 12 March 2025, of the around 364.46378963 Bitcoins, around 361 Bitcoins were held in the following bitcoin addresses:
 - 4.1. around 300 in the address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw
 - 4.2. around 38 in address 3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam
 - 4.3. around 23 in bitcoin address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu("361 Bitcoins") ("**Subject Addresses**")
5. On 12 March 2025, the 361 Bitcoins were transferred away to the 1st Defendant, who own and operate the cryptocurrency address "1KGnHUhhqw7P7QPDcXyPdownSTg687Fe8N9" ("**the D1 Address**") and therefore stolen from the Subject Addresses. Mr Leung denies knowledge or responsibility of these transfers.
6. After the discovery of the theft, the Plaintiff instructed investigators to investigate the recipients of the 361 Bitcoins.
7. On 24 March 2025, the Plaintiff received a report from her investigator Mr Umberto BUONORA of Recoveris.io a "*Forensic Memo on Fraud Incident*" ("**Report**"). The Report shows that:-
 - 7.1. a "*complex and vast layering scheme*" had taken place involving around 365 identifiable transfers within around 8 days on an initial investigation

7.2. parts of the 361 Bitcoins were transferred to accounts associated with the 2nd, 3rd, 4th, 5th, 6th Defendants, who are centralised cryptocurrency exchanges with know your customer (“KYC”) policies.

7A. Parts of the 361 Bitcoins were transferred to the 7th Defendant(s), namely person(s) unknown who own or operate the cryptocurrency addresses “0x16e4c3721d65701542ff5ae4c959fceb1d9fe2b”, “0xbf91ca583ec6b3b37560b3781f2810965184ddd6”, and “0x5a709e0f5f508fbb56c333589d5dda835b1a61c1”(“the D7 Addresses”).

8. Investigations are ongoing, and the Plaintiff will apply to join further parties if necessary.
9. By reason of the above, the Defendants holds the 361 Bitcoins and their traceable proceeds on constructive trust on behalf of the Plaintiff.
10. The Plaintiff seeks recovery of the 361 Bitcoins and damages from the Defendants and will rely on fraud, conversion, misuse of private information, unjust enrichment, monies had and received, constructive trust, and equity.

AND THE PLAINTIFF CLAIMS AGAINST THE DEFENDANTS FOR:

- (1) A declaration that the 361 Bitcoins paid to the 1st and 7th Defendants belonged to the Plaintiff at the time of receipt
- (2) A declaration that the Defendants as trustees or constructive trustees are liable to account for the 361 Bitcoins, including their traceable proceeds thereof, and an order that that the Defendants pay to the Plaintiff those monies, payments and profits due on taking of account
- (3) Damages for dishonest assistance in the misappropriation of the 361 Bitcoins
- (4) Damages for the Defendants’ unjust enrichment at the Plaintiffs’ expense
- (5) Damages for knowing receipt of the funds beneficially owned by the Plaintiff and account to the Plaintiff for the same

- (6) An order that the Defendants do transfer to the Plaintiff such funds held and/or received
- (7) All necessary consequential or further accounts, inquiries or orders
- (8) Interest on any sum ordered to be paid by any party at such rate and for such period as this Honourable Court deems pursuant to Sections 48 and 49 of the High Court Ordinance
- (9) Further and other relief
- (10) Costs

~~Dated 26 March 2025~~

~~**JASPER WONG**
Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.

~~**EDWIN YUN & CO**
Solicitors for the Plaintiff~~

~~Dated 30 July 2025~~

~~**JUSTIN W.T. LAM**
Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.

~~**EDWIN YUN & CO**
Solicitors for the Plaintiff~~

Dated August 2025

JUSTIN W.T. LAM
Counsel for the Plaintiff

EDWIN YUN & CO
Solicitors for the Plaintiff

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this General Indorsement are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 26th day of March, 2025.~~

~~日期：2025 年 3 月 26 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this Amended Indorsement of Claim are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 30th day of July, 2025.~~

~~日期：2025 年 7 月 30 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

I, YAN YU YING, the Plaintiff, believes that the facts stated in this Re-Amended Indorsement of Claim are true.

本人，忻汝英，原告人，真誠相信上述所述的事實為真實。

Dated this day of August, 2025.

日期：2025 年 8 月 日

YAN YU YING

請注意

因這是法律文件，忽視它可帶來嚴重後果。如有疑問，請儘早向發出文件的法院登記處：

香港金鐘道 38 號高等法院低層 1 樓查詢。

你亦應考慮聽取律師的意見或是申請法律援助。

TAKE NOTICE

This is a legal document. The consequences of ignoring it may be serious. If in doubt, you should enquire as soon as possible at the Registry of the Court issuing the document, namely :

LG1, High Court Building, 38 Queensway, Hong Kong.

You should also consider taking the advice of a Solicitor or applying for Legal Aid.

Re-Amended Acknowledgment of Service of Re-Amended Writ of Summons
(O. 12 r. 3)

Directions for Re-Amended Acknowledgment of Service

1. The accompanying form of Re-Amended ACKNOWLEDGMENT OF SERVICE should be detached and completed by a Solicitor acting on behalf of the Defendant or by the Defendant if acting in person. After completion it must be delivered or sent by post to the Registry of the High Court at the following address: –

“LG1, High Court Building, 38 Queensway, Hong Kong.”

2. A Defendant who states in his Re-Amended Acknowledgment of Service that he intends to contest the proceedings MUST ALSO file a DEFENCE which must be written in either the Chinese or the English language with the registry and serve a copy thereof on the Solicitor for the Plaintiff (or on the Plaintiff if acting in person).

If an Re-Amended Statement of Claim is indorsed on the Re-Amended Writ (i.e. the words “Re-Amended Statement of Claim” appear at the top of the back), the Defence must be filed and served within 28 days after the time for acknowledging service of the Re-Amended Writ, unless in the meantime a summons for judgment is served on the Defendant.

If an Re-Amended Statement of Claim is not indorsed on the Re-Amended Writ, the Defence must be filed and served within 28 days after an Re-Amended Statement of Claim has been served on the Defendant. If the Defendant fails to file and serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

The Defendant’s defence must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, you may admit the Plaintiff’s claim in whole or in part by completing Form No. 16 or 16C (as the case may require) accompanying the Re-Amended Writ of Summons.

A completed Form No. 16 or 16C must be filed with the Registry of the High Court and served on the Plaintiff [or the Plaintiff’s Solicitors] within the period for service of the Defence.

4. A Defendant who wishes to dispute the jurisdiction of the Court of First Instance in the proceedings or to argue that the Court of First Instance should not exercise its jurisdiction in the proceedings, and wishes to apply to the Court of First Instance for an order staying the proceedings, must give notice of intention to defend the proceedings and make the application within the time limited for service of a defence.

See attached Notes for Guidance

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Re-Amended Acknowledgment of Service and return it to the Registry of the High Court.
- [2. For the purpose of calculating the period of 14 days for acknowledging service, an Re-Amended writ served on the Defendant personally is treated as having been served on the day it was delivered to him and an Re-Amended writ served by post or by insertion through the Defendant's letter box is treated as having been served on the seventh day after the date of posting or insertion.]

(Note: Not applicable if the defendant is a company served at its registered office.)
3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Re-Amended Writ of Summons)".
4. Where the Defendant is a FIRM and a Solicitor is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.
6. Where the Defendant is a LIMITED COMPANY the form must be completed by a Solicitor or by someone authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without a Solicitor acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL Patient, the form must be completed by a Solicitor acting for a guardian ad litem.
8. A Defendant acting in person may obtain help in completing the form at the Registry of the High Court.
9. These notes deal only with the more usual cases. In case of difficulty a Defendant in person should refer to paragraph 8 above.

IN THE HIGH COURT OF THE
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COURT OF FIRST INSTANCE
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Between

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
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~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
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~~UP TO 26 MARCH 2025~~

1st Defendant

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5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

See Notes 1,
3, 4 and 5.

-
1. State the full name of the Defendant by whom or on whose behalf the service of the Re-Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

-
3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Re-Amended Writ of Summons.

Where words
appear between
square brackets,
delete if
inapplicable

Service of the Re-Amended Writ is acknowledged accordingly.

(Signed) [Solicitor] ()
[Defendant in person]

Address for service

Notes as to Address for Service

Solicitor. Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong.

Defendant in person. Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong, he must give an address in Hong Kong where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.

EDWIN YUN & CO.
Solicitors for the Plaintiff,
Room 1101, 11th Floor,
Nos.54-58 Des Voeux Road Central,
Hong Kong.
Ref : Y2251839
Tel : 2815 5116
Fax : 2815 5269

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See Notes 1,
3, 4 and 5.

-
1. State the full name of the Defendant by whom or on whose behalf the service of the Re-Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

-
3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Re-Amended Writ of Summons.

Where words
appear between
square brackets,
delete if
inapplicable

Service of the Re-Amended Writ is acknowledged accordingly.

(Signed) [Solicitor] ()
[Defendant in person]

Address for service

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EDWIN YUN & CO.
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Plaintiff

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PERSON(S) UNKNOWN CATEGORY A

7th Defendant

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

See Notes 1,
3, 4 and 5.

-
1. State the full name of the Defendant by whom or on whose behalf the service of the Re-Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Re-Amended Writ of Summons.

Where words
appear between
square brackets,
delete if
inapplicable

Service of the Re-Amended Writ is acknowledged accordingly.

(Signed) [Solicitor] ()
[Defendant in person]

Address for service

Notes as to Address for Service

Solicitor. Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong.

Defendant in person. Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong, he must give an address in Hong Kong where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.

EDWIN YUN & CO.
Solicitors for the Plaintiff,
Room 1101, 11th Floor,
Nos.54-58 Des Voeux Road Central,
Hong Kong.
Ref : Y2251839
Tel : 2815 5116
Fax : 2815 5269

No. 16
Admission (liquidated amount)
(O. 13A rr. 4(2), 5(2) & 13(2))

HCA 625 / 2025

**IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 625 OF 2025**

Between

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B

~~WHO RECEIVED~~

~~CRYPTOCURRENCY ORIGINATING~~

~~FROM THE BITCOIN ADDRESSES~~

~~DEFINED AT PARAGRAPH 4 OF~~

~~THE INDORSEMENT OF CLAIM~~

~~UP TO 26 MARCH 2025~~

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS

OR COMPANIES OR OTHER ENTITIES WHO ARE

IDENTIFIED IN THE BINANCE.COM PLATFORM'S

TERMS AND CONDITIONS AS BINANCE OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

Explanatory Note

1. The only claim the plaintiff has made against you is for a liquidated amount of money. You may admit the plaintiff's claim in whole or in part by completing this form –
 - (a) within the period for service of your defence if you have been served with a writ; *or*
 - (b) the period for filing of your affidavit evidence if you have been served with an originating summons; *or*
 - (c) within 14 days after service of the originating process in any other case.
2. If you have made an admission, you may only be allowed to amend or withdraw your admission if the Court considers it just to do so.
3. If you do not ask for time to pay, the plaintiff will decide how much and when you should pay.
4. If you ask for time to pay, the plaintiff will decide whether or not to accept your proposal for payment.
5. If the plaintiff accepts your proposal for payment, the plaintiff may, within 14 days after the copy of your admission is served on him, request the Court to enter judgment against you.
6. If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
 - (a) the information set out in this form;
 - (b) the reasons why the plaintiff does not accept your proposal for payment; and
 - (c) all other relevant matters.
7. The completed form should be filed in the Registry of the High Court.

How to fill in this form

- Tick the correct boxes and give as much information as you can. **Then sign and date the form.** If necessary provide details on a separate sheet, add the action number and attach it to this form.
- If you do not ask for time to pay, you need not complete items 2 to 9 and 11 to 14.
- If you ask for time to pay, make your offer of payment in item 14.
- If you are not an individual, you need not complete items 1 to 9 but you should complete items 10 to 12 and ensure that you comply with the requirement specified in item 13 and provide sufficient details about the assets and liabilities of your firm, company or corporation to support any offer of payment made in item 14.
- If you are an individual, you need not complete items 10 to 12 and need not comply with the requirement specified in item 13.
- You can get help to complete this form at the Registry of the High Court.

How much of the claim do you admit?

- ☐ I admit the full amount claimed as shown on the statement of claim **or**
- ☐ I admit the amount of \$

1. Personal details

Surname

Forename

☐ Mr

☐ Mrs

☐ Miss

☐ Ms

Address

2. Dependants (*people you look after financially*)

(*give details*)

--

3. Employment

☐ **I am employed as a**

My employer is

Jobs other than main job
(*give details*)

☐ **I am self employed as a**

Annual turnover is

\$

☐ **I am not** in arrears with my mandatory provident fund contributions and income tax

☐ **I am** in arrears and I owe

\$

Give details of :

(a) contracts and other work
in hand

(b) any sums due for work done

☐ **I have been unemployed for**

years

months

☐ **I am a pensioner**

4. Bank account and savings (*please list all*)

Bank account	In credit by \$	Overdrawn by \$


5. Residence

- I live in ☐ my own flat
☐ my jointly owned flat
☐ public housing estate
☐ rented private flat
☐ others (please specify)

6. Income

My usual take-home pay (including overtime, commission, bonuses, etc.)	\$	per month
My pension(s)	\$	per month
Others living in my home give me	\$	per month
Other income <i>(give details below)</i>		
	\$	per month
	\$	per month
	\$	per month
Total income	\$	per month

7. Other assets *(please list and indicate their location)*



8. Expenses

(Do not include any payments made by other members of the household out of their own income)

I have regular expenses as follows:	
Mortgage (<i>including second mortgage</i>)	\$ per month
Rent	\$ per month
Rates and government rent	\$ per month
Management fees	\$ per month
Domestic helper's salary	\$ per month
Gas	\$ per month
Electricity	\$ per month

Water charges	\$	per month
Telephone charges	\$	per month
Housekeeping, food, school meals	\$	per month
Travelling expenses	\$	per month
Children's clothing	\$	per month
Tuition fees	\$	per month
Maintenance payments	\$	per month
Court orders	\$	per month
Others		
	\$	per month
	\$	per month
	\$	per month
Total expenses	\$	per month

9. Liabilities

(This section is for arrears only. Do not include regular expenses listed in item 8.)

Rent arrears	\$
Mortgage arrears	\$
Rates and government rent arrears	\$
Water charges arrears	\$
Fuel debts: Gas	\$
Electricity	\$
Others	\$
Maintenance arrears	\$
Loans and credit card debts (please list)	\$
Others (give details below)	
	\$
	\$
Total liabilities	\$

10. Firm, company or corporation

Name

Address

Tel. no.

11. Assets of firm, company or corporation (please list)

Property, plant and equipment		\$
Inventories		\$
Goodwill and other intangible assets		\$
Loans and receivables		\$
Bank balances and cash		\$
Others		\$
Total		\$

12. Liabilities of firm, company or corporation (please list)

Trade payables		\$
Tax payables		\$
Other payables		\$
Bank loans		\$
Other borrowings		\$
Others		\$
Total		\$

13. Attach to this form a copy of the latest audited profit and loss account and balance sheet of the firm, company or corporation

14. Offer of payment

<input type="checkbox"/> I can pay the amount admitted on	<div style="border: 1px solid black; height: 25px; width: 100%;"></div>
or	
<input type="checkbox"/> I can pay by [weekly/monthly etc.] installments of	<div style="border: 1px solid black; padding: 2px;">\$ <div style="border: 1px solid black; display: inline-block; width: 150px; height: 25px; vertical-align: middle;"></div></div>
Starting (date)	
If you cannot pay immediately, please give brief reasons below :	

15. Declaration I _____ declare that the details I have given above and in the attached sheet(s) (if any) are true to the best of my knowledge
And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declaration Ordinance (Cap. 11)

Signed

Position or office held
(If signing on behalf of a firm, company or corporation)

With company chop
(if applicable)

Declared at _____ in Hong Kong on _____ of 20 ____.

Before me

[Signature and designation, i.e., Justice of the Peace/Notary Public/Commissioner for Oaths.]

- Note** — Under section 36 of the Crimes Ordinance (Cap. 200), a person who knowingly and wilfully makes a statement false in a material particular in a declaration or other document which he is authorized or required to make by an enactment is guilty of an offence.
- A defendant who is an individual must sign personally. A director of a company must obtain leave to represent the company from a Practice Master before he may sign on behalf of the company.
 - If a plaintiff does not file a request for judgment within 14 days after this form is served on him, his claim is stayed until he files the request.

No. 16C
Admission (unliquidated amount)
(O. 13A rr. 6(2), 7(2) & 13(2))

HCA 625 / 2025

**IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 625 OF 2025**

Between

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
~~CRYPTOCURRENCY ORIGINATING~~
~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
~~THE INDORSEMENT OF CLAIM~~
~~UP TO 26 MARCH 2025~~

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

Explanatory Note

1. The only claim the plaintiff has made against you is for an unliquidated amount of money. You may admit the plaintiff's claim in whole or in part by completing this form –
 - (a) within the period for service of your defence if you have been served with a writ; *or*
 - (b) the period for filing of your affidavit evidence if you have been served with an originating summons; *or*
 - (c) within 14 days after service of the originating process in any other case.
2. If you have made an admission, you may only be allowed to amend or withdraw your admission if the Court considers it just to do so.
3. You may offer a specified amount to satisfy the claim. If the amount you offer is accepted by the plaintiff, the plaintiff may request the Court to enter judgment against you for that amount. Alternatively, the plaintiff may request the court to enter judgment against you for an amount to be decided by the Court and costs.
4. You may also ask for time to pay. If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
 - (a) the information set out in this form;
 - (b) the reasons why the plaintiff does not accept your proposal for payment; and
 - (c) all other relevant matters.
5. The completed form should be filed in the Registry of the High Court.

How to fill in this form

- Tick the correct boxes and give as much information as you can. **Then sign and date the form.** If necessary provide details on a separate sheet, add the action number and attach it to this form.
- If you do not ask for time to pay, you need not complete items 2 to 9 and 11 and 12.
- If you are not an individual, you need not complete items 1 to 9 but you should complete items 10 to 12 and ensure that you comply with the requirement specified in item 13 and provide sufficient details about the assets and liabilities of your firm, company or corporation to support any offer of payment made.
- If you are an individual, you need not complete items 10 to 12 and need not comply with the requirement specified in item 13.
- You can get help to complete this form at the Registry of the High Court.

Part A Response to claim *(tick one box only)*

- ☐ I admit liability for the whole claim but want the Court to decide the amount I should pay (if you tick this box, you need not complete Part B and items 2 to 9, 11 and 12 and need not comply with the requirement specified in item 13)

OR

- ☐ I admit liability for the claim and offer to pay in satisfaction of the claim

Part B How are you going to pay the amount you have admitted? *(tick one box only)*

- ☐ I offer to pay on (date)

OR

☐ I cannot pay the amount immediately because (*state reason*)

AND

I offer to pay by instalments of

\$

per(week)(month)
starting (date)

1. Personal details

Surname

Forename

☐ Mr ☐ Mrs ☐ Miss ☐ Ms

Address

2. Dependants (*people you look after financially*)

(give details)

3. Employment

☐ I am employed as a

My employer is

Jobs other than main job
(give details)

☐ I am self employed as a

Annual turnover is

\$

☐ I am not in arrears with my mandatory provident fund contributions and income tax

☐ I am in arrears and I owe

Give details of :

(a) contracts and other work in
hand

(b) any sums due for work done

☐ I have been unemployed for

☐ I am a pensioner

\$
years months

4. Bank account and savings (please list all)

Bank account	In credit by \$	Overdrawn by \$

5. Residence

- I live in ☐ my own flat
☐ my jointly owned flat
☐ public housing estate
☐ rented private flat
☐ others (please specify)

6. Income

My usual take-home pay (including overtime, commission, bonuses etc)	\$	per month
My pension(s)	\$	per month
Others living in my home give me	\$	per month
Other income (<i>give details below</i>)		
	\$	per month
	\$	per month
	\$	per month
Total income	\$	per month

7. Other assets (*please list and indicate their location*)

8. Expenses

(Do not include any payments made by other members of the household out of their own income)

I have regular expenses as follows:

Mortgage <i>(including second mortgage)</i>	\$	per month
Rent	\$	per month
Rates and government rent	\$	per month
Management fees	\$	per month
Domestic helper's salary	\$	per month
Gas	\$	per month
Electricity	\$	per month
Water charges	\$	per month
Telephone charges	\$	per month
Housekeeping, food, school meals	\$	per month
Travelling expenses	\$	per month
Children's clothing	\$	per month
Tuition fees	\$	per month
Maintenance payments	\$	per month
Court orders	\$	per month
Others		
	\$	per month
Total expenses	\$	per month

9. Liabilities

(This section is for arrears only. Do not include regular expenses listed in item 8.)

Rent arrears	\$
Mortgage arrears	\$
Rates and government rent arrears	\$
Water charges arrears	\$
Fuel debts : Gas	\$
Electricity	\$
Others	\$
Maintenance arrears	\$
Loans and credit card debts <i>(please list)</i>	\$
	\$
	\$
Others <i>(give details below)</i>	\$
	\$
	\$
Total liabilities	\$

10. Firm, company or corporation

Name	
Address	
Tel. no.	

11. Assets of firm, company or corporation (please list)

Property, plant and equipment		\$
Inventories		\$
Goodwill and other intangible assets		\$
Loans and receivables		\$
Bank balances and cash		\$
Others		\$
Total		\$

12. Liabilities of firm, company or corporation (please list)

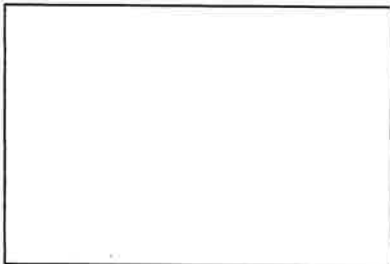
Trade payables		\$
Tax payables		\$
Other payables		\$
Bank loans		\$
Other borrowings		\$
Others		\$
Total		\$

13. Attach to this form a copy of the latest audited profit and loss account and balance sheet of the firm, company or corporation.

14. Declaration I _____ declare that the details I have given above and in the attached sheet(s) (if any) are true to the best of my knowledge

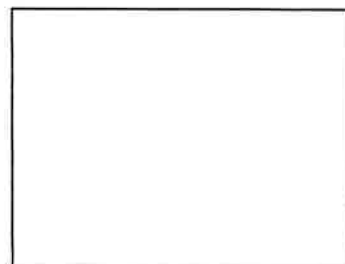
And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declaration Ordinance (Cap. 11)

Signed



Position or office held
(If signing on behalf of
a firm, company or
corporation)

With company chop
(if applicable)



Declared at _____ in Hong Kong on _____ of 20 ____.

Before me

[Signature and designation, i.e.,
Justice of the Peace/Notary
Public/Commissioner for Oaths.]

Note – Under section 36 of the Crimes Ordinance (Cap. 200), a person who knowingly and wilfully makes a statement false in a material particular in a declaration or other document which he is authorized or required to make by an enactment is guilty of an offence.

- A defendant who is an individual must sign personally. A director of a company must obtain leave to represent the company from a Practice Master before he may sign on behalf of the company.
- If a plaintiff does not file a request for judgment within 14 days after this form is served on him, his claim is stayed until he files the request.

申索性質:
A. * 金錢申索/非金錢申索/混合申索
B. 信託

表格 1
再經修訂的 傳訊令狀
(第 6 號命令第 1 條規則)

HCA 625 / 2025

香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
~~CRYPTOCURRENCY ORIGINATING~~
~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
~~THE INDORSEMENT OF CLAIM~~
~~UP TO 26 MARCH 2025~~

第一被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE OPERATOR

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

致第一被告人 PERSON(S) UNKNOWN CATEGORY B WHO RECEIVED CRYPTOCURRENCY ORIGINATING FROM THE BITCOIN ADDRESSES DEFINED AT PARAGRAPH 4 OF THE INDORSEMENT OF CLAIM UP TO 26 MARCH 2025 of unknown address

致第二被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES WHO ARE IDENTIFIED IN THE BINANCE.COM PLATFORM'S TERMS AND CONDITIONS AS BINANCE OPERATOR of unknown address

致第三被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE COINBASE.COM of unknown address

致第四被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE OKX.COM of unknown address

致第五被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE GEMINI.COM of unknown address

致第六被告人 BITCOINFORME S.L. TRADING AS BIT2ME of Calle Germán Bernacer, 69, 03203, Elche, Alicante, Spain of unknown address

致第七被告人 PERSON(S) UNKNOWN CATEGORY A of unknown address

本再經修訂的傳訊令狀已由上述原告人就背頁所列出的申索而針對你發出。

在本再經修訂的令狀送達你後(14 天)內(送達之日計算在內)，你必須了結該申索或將隨附的再經修訂的送達認收書交回高等法院登記處，並在再經修訂的認收書中述明你是否擬就本法律程序提出爭議或作出承認。

如你沒有在上述時限內了結該申索或交回送達再經修訂的認收書，或如你交回送達再經修訂的認收書但沒有在再經修訂的認收書中述明擬就本法律程序提出爭議或作出承認，則原告人可繼續進行訴訟，而判你敗訴的判決可隨即在無進一步通知發出的情況下予以登錄。

*[你如擬作出承認，可按照隨附的關於送達再經修訂的認收書的指示，填寫適當的附上的表格。]

本令狀於今天，即 2025 年 3 月 28 日由高等法院登記處發出。

司法常務官

備註：一本令狀除非經由法庭命令予以續期，否則不得在發出日期起計 12 個公曆月之後送達。

重要事項

關於送達再經修訂的認收書的指示載於隨附的表格。

再經修訂的傳訊令狀送達認收書

(第 12 號命令第 3 條規則)

關於送達再經修訂的認收書的指示

1. 隨附的送達再經修訂的認收書表格應由代表被告人行事的律師撕下及填寫，或如被告人是親自行事，則應由被告人撕下及填寫。表格填妥後必須交付或以郵遞方式送交高等法院登記處，登記處的地址是：—

香港金鐘道 38 號高等法院低層 1 樓

2. 被告人如在其送達再經修訂的認收書中表示擬就法律程序提出爭議，則必須亦將一份抗辯書送交高等法院登記處存檔，該份抗辯書必須以中文或英文寫成，其文本並必須送達原告人的代表律師(或如原告人是親自行事，則送達原告人)。

如再經修訂的令狀註有再經修訂的申索陳述書(即在背頁上端出現“再經修訂的申索陳述書”等字)，則除非在對再經修訂的令狀作認收送達的時限後 28 天內有要求作判決的傳票送達被告人，否則必須在該段時限內將抗辯書送交存檔及送達。

再經修訂的令狀並無註有再經修訂的申索陳述書，則必須在再經修訂的申索陳述書送達被告人後 28 天內將抗辯書送交存檔及送達。

如被告人沒有在適當時限內將其抗辯書送交存檔及送達，則原告人可不發出進一步通知而登錄判被告人敗訴的判決。

被告人的抗辯書必須按照《高等法院規則》(第 4 章，附屬法例 A) 第 41A 號命令，以屬實申述核實。

3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，你可藉填寫隨附於再經修訂的傳訊令狀的表格 16 或 16C (視乎情況所需)，承認原告人的整項申索或其部分。

填妥的表格 16 或 16C 必須在送達抗辯書的限期內，送交高等法院登記處存檔，並送達原告人[或原告人的律師]。

4. 被告人如意欲對原訟法庭在法律程序中的司法管轄權提出爭議，或意欲辯稱原訟法庭不應在有關法律程序中行使其司法管轄權，並意欲向原訟法庭提出申請，要求作出擱置法律程序的命令，必須就法律程序發出擬抗辯通知書，並必須在送達抗辯書的時限內提出申請。

見隨附的填寫指引

填寫指引

1. 每一名被告人(如被告人多於一名)均須填寫一份再經修訂的送達認收書，並將之交回高等法院登記處。

[2. 為計算作認收送達的 14 天期限，面交送達被告人的再經修訂的令狀視作已在其交付被告人之日送達，而以郵遞或投入被告人信箱的方式送達的令狀，則視作已在投寄或投入被告人信箱之日後第七天送達。]

(備註：如被告人是一間公司而再經修訂的令狀是在該公司的註冊辦事處送達，則此條並不適用。)

3. 凡被告人是以有別於其本身姓名或名稱的姓名或名稱被起訴，表格必須由他填寫，並須在第 1 段中加上“以(再經修訂的傳訊令狀所述明的姓名或名稱)之名被起訴”等字。

4. 凡被告人是一間商號，且並沒有指示律師代為行事，表格必須由一名合夥人以其姓名或名稱填寫，並須在第 1 段中在其姓名或名稱之後加上“(.....)商號的合夥人”的描述。

5. 凡被告人是以個人身分以其本身姓名以外的名稱營業而被起訴，表格必須由他填寫，並須在第 1 段中在其姓名之後加上“以(.....)之名營業”的描述。

6. 凡被告人是一間有限公司，表格必須由律師或獲授權代該公司行事的人填寫，但該公司如無律師代表行事，則不得在法律程序中採取進一步的步驟。

7. 凡被告人是未成年人或精神病人，表格必須由辯護監護人的代表律師填寫。

8. 親自行事的被告人可在高等法院登記處獲取協助填寫表格。

9. 本填寫指引只適用於比較普通的案件，親自行事的被告人如有困難應參閱上文第 8 段。

香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

PERSON(S) UNKNOWN CATEGORY B
WHO RECEIVED
CRYPTOCURRENCY ORIGINATING
FROM THE BITCOIN ADDRESSES
DEFINED AT PARAGRAPH 4 OF
THE INDORSEMENT OF CLAIM
UP TO 26 MARCH 2025

第一被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE OPERATOR

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

再經修訂的傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引1、3、4及5。 1. 述明對再經修訂的令狀作認收送達或由他人代為對再經修訂的令狀作認收送達的被告人的全名。

2. 述明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“✓”號)

☐ 是

☐ 否

見指示3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，述明被告人是否擬作出承認。
(在適用的方格內加上“✓”號)。

☐ 是

☐ 否

如擬作出承認，被告人可藉填寫隨附於再經修訂的傳訊令狀的表格16或16C(視乎情況所需)而作出承認。

方括號內字句
如不適用請予
刪去。

本人據此對再經修訂的令狀作認收送達。

(簽署) [律師] ()

[無律師代表的被告人]

送達地址

關於送達地址的備註

律師：凡被告人是由律師代表，述明該律師在香港的營業地點。

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原告人代表律師
香港中環德輔道中 54-58 號
11 樓 1101 室
電話：2815 5116
傳真：2815 5269
檔案編號：Y2251839

香港特別行政區
高等法院
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第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

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表格 16
承認(經算定款額)
(第 13A 號命令第 4(2)、5(2)及 13(2)條規則)

HCA 625 / 2025

香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

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第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

註釋

1. 原告人針對你而提出的唯一申索，是經算定款項。你可在下述限期內，藉填寫本表格而承認原告人的整項申索或其部分 —
 - (a) (如你已獲送達令狀) 送達抗辯書的限期；或
 - (b) (如你已獲送達原訴傳票) 將你的誓章證據送交存檔的限期；或
 - (c) (在任何其他情況下) 送達原訴法律程序文件後 14 天。
2. 如你已作出承認，你僅會在法庭認為容許你修訂或撤回你的承認屬公正的情況下，獲容許修訂或撤回你的承認。
3. 如你不要求給予時間以作付款，原告人會決定你應支付的款額，以及你應在何時付款。
4. 如你要求給予時間以作付款，原告人會決定是否接受你的付款建議。
5. 如原告人接受你的付款建議，原告人可在你的承認的文本送達他後 14 天內，請求法庭登錄判你敗訴的判決。
6. 如原告人不接受你的付款建議，法庭在考慮下述事宜後，會決定應如何作出付款 —
 - (a) 本表格列出的資料；
 - (b) 原告人不接受你的付款建議的原因；及
 - (c) 所有其他有關事宜。
7. 已填妥的表格應送交高等法院登記處存檔。

如何填寫本表格

- 在正確的方格內加上“✓”號，並盡可能提供最詳盡的資料。然後在表格上簽署和註明日期。如有需要，可另紙提供詳細資料，加上有關訴訟編號，並將其夾附於本表格。
- 如你不要求給予時間以作付款，則不必填寫第 2 至 9 項以及第 11 至 14 項。
- 如你要求給予時間以作付款，可在第 14 項中作出你的付款提議
- 如你並非個人，則不必填寫第 1 至 9 項，但你應填寫第 10 至 12 項，並確保你遵守第 13 項指明的規定，以及就你的商號、公司或法團的資產及負債提供足夠的詳細資料，以支持在第 14 項中作出的任何付款提議。
- 如你是個人，則不必填寫第 10 至 12 項，亦不必遵守第 13 項指明的規定。
- 你可在高等法院登記處，得到關於填寫本表格的協助

你承認多少的申索款額？

☐ 本人承認申索陳述書所顯示全部申索款額或

☐ 本人承認的款額為 \$

1. 個人詳細資料

姓

名

☐ 先生 ☐ 夫人 ☐ 小姐 ☐ 女士

地址

2. 受養人 (接受你財政照顧的人)

(提供詳細資料)

3. 受僱情況

☐ 本人受僱為

本人的僱主為

主要工作以外的工作
(提供詳細資料)

☐ 本人自僱從事

每年營業額為

\$

☐ 本人並無拖欠本人的強制性公積金供款及入息稅

☐ 本人有拖欠款項，
所欠款額為

\$

提供以下項目的詳細
資料：

(a) 手上的合約及其他
工作

(b) 已進行工作的任何
未付款項

☐ 本人已失業，為期

年

個月

☐ 本人為領取退休金的人

4. 銀行帳戶及儲蓄 (請全數列出)

銀行帳戶	貸項款額 \$	透支款額 \$

5. 居所

- 本人居於
- ☐ 自置居住單位
 - ☐ 本人的聯名擁有居住單位
 - ☐ 公共屋邨
 - ☐ 租住私人單位
 - ☐ 其他 (請指明)

6. 入息

本人通常的實得收入(包括超時收入、佣金、花紅等)	每月\$
本人的退休金	每月\$
居於本人家中的其他人給本人的款項	每月\$
其他入息(在下面提供詳細資料)	
	每月\$
	每月\$
	每月\$
總入息	每月\$

7. 其他資產 (請列出和示明其所在)

--

8. 開支

(請勿包括住戶中其他成員自其本身入息作出的任何付款)

本人有以下定期開支：	
按揭 (包括第二按揭)	每月\$
租金	每月\$
差餉及地租	每月\$
管理費	每月\$
家庭傭工薪金	每月\$
石油氣／煤氣費	每月\$
電費	每月\$
水費	每月\$
電話費	每月\$
家務開支、食物、學校膳食	每月\$
交通費	每月\$
子女衣服	每月\$
學費及補習費	每月\$
贍養費	每月\$
法庭命令	每月\$
其他	
	每月\$
總開支	每月\$

9. 負債

(本項僅供填寫欠款。請勿包括第 8 項中列出的定期開支。)

租金欠款	\$
按揭欠款	\$
差餉及地租欠款	\$
水費欠款	\$
燃料債項：石油氣／煤氣費	\$
電費	\$
其他	\$
贍養費欠款	\$
貸款及信用卡債項 (請列出)	\$
	\$
其他 (在下面提供詳細資料)	
	\$
	\$
總負債	\$

10. 商號、公司或法團

名稱

地址

電話號碼

11. 商號、公司或法團資產(請列出)

財產、裝置及設備		\$
備庫存資產		\$
商譽及其他無形資產		\$
貸款及應收款項		\$
銀行結餘及現金		\$
其他		\$
總額		\$

12. 商號、公司或法團負債(請列出)

營業應繳款項		\$
應繳稅項		\$
其他應繳款項		\$
銀行貸款		\$
其他借款		\$
其他		\$
總額		\$

13. 將商號、公司或法團最近期的經審計的損益表及資產負債表副本夾附於本表格

14. 付款提議

☐ 本人能夠在以下日期支付已承認的款額

或

☐ 本人能夠分期每[週/月等]支付

\$

由 (日期)開始
如你不能即時付款，請在下面簡述理由：

15. 聲明 本人_____聲明：盡本人所知，本人在以上各段及在附頁(如有的話)中提供的詳細資料，均屬事實

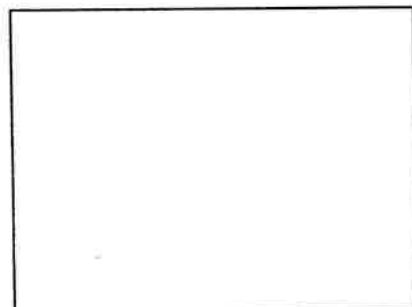
本人謹憑藉《宣誓及聲明條例》(第 11 章)衷誠作出此項鄭重聲明，並確信其為真確無訛

簽署



職銜或所擔任的職位
(如代表商號、公司或法團簽署)

連同公司圖章
(如適用的話)



此項聲明是於 20____年____月____日在香港_____作出。

在本人面前作出

[簽署及職銜，即：太平紳士/公證人/監誓員。]

附註 一 根據《刑事罪行條例》(第 200 章)第 36 條，任何人明知而故意在任何成文法則授權他或規定他作出的聲明或其他文件中，作出在要項上屬虛假的陳述，即屬犯罪。

一 屬個人的被告人必須由個人親身簽署。公司的董事必須事先取得常規聆案官的許可，方可代公司簽署。

一 如原告人沒有在本表格送達他後 14 天內，將要求判決的請求送交存檔，其中索須予擱置，直至他將該請求送交存檔為止。

表格 16C
承認(未經算定款額)
(第 13A 號命令第 6(2)、7(2)及 13(2)條規則)

HCA 625 / 2025

香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
~~CRYPTOCURRENCY ORIGINATING~~
~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
~~THE INDORSEMENT OF CLAIM~~
~~UP TO 26 MARCH 2025~~

第一被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE OPERATOR

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

註釋

1. 原告人針對你而提出的唯一申索，是未經算定款項。你可在下述限期內，藉填寫本表格而承認原告人的整項申索或其部分 —
 - (a) (如你已獲送達令狀) 送達抗辯書的限期；或
 - (b) (如你已獲送達原訴傳票) 將你的誓章證據送交存檔的期限；或
 - (c) (在任何其他情況下) 送達原訴法律程序文件後 14 天。
2. 如你已作出承認，你僅會在法庭認為容許你修訂或撤回你的承認屬公正的情況下，獲容許修訂或撤回你的承認。
3. 你可提議一個指明的款額以了結申索。如你提議的款額獲原告人接受，則原告人可請求法庭登錄判你須支付該款額的判決。另一做法是原告人可請求法庭登錄判你須支付有待法庭決定的款額以及訟費的判決。
4. 你亦可要求給予時間以作付款。如原告人不接受你的付款建議，法庭在考慮下述事宜後，會決定應如何作出付款 —
 - (a) 本表格列出的資料；
 - (b) 原告人不接受你的付款建議的原因；及
 - (c) 所有其他有關事宜。
5. 已填妥的表格應送交高等法院登記處存檔。

如何填寫本表格

- 在正確的方格內加上“✓”號，並盡可能提供最詳盡的資料。然後在表格上簽署和註明日期。如有需要，可另紙提供詳細資料，加上有關訴訟編號，並將其夾附於本表格。
- 如你不要求給予時間以作付款，則不必填寫第 2 至 9 項以及第 11 及 12 項。
- 如你並非個人，則不必填寫第 1 至 9 項，但你應填寫第 10 至 12 項，並確保你遵守第 13 項指明的規定，以及就你的商號、公司或法團的資產及負債提供足夠的詳細資料，以支持所作出的任何付款提議。
- 如你是個人，則不必填寫第 10 至 12 項，亦不必遵守第 13 項指明的規定。
- 你可在高等法院登記處，得到關於填寫本表格的協助。

A 部對申索的回應(僅在一個方格內加上“✓”號)

- ☐ 本人承認整項申索的法律責任，但希望法庭決定本人應支付的款額(如你在本方格內加上“✓”號，則不必填寫 B 部及第 2 至 9 項、第 11 及 12 項，亦不必遵守第 13 項指明的規定)

或

- ☐ 本人承認申索的法律責任，並提議支付 以了結申索

B 部 你將如何支付已承認的款額?(僅在一個方格內加上“✓”號)

- ☐ 本人提議在(日期) 付款

或

- ☐ 本人不能即時付款，理由是(述明理由)

及

本人提議分期付款，
每(星期)(月)支付 \$ 並由 (日期) 開始付款

1. 個人詳細資料

姓

名

☐ 先生 ☐ 夫人 ☐ 小姐 ☐ 女士

地址

2. 受養人(接受你財政照顧的人)

(提供詳細資料)

3. 受僱情況

☐ 本人受僱為

本人的僱主為

主要工作以外的工作
(提供詳細資料)

☐ 本人自僱從事

每年營業額為

\$

☐ 本人並無拖欠本人的強制性公積金供款及入息稅

☐ 本人有拖欠款項，
所欠款額為

\$

提供以下項目的詳細
資料:

(a) 手上的合約及
其他工作

(b) 已進行工作的任何
未付款項

☐ 本人已失業，為期

年

個月

☐ 本人為領取退休金的人

4. 銀行帳戶及儲蓄 (請全數列出)

銀行帳戶	貸項款額 \$	透支款額 \$

5. 居所

- 本人居於 ☐ 自置居住單位
☐ 本人的聯名擁有居住單位
☐ 公共屋邨
☐ 租住私人單位
☐ 其他(請指明)

6. 入息

本人通常的實得收入(包括超時收入、佣金、花紅等)	每月 \$
本人的退休金	每月 \$
居於本人家中的其他人給本人的款項	每月 \$
其他入息(在下面提供詳細資料)	
	每月 \$
	每月 \$
	每月 \$
總入息	每月 \$

7. 其他資產 (請列出和示明其所在)

--

8. 開支

(請勿包括住戶中其他成員自其本身入息作出的任何付款)

本人有以下定期開支:	
按揭 (包括第二按揭)	每月 \$
租金	每月 \$
差餉及地租	每月 \$
管理費	每月 \$
家庭傭工薪金	每月 \$
石油氣／煤氣費	每月 \$
電費	每月 \$
水費	每月 \$
電話費	每月 \$
家務開支、食物、學校膳食	每月 \$
交通費	每月 \$
子女衣服	每月 \$
學費及補習費	每月 \$
贍養費	每月 \$
法院命令	每月 \$
其他	每月 \$
總開支	每月 \$

9. 負債

(本項僅供填寫欠款。請勿包括第 8 項中列出的定期開支。)

租金欠款	\$
按揭欠款	\$
差餉及地租欠款	\$
水費欠款	\$
燃料債項：石油氣／煤氣費	\$
電費	\$
其他	\$
贍養費欠款	\$
貸款及信用卡債項(請列出)	\$
其他(在下面提供詳細資料)	
	\$
總負債	\$

10. 商號、公司或法團

名稱

地址

電話號碼

11. 商號、公司或法團資產 (請列出)

財產、裝置及設備		\$
庫存資產		\$
商譽及其他無形資產		\$
貸款及應收款項		\$
銀行結餘及現金		\$
其他		\$
總額		\$

12. 商號、公司或法團負債 (請列出)

營業應繳款項		\$
應繳稅項		\$
其他應繳款項		\$
銀行貸款		\$
其他借款		\$
其他		\$
總額		\$

13. 將商號、公司或法團最近期的經審計的損益表及資產負債表副本夾附於本表格

14. 聲明 本人_____聲明：盡本人所知，本人在以上各段及在附頁(如有的話)中提供的詳細資料，均屬事實

本人謹憑藉《宣誓及聲明條例》(第 11 章)衷誠作出此項鄭重聲明，並確信其為真確無訛

簽署



職銜或所擔任的
職位
(如代表商號、
公司或法團簽署)
連同公司圖章
(如適用的話)



此項聲明是於 20____年____月____日在香港_____作出。

在本人面前作出

[簽署及職銜，即：太平紳士/公證人/監誓員。]

附註一 根據《刑事罪行條例》(第 200 章)第 36 條，任何人明知而故意在任何成文法則授權他或規定他作出的聲明或其他文件中，作出在要項上屬虛假的陳述，即屬犯罪。

- 屬個人的被告人必須由個人親身簽署。公司的董事必須事先取得常規聆案官的許可，方可代公司簽署。
- 如原告人沒有在本表格送達他後 14 天內，將要求判決的請求送交存檔，其申索須予擱置，直至他將該請求送交存檔為止。

(注意：請以英文本為準)

* 方括號內字句如不適用請予刪去。

* (如註有申索陳述書，請簽署。)

再經修訂的申索陳述書必須按照《高等法院規則》(第4章，附屬法例A)第41A號命令，以屬實申述核實。

(凡原告人只就一筆債項或經算定的索求款項提出申索：如在交回送達再經修訂的認收書的時限內，被告人支付所申索的款額以及\$_____作為訟費，則進一步的法律程序會被擱置。該筆款項必須付給原告人或其律師。)

本再經修訂的令狀是由代表上述原告人的殷國榮律師行發出，其地址為香港中環德輔道中54-58號11樓1101室，而該原告人的地址則為Flat A, 8th Floor, Block 3, Imperial Cullinan, 10 Hoi Fai Road, Tai Kok Tsui, Kowloon, Hong Kong。

*(或凡原告人是親自起訴者。)

本再經修訂的令狀是由上述原告人發出，該原告人居於_____及(如原告人並非居於本司法管轄權範圍內)其送達地址為_____)。

(以下部分及首頁的申索性質部分並非表格1的部分)

有關屬實申述的格式，請參閱《高等法院規則》(第4章，附屬法例A)第41號命令第5(1)條規則的規定。舉例如下：

“本人/原告人相信本申索陳述書所述事實屬實。”

香港特別行政區
高等法院
原訟法庭

高院民事訴訟 2025 年第 625 號

BETWEEN

YAN YU YING (忻汝英)

原告人

及

PERSON(S) UNKNOWN CATEGORY B
~~WHO RECEIVED~~
~~CRYPTOCURRENCY ORIGINATING~~
~~FROM THE BITCOIN ADDRESSES~~
~~DEFINED AT PARAGRAPH 4 OF~~
~~THE INDORSEMENT OF CLAIM~~
~~UP TO 26 MARCH 2025~~

第一被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE
OPERATOR

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
OMPANIES OR OTHER ENTITIES THAT OPERATE
COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

再經修訂的傳訊令

發出日期: 2025 年 3 月 28 日

送交存檔日期: 2025 年 3 月 28 日

送交存檔日期: 2025 年 7 月 31 日

送交存檔日期: 2025 年 8 月 日

原告人代表律師

殷國榮律師行

香港中環德輔道中 54-58 號 11 樓 1101 室

電話 : 2815 5116 傳真 : 2815 5269

檔案編號 : Y2251839

Where words appear between square brackets delete if inapplicable.

*(Signed if statement of claim indorsed.)

An Re-Amended statement of claim must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

(Where the Plaintiff's claim is for a debt or liquidated demand only: If, within the time for returning the Re-Amended Acknowledgment of Service, the Defendant pays the amount claimed and \$ _____ for costs, further proceedings will be stayed. The money must be paid to the Plaintiff or his Solicitor.)

THIS RE-AMENDED WRIT was issued by Messrs. Edwin Yun & Co., of Room 1101, 11th Floor, Nos.54-58 Des Voeux Road Central, Hong Kong, Solicitors for the said Plaintiff of Flat A, 8th Floor, Block 3, Imperial Cullinan, 10 Hoi Fai Road, Tai Kok Tsui, Kowloon, Hong Kong.

(Sd.) Edwin Yun & Co.
~~EDWIN YUN & CO.~~
~~Solicitors for the Plaintiff~~

(Sd.) Edwin Yun & Co.
~~EDWIN YUN & CO.~~
~~Solicitors for the Plaintiff~~

EDWIN YUN & CO.
Solicitors for the Plaintiff

*(or where the Plaintiff sues in person:

THIS RE-AMENDED WRIT was issued by the said Plaintiff who resides at _____

and (if the Plaintiff does not reside within the jurisdiction) whose address for service is _____

(This footnote and the claim nature box at the front page do not form part of the statutory Form No. 1)
Please refer to Order 41A rule 5 (1) of the Rules of the High Court, Cap.4A for the form of the statement of truth.
Example is given below:

*I / The plaintiff believe(s) that the facts stated in this statement of claim are true.”

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO.625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B
WHO RECEIVED
CRYPTOCURRENCY ORIGINATING
FROM THE BITCOIN ADDRESSES
DEFINED AT PARAGRAPH 4 OF
THE INDORSEMENT OF CLAIM
UP TO 26 MARCH 2025

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE
OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE
OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE
GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

RE-AMENDED WRIT OF SUMMONS

Issued on the 28th day of March 2025

~~Filed on the 28th day of March 2025~~

~~Filed on the 31st of July 2025~~

Filed on the of August 2025

Messrs. Edwin Yun & Co.,
Solicitors for the Plaintiff
Room 1101, 11th Floor,
Nos.54-58 Des Voeux Road Central, Hong Kong.
Tel : 2815 5116 Fax : 2815 5269
Ref : Y2251839

Amended as in red this 31st July 2025
pursuant to the Order made by The
Honourable Mr Justice Lok dated
30th July 2025.

Re-amended as in green this August
2025 pursuant to the Order made by The
Honourable Mr Justice Lok dated
August 2025.

Registrar

Registrar HCA 625/ 2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B

~~WHO RECEIVED~~

~~CRYPTOCURRENCY ORIGINATING~~

~~FROM THE BITCOIN ADDRESSES~~

~~DEFINED AT PARAGRAPH 4 OF~~

~~THE INDORSEMENT OF CLAIM~~

~~UP TO 26 MARCH 2025~~

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS

OR COMPANIES OR OTHER ENTITIES WHO ARE

IDENTIFIED IN THE BINANCE.COM PLATFORM'S

TERMS AND CONDITIONS AS BINANCE OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES

OR OTHER ENTITIES THAT OPERATE GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

DRAFT RE-AMENDED STATEMENT OF CLAIM

A. The parties

1. The Plaintiff is a victim of Bitcoin theft.
2. The 1st Defendant(s) is/are the persons unknown who own and operate the cryptocurrency address “1KGnHUhhqw7P7QPDcXyPdowSTg687Fe8N9” (“the D1 Address”) and received cryptocurrency originating from the following Bitcoin addresses ~~up to 26 March 2025:-~~
 - 2.1. around 300 in address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw
 - 2.2. around 38 in address 3BGJuYeHak3WhSjSrkJNz25XJnE23dFiQam

2.3. around 23 in address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu

(“361 Bitcoins”) (“Subject Addresses”)

3. The 2nd to 6th Defendants are entities operating various cryptocurrency exchanges identified by an investigator, Mr Umberto BUONORA of Recoveris.io in a report entitled “*Forensic Memo on Fraud Incident*” dated 24 March 2025 (“**Report**”),
 - 3.1. The 2nd Defendant is/are the entity/entities operating the “*Binance*” cryptocurrency exchange.
 - 3.2. The 3rd Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.coinbase.com/>.
 - 3.3. The 4th Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.okx.com/>.
 - 3.4. The 5th Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.gemini.com/>.
 - 3.5. The 6th Defendant is a company incorporated in Spain, identified on the website <https://bit2me.com/> as the operator of the cryptocurrency exchange at <https://bit2me.com/>.
- 3A. The 7th Defendant(s) is/are the person(s) unknown who own or operate the cryptocurrency addresses “0x16e4c3721d65701542ff5ae4c959fceb1d9fe2b”, “0xbf91ca583ec6b3b37560b3781f2810965184ddd6”, and “0x5a709e0f5f508fbb56c333589d5dda835b1a61c1”, which are associated with the 2nd Defendant (“**the D7 Addresses**”).

B. The theft of the Plaintiff's Bitcoins

4. The Plaintiff is the plaintiff in High Court Action Number 2295 of 2019, where her case is that Mr LEUNG Wing Hei (“**Mr Leung**”) (the defendant in that case) has stolen around 1,000 Bitcoins from her in 2018 (“**1,000 Bitcoins**”).
5. In 2022, the Hong Kong Court of First Instance ordered Mr Leung not to dispose of around 364.46378963 Bitcoins that he still held from the 1,000 Bitcoins (“**HCA 2295 of 2019 Injunction**”).
6. Prior to 12 March 2025, of the around 364.46378963 Bitcoins, around 361 Bitcoins were held in the Subject Addresses.
7. On 12 March 2025, the around 361 Bitcoins were transferred to and therefore stolen by the 1st Defendant.
8. The 1st and 7th Defendants knew or ought to have known that the 361 Bitcoins and their traceable proceeds belonged to the Plaintiff at all material times.

Particulars of the 1st and 7th Defendant's' Knowledge

- 8.1. The 361 Bitcoins were subject to HCA 2295 of 2019 Injunction.
- 8.2. The Plaintiff did not authorise these transfers.
- 8.3. There was no commercial or other logic behind the rapid transfers of the 361 Bitcoins as disclosed by the “*complex and vast layering scheme*” involving around 365 identifiable transfers within around 8 days.

8.4 Most of the 361 Bitcoins were swapped for other cryptocurrency to conceal the unauthorised transfers and dissipation.

9. Mr Leung denies knowledge or responsibility for these transfers, and the identity of the 1st Defendant remains unknown.

10. After the discovery of the 1st Defendant's theft, the Plaintiff instructed investigators to investigate the recipients of the 361 Bitcoins.

11. On 24 March 2025, the Plaintiff received the Report which shows that:-

11.1. a "*complex and vast layering scheme*" had taken place involving around 365 identifiable transfers within around 8 days on an initial investigation.

11.2. parts of the 361 Bitcoins were transferred to deposit addresses and/or user accounts associated with the 2nd, 3rd, 4th, 5th and 6th Defendants, who are centralised cryptocurrency exchanges with Know Your Customer policies.

11A. On 23 July 2025, the Plaintiff received a report from Bitrace Limited which shows that:

11A.1 most of the 361 Bitcoins were swapped for Ethereum Tokens and were transferred on the Ethereum blockchain.

11A.2 around 54.5% of the 361 Bitcoins were transferred to the D7 Addresses.

12. It follows that the 2nd, 3rd, 4th, 5th and 6th Defendants hold information pertaining to the identity of the 1st Defendant by virtue of their Know Your Customer policies.

13. Investigations are ongoing, and the Plaintiff will apply to join additional parties if necessary. The Plaintiff also reserves her right to plead further particulars upon discovery and/or interrogatories.
14. Purely as a reference, the value of one Bitcoin as at the date of this Statement of Claim is approximately HK\$749,151, at which the 361 Bitcoins would be worth approximately HK\$270,443,511.
15. The Plaintiff suffered loss and seeks recovery of the 361 Bitcoins. Against the 1st and 7th Defendants, the Plaintiff will rely on fraud, conversion, misuse of private information, unjust enrichment, monies had and received, constructive trust, knowing receipt, dishonest assistance and equity to seek recovery of the 361 Bitcoins, ~~and~~ their traceable proceeds, damages and/or equitable compensation.
16. As against the 2nd to 6th Defendants, the Plaintiff seeks disclosure of information to enable the Plaintiff to identify and recover from the 1st and 7th Defendants.

AND THE PLAINTIFF CLAIMS AGAINST THE DEFENDANTS:

- (1) A declaration that
 - (a) the Plaintiff was at all material times and remains the beneficial owner of the 361 Bitcoins and/or their traceable proceeds; and
 - (b) The 1st Defendant holds the 361 Bitcoins and/or their traceable proceeds on trust for the Plaintiff.

AND THE PLAINTIFF CLAIMS AGAINST THE 1st AND 7TH DEFENDANTS:

- (2) An order that the 1st and 7th Defendants do deliver up the 361 Bitcoins and/or their traceable proceeds to the Plaintiff.

- (3) All necessary consequential or further accounts, inquiries or orders to enable the Plaintiff to trace and recover the 361 Bitcoins and/or their traceable proceeds.
- (4) Damages or equitable compensation to be assessed.
- (5) Interest on any sum ordered to be paid at such rate and for such period as this Honourable Court deems just pursuant to Sections 48 and 49 of the High Court Ordinance or pursuant to the Court's equitable jurisdiction.
- (6) Further and other relief.
- (7) Costs.

AND THE PLAINTIFF CLAIMS AGAINST THE 2ND TO 6TH DEFENDANTS:

- (8) An order that the 2nd to 6th Defendant disclose to the Plaintiff:
 - (a) The full name(s), address, particulars, email address(es), IP address(es) and a full set of Know Your Client documents of the client account(s) associated with the addresses and transactions identified in the Report defined above and exhibited to the First Affirmation of Chow Kam Pui ("**Client Account(s)**") and the D7 Addresses.
 - (b) The account balance as at the date of the Order, and the complete transaction log of the Client Account(s), including but not limited to the fiat and/or cryptocurrency deposits and withdrawals for the period starting from 12 March 2025 13:50 UTC.

- (c) Any bank accounts associated with the Client Accounts known to the Defendant, including the name and address of the relevant bank.

~~Dated 1 May 2025~~

~~JASPER WONG~~
~~Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.
~~EDWIN YUN & CO~~
~~Solicitors for the Plaintiff~~

~~Dated 30 July 2025~~

~~JUSTIN W.T. LAM~~
~~Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.
~~EDWIN YUN & CO~~
~~Solicitors for the Plaintiff~~

Dated August 2025

JUSTIN W.T. LAM
Counsel for the Plaintiff

EDWIN YUN & CO
Solicitors for the Plaintiff

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this Statement of Claims are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 12th day of May, 2025.~~

~~日期：2025 年 5 月 12 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this Amended Statement of Claim are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 30th day of July, 2025.~~

~~日期：2025 年 7 月 30 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

I, YAN YU YING, the Plaintiff, believes that the facts stated in this Re-Amended Statement of Claim are true.

本人，忻汝英，原告人，真誠相信上述所述的事實為真實。

Dated this day of August, 2025.

日期：2025 年 8 月 日

YAN YU YING

HCA 625/2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO.625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

Plaintiff

AND

PERSON(S) UNKNOWN CATEGORY B

~~WHO RECEIVED~~

~~CRYPTOCURRENCY ORIGINATING~~

~~FROM THE BITCOIN ADDRESSES~~

~~DEFINED AT PARAGRAPH 4 OF~~

~~THE INDORSEMENT OF CLAIM~~

~~UP TO 26 MARCH 2025~~

1st Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS
OR COMPANIES OR OTHER ENTITIES WHO ARE
IDENTIFIED IN THE BINANCE.COM PLATFORM'S
TERMS AND CONDITIONS AS BINANCE
OPERATOR

2nd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
COINBASE.COM

3rd Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
OKX.COM

4th Defendant

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

RE-AMENDED STATEMENT OF CLAIM

~~Filed on : 20th May, 2025~~

~~Filed on : 31st July, 2025~~

Filed on : August, 2025

Edwin Yun & Co.,
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