

Plaintiff: Qin Shengzhi: 2nd: 4.8.2025

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

2ND AFFIRMATION OF QIN SHENGZHI

I, QIN Shengzhi, of [REDACTED]

[REDACTED], do solemnly, sincerely and truly affirm and say as follows: -

1. I am a recent PhD graduate of the Department of Computer Science, the University of Hong Kong.
2. I am duly authorised by the Plaintiff to make this affirmation on her behalf.
3. I previously provided an affirmation of service in this action.
4. I am instructed by the Plaintiff's solicitors Messrs Edwin Yun & Co ("EYC") to carry out the substituted service order against the 7th Defendant in this action.
5. For the avoidance of doubt, I have a broad familiarity with information technology and cryptocurrency, and I believe I have the competence to carry out the service required of me.

6. Unless otherwise stated, the facts and matters deposed to in this Affirmation are true and are derived from my personal knowledge or my perusal of the relevant documents. Where there are facts and matters not within my own knowledge, they are derived from such sources of information specifically indicated below and true to the best of my information and belief.
7. My role in this case is simply to assist EYC to conduct substituted service as ordered by the Honourable Court. I do not know the Plaintiff personally and have no personal interest in the outcome of this action.
8. In full and frank disclosure, one of my PhD supervisors was Dr CHOW Kam Pui, who has previously provided four affirmations in this action.
9. I do not believe that the fact that I conducted research with him (and am joint author with him in some papers) has any influence on how I conduct the tasks required of me by EYC.

Substituted Service on the 7th Defendant

10. I am advised by EYC and believe that:
 - 10.1. On 30 July 2025, the Honourable Court granted an order against the 7th Defendant in the action.
 - 10.2. On the same day, the Honourable Court made an order for substituted service on the 7th Defendant, i.e. by NFT Airdrop to the 7th Defendant cryptocurrency addresses.
 - 10.3. The method of substituted service was stated in the Fourth Affirmation of CHOW Kam Pui at paragraphs 19 to 25.
11. I was instructed to conduct NFT Airdrop as per the orders and directions above.

The website

12. On 1 August 2025 at around 4:30 p.m., I updated the website <https://hca625of2025.com/> and uploaded the inter partes summons dated 1 August 2025, the court orders, and documents from the ex parte application to the website.
13. There is now produced and shown to mw marked Exhibit “QS-4” a printout of the website.

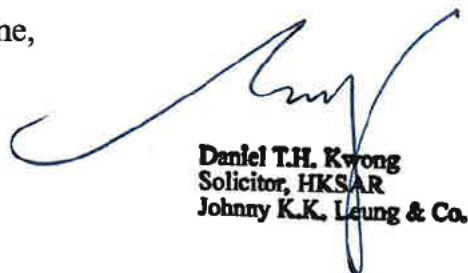
NFT Airdrop

14. I was also instructed to send a specific form of text (which was provided to me by EYC) to the 7th Defendant’s addresses by way of NFT Airdrop.
15. On 1 August 2025 at around 5:30 p.m., I started airdropping the NFTs to the 7th Defendant’s addresses.
16. There is now produced and shown to me marked Exhibit “QS-5” printouts of the airdrops viewed on Etherscan at www.etherscan.io.

AFFIRMED at Messrs. Johnny K.K.)
Leung & Co., Solicitors of 16th Floor,)
The Chinese Bank Building, 61 Des)
Voeux Road Central, Hong Kong, this)
4th day of August, 2025.)

On Shanghai

Before me,


Daniel T.H. Kwong
Solicitor, HKSAR
Johnny K.K. Leung & Co.

This Affirmation is filed on behalf of the Plaintiff.

Plaintiff: Qin Shengzhi : 2nd : 4.8.2025

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5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

2ND AFFIRMATION OF QIN SHENGZHI

Affirmed on : 4th August, 2025

Filed on : 4th August, 2025

This Affirmation is filed on behalf of the Plaintiff.

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

Plaintiff: Qin Shengzhi: 2nd: 4.8.2025

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7th Defendant

This is the exhibit marked “QS-4” referred to in the 2nd Affirmation of QIN Shengzhi affirmed on the 4th day of August 2025.

<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
1.8.2025	“QS-4”	printout of the website	1

Before me,



Daniel T.H. Kwong
Solicitor, HKSAR
Johnny K.K. Leung & Co.

0x16e4c3721d65701642ff5ae4c959fca5bc1d9fe2b, 0xbdf91ca583ec6b3b37560b3781f2810985184dddf6, and 0x5a709e01f508fb56c333589d5dda835b1a61c1) AND Others

Hong Kong Court of First Instance
Action No. 625 of 2025

NOTICE TO PERSONS UNKNOWN DEFINED ABOVE

Date: 31 July 2025

On 30 July 2025, the Honourable Mr Justice David LOK granted an *ex parte* INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG ("Injunction") against you.

On 31 July 2025, the Honourable Mr Justice David LOK granted an *ex parte* AMENDED INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG ("Amended Injunction") against you.

TAKE NOTICE THAT if you, being the within-named Defendant, disobey or neglect to obey or comply with this Injunction, you may be held in contempt of Court and you may be sent to prison or fined or liable to process of execution to compel you to obey the Order. Any person who assists the Defendant in breaching the Order set out below may also be held in contempt of Court and may be sent to prison or fined.

Date: 3 April 2025

On 3 April 2025, the Honourable Mr Justice David LOK granted an *inter partes* INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG with consequential orders ("Injunction") against you.

TAKE NOTICE THAT if you, being the within-named Defendant, disobey or neglect to obey or comply with this Injunction, you may be held in contempt of Court and you may be sent to prison or fined or liable to process of execution to compel you to obey the Order. Any person who assists the Defendant in breaching the Order set out below may also be held in contempt of Court and may be sent to prison or fined.

COURT DOCUMENTS

Concurrent Amended Writ of Summons

Concurrent Writ of Summons

Amended Statement of Claim

Statement of Claim

Documents for upcoming hearing(s)

- *Inter partes* summons dated 1 August 2025
- *Inter partes* affidavit (to be uploaded)

Court orders already made

- *Ex parte* AMENDED INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG
- *Ex parte* INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG with consequential orders dated 30 July 2025
- *Ex parte* order dated 30 July 2025
- *Inter partes* INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG with consequential orders dated 3 April 2025
- *Ex parte* order dated 3 April 2025
- *Ex parte* INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG with consequential orders dated 27 March 2025
- *Ex parte* order dated 27 March 2025

Documents filed to the Court

Date: 25, 28 July 2025

- *Ex parte* summons dated 15 July 2025
- Second Affidavit of YAN YU YING dated 25 July 2025
- Fourth Affidavit of CHOW KAM PU dated 25 July 2025
- Skeleton Submissions of the Plaintiff dated 15 July 2025
- Supplemental Submissions of the Plaintiff dated 28 July 2025

Plaintiff: Qin Shengzhi: 2nd: 4.8.2025

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<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
1.8.2025	“QS-5”	printouts of the airdrops viewed on Etherscan at www.etherscan.io	3

Before me,



Daniel T.H. Kwong
Solicitor, HKSAR
Johnny K.K. Leung & Co.

ETH Price \$3,529.18 (+4.74%) Gas 0.292 Gwei

Search by Address / Txn Hash / Block / Token / Domain Name



Transaction Hash:

0x3c1e04a9b22ffd7ea69fbc7b14754d8e109ab23071035c906f8e39eb91ac2fb

Status:

Success

Block:

23045363 5257 Block Confirmations

Timestamp:

17 hrs ago (Aug-01-2025 09:33:35 AM UTC)

Sponsored



From:

0xD24cF4BD41B23CE27DeC9f58642e10493D01FA8e

Interacted With (To):

0xdcd00A8ef2B58b67D4901d0b319cf8173D919499

ERC-721 Tokens Transferred:

ERC-721 Token ID [0] Test(Test)
From Null 0x000 000 To 0x16e4c372-bc109FE2b

Value:

0 ETH (\$0.00)

Transaction Fee:

0.002856236516440534 ETH \$9.89

Gas Price:

0.470416918 Gwei (0.00000000470416918 ETH)

Ether Price:

\$3,487.02 / ETH

Gas Limit & Usage by Txn:

6,121,068 / 6,071,713 (99.19%)

Gas Fees:

Base: 0.439886643 Gwei / Max: 0.470416918 Gwei / Max Priority: 0.470416918 Gwei

Burnt & Txn Savings Fees:

Burnt: 0.002856236516440534 ETH (\$9.89) / Txn Savings: 0 ETH (\$0.00)

Other Attributes:

Txn Type: 2 (EIP-1559) / Nonce: 4 / Position in Block: 25

Input Data:

```
tokenURI string IN THE HIGH COURT OF THE HONG KONG SPECIAL ADMINISTRATION REGION COURT OF FIRST INSTANCE ACTION NO. 625 OF 2025 YAN YU YING ("Plaintiff") v Person(s) Unknown Category A (being person(s) unknown who own or operate the cryptocurrency addresses "0x16e4c372b055701542ff5a04c959fceb109fe2b" and "0xb791ca583ec63b37500b3701f28109651044dd6" and "0x5e709e0f5f500fbb56c333589d50da835b1a61c1") ("Persons Unknown") and others NOTICE TO PERSONS UNKNOWN DEFINED ABOVE On 25 July 2025 In the Court of First Instance in the High Court of Hong Kong Special Administrative Region China the Plaintiff filed an application for an order against you. On 30 July 2025
```

Switch Back View in Decoder

More Details:

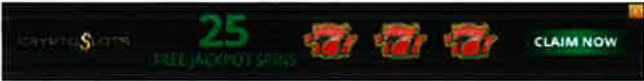
Click to show less

Private Note:

To access the Private Note feature, you must be [Logged In](#)

A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#)

Transaction Hash	0x529b012a8e0cab642d2d3127873abeb0dc8316d998f0a8696ca36e8fd3efefb2
Status	Success
Block	230454561182 Block Confirmations
Timestamp	17 hrs ago (Aug-01-2025 09:52:35 AM UTC)
Sponsored	<div><div><div><div>PayKassa</div></div><div><div>EXCHANGERS</div><div>BETTING</div></div><div><div>CASINO</div><div>HYIP</div></div><div><div>↔</div><div>\$</div></div></div></div>
From	0xD24cF48D41B23CE270eC9f58642e10493D01FA8e
Interacted With (To):	0x0c6d0A8ef2B5Bb67D49D1d0b319df8173D919499
ERC-721 Tokens Transferred:	<div>ERC-721 Token ID [1] Test</div> <div>From Null: 0x000...000 To 0xBf91ca58...65184DD06</div>
Value	0 ETH (\$0.00)
Transaction Fee	0.002688577040414321 ETH
Gas Price	0.444054317 Gwei (0.00000000444054317 ETH)
Ether Price	\$3,487.02 / ETH
Gas Limit & Usage by Txn:	6,103,833 6,054,613 (99.19%)
Gas Fees	Base: 0.43811068 Gwei Max: 0.444054317 Gwei Max Priority: 0.444054317 Gwei
Burnt & Txn Savings Fees:	<div><div>Burnt: 0.002688577040414321 ETH (\$9.36)</div><div>Txn Savings: 0 ETH (\$0.00)</div></div>
Other Attributes:	<div>Txn Type: 2 (BIP-1559)Nonce: 5Position in Block: 78</div>
Input Data:	<div>2 tokenURL string IN THE HIGH COURT OF THE HONG KONG SPECIAL ADMINISTRATION REGION COURT OF FIRST INSTANCE ACTION NO. 625 of 2025 YAN Yu Ying ("Plaintiff") v Person(s) Unknown Category A (being person(s) unknown who own or operate the cryptocurrency addresses "8x16e4c3721d65781542f15ae4c559fceb1d9fe2b" "8xbf91ca583ec6a3b37568b3781f28109651844dd8" and "8x5a789e8f5f5887bb56c333589d5d8a835b1a61c1") ("Persons Unknown") and others NOTICE TO PERSONS UNKNOWN DEFINED ABOVE On 25 July 2025 In the Court of First Instance in the High Court of Hong Kong Special Administrative Region China the Plaintiff filed an application for an order against you. On 30 July 2025</div> <div><div>Switch Back</div><div>View in Decoder</div></div>
More Details:	Click to show less
Private Note:	To access the Private Note feature, you must be Logged in

Transaction Hash	0xba5d0d027e337670719340f25ac6cc0ee78240dc8265081f98790be32e1eb9e
Status:	Success
Block:	2304595 5051 Block Confirmations
Timestamp	16 hrs ago (Aug-01-2025 10:20:23 AM UTC) Confirmed within 20 mins 22 secs
Sponsored	
From:	0xD24cF4BD41B23CE270eC9f58642e1D493D01FA8e
Interacted With (To):	0xdc6d0A8ef2B58b67D4901d0b319df8173D919499
ERC-721 Tokens Transferred:	<div>ERC-721 Token ID [2] Test(Test)</div> <div>From Null: 0x000...000 To Binance Dep: 0x5A709e...1A61c1</div>
Value:	0 ETH (\$0.00)
Transaction Fee:	0.002158946002270035 ETH 87.81
Gas Price:	0.356578695 Gwei (0.000000000356578695 ETH)
Ether Price	\$3,487.02 / ETH
Gas Limit & Usage by Txn	6,103,833 6,054,613 (99.19%)
Gas Fees:	Base 0.346696545 Gwei Max: 0.356578695 Gwei Max Priority: 0.356578695 Gwei
Burnt & Txn Savings Fees:	<div>Burnt: 0.002099113408412085 ETH (\$7.40) Txn Savings: 0 ETH (\$0.00)</div>
Other Attributes:	Txn Type 2 (EIP-1559) Nonce: 6 Position In Block: 186
Input Data:	<div> tokenURI string IN THE HIGH COURT OF THE HONG KONG SPECIAL ADMINISTRATION REGION COURT OF FIRST INSTANCE ACTION NO. 625 of 2025 YAN Yu Ying ("Plaintiff") v Person(s) Unknown Category A (being person(s) unknown who own or operate the cryptocurrency addresses "0x16e4c3721d65701542ff5ae4c959fceb1d9fe2b" "0xbf91ca583ec6b3b37560b3781f2818965184dd06" and "0x5a709e0f5f508fbb56c333589d5dda835b1a61c1") ("Persons Unknown") and others NOTICE TO PERSONS UNKNOWN DEFINED ABOVE On 25 July 2025 In the Court of First Instance in the High Court of Hong Kong Special Administrative Region China the Plaintiff filed an application for an order against you. On 30 July 2025 </div> <div> Switch Back View in Decoder </div>
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