

Plaintiff: Yan Yu Ying: 3rd: 13.8.2025

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

3RD AFFIRMATION OF YAN YU YING

I, Yan Yu Ying, of [REDACTED]

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

1. I am the Plaintiff in this action.
2. I make this affirmation in support of the inter-partes summons dated 8 August 2025.
3. 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.

AMENDMENT AND VARIATION CONCERNING D1

4. By the Order of the Honourable Mr Justice Lok dated 30 July 2025, the 7th Defendant was joined to the action. The 7th Defendant is/are person(s) unknown described by cryptocurrency addresses.
5. For the sake of consistency and clarity, I am advised to narrow the scope of the description of “person(s) unknown” in respect of D1, and describe D1 by cryptocurrency address in like manner.
6. The proposed amendments are shown in the Draft Re-Amended Writ of Summons and the Draft Re-Amended Statement of Claim.
7. I refer to the Recoveris.io Report dated 24 March 2025 exhibited in the First Affirmation of Chow Kam Pui as “CKP-1 [11]”. I am advised and believe that the 361 Bitcoins were first transferred from the Subject Addresses to one address. Thus, the owner or operator of that address was the first recipient of the 361 Bitcoins, and also the person whom I wish to target.
8. In consequence of the proposed amendments, D1 would only be referred to as the owner or operator of the said cryptocurrency address (“**the D1 Address**” as defined in Paragraph 2 of the Draft Re-Amended Statement of Claim).
9. I am advised and believe that if the Honourable Court allows the proposed amendments, it would be sufficient to serve documents on D1 by Bitcoin Ordinal Airdrop to the D1 Address.
10. Therefore, I am also advised to seek a variation of the order for substituted service in respect of D1, to the effect of changing the target address for airdrop from three Subject Addresses to the D1 Address only.

2ND BTO AGAINST D2

11. On 27 March 2025, the Honourable Court granted Bankers Trust orders against D2 to D6. The scope of the disclosure was limited to the cryptocurrency addresses identified in the Recoveris.io Report dated 24 March 2025.
12. I refer to the Bitrace Report dated 23 July 2025 exhibited in the Fourth Affirmation of Chow Kam Pui as “CKP-9”. It was discovered that:-
 - 12.1. The D7 Addresses are associated with D2; and
 - 12.2. The D7 Addresses were not identified in the Recoveris.io Report and were not within the scope of disclosure of the Bankers Trust Order dated 27 March 2025.
13. While the identity of D7 remains unknown, I am advised and believe that a Bankers Trust order against D2 would be necessary:
 - 13.1. It was discovered that D7 holds parts of the 361 Bitcoins;
 - 13.2. D2 holds client account information of D7's Addresses;
 - 13.3. There is a real prospect that the information may lead to the location or preservation of assets to which I am making a proprietary claim; and
 - 13.4. The potential advantage of the disclosure outweighs the detriment to the person against whom the order is sought, not merely in terms of costs but by way of invasion of privacy and requiring breach of obligations of confidence of the exchange to the customer.

DISPENSATION WITH SERVICE OF THE SUMMONS

14. To my knowledge, all Defendants except D3 have not filed and served the Acknowledgment of Service of Writ of Summons.

15. I humbly pray the Honourable Court to grant the orders sought.

AFFIRMED at Messrs. James W. L. Li)
& Co., Solicitors of Room 2204, China)
Insurance Group Building, 141 Des)
Voeux Road Central, Hong Kong, this)
13th day of August, 2025 the same having)
been duly interpreted to the Affirmant in)
the Cantonese dialect of the Chinese)
Language by Yun Kwok Wing Edwin.)

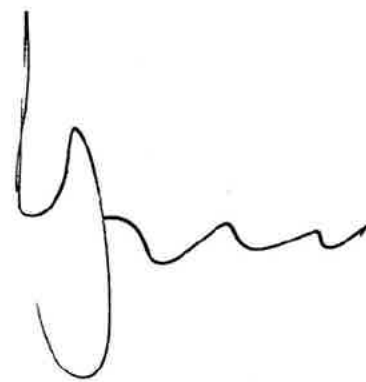


Before me,


James W.L. Li
Solicitor, Hong Kong SAR
李立本律師

I, Yun Kwok Wing Edwin, Solicitor of Messrs. Edwin Yun & Co., Solicitors of Room 1101, 11th Floor, Nos.54-58 Des Voeux Road Central, Hong Kong, do solemnly, sincerely and truly and affirm and say that I well understand the English and the Cantonese dialect of the Chinese Language and that I have truly, distinctly, audibly interpreted the contents of this documents to the Affirmant and that I will truly and faithfully interpreted the Affirmation about to be administered to her.

AFFIRMED at Messrs. James W. L. Li)
& Co., Solicitors of Room 2204, China)
Insurance Group Building, 141 Des)
Voeux Road Central, Hong Kong, this)
13th day of August, 2025.)



Before me,


James W.L. Li
Solicitor, Hong Kong SAR
李立本律師

This Affirmation is filed on behalf of the Plaintiff.

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7th Defendant

3RD AFFIRMATION OF YAN YU YING

Affirmed on : 13th August, 2025

Filed on : 13th 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