

Plaintiff: CHOW Kam Pui: 2nd: 28.3.2025

HCA625/2025

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

SECOND AFFIRMATION OF CHOW KAM PUI

I, CHOW Kam Pui, of the University of Hong Kong do solemnly, sincerely and truly affirm and say as follows:-

1. I am the same CHOW Kam Pui who affirmed the 1st Affirmation of CHOW Kam Pui on 26 March 2025.
2. There is now produced and shown before me an Exhibit Marked “CKP-3”, a document dated 27 March 2025 entitled “*Note on the Mechanics of P’s Proposed Substituted Service on D1-D5*”.

3. I confirm that that Exhibit “CKP-3” is an accurate representation of my advice (in so far as the technology/webpages are concerned).

AFFIRMED at Messrs. James W. L. Li).
& Co., Solicitors of Room 2204, China)
Insurance Group Building, 141 Des)
Voeux Road Central, Hong Kong, this)
28th day of March, 2025.)

Chu Ka Pui

Before me,

James W. L. Li

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

This Affirmation is filed on behalf of the Plaintiff.

Plaintiff: CHOW Kam Pui: 2nd : 28.3.2025
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6th Defendant

SECOND AFFIRMATION OF CHOW KAM PUI

Affirmed on : 28th March, 2025

Filed on : 28th March, 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: CHOW Kam Pui : 2nd : 28.3.2025

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HONG KONG SPECIAL ADMINISTRATIVE REGION
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6th Defendant

This is the exhibit marked “CKP-3” referred to in the Second Affirmation of CHOW Kam Pui affirmed on the 28th day of March 2025.

<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
27.3.2025	“CKP-3”	“Note on the Mechanics of P’s Proposed Substituted Service on D1-D5”	17

Before me,



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

(For resumed ex parte hearing before the Honourable Mr Justice David Lok)

YAN Yu Ying v

- D1: Person(s) unknown who received cryptocurrency originating from the Bitcoin Addresses stated at Paragraph 4 of the indorsement of claim up to 26 March 2025
- D2: 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
- D3: Persons Unknown being the individuals or companies or other entities that operate Coinbase.com
- D4: Persons Unknown being the individuals or companies or other entities that operate okx.com
- D5: Persons Unknown being the individuals or companies or other entities that operate gemini.com
- D6: Bitcoinforme S.L. trading as Bit2Me

**Note on the Mechanics of P's
Proposed Substituted Service
on D1-D5**

1. This document has been reviewed by Dr Chow. He is willing to affirm a supplemental affirmation exhibiting this as an accurate representation of his advice (in so far as the technology/webpages are concerned).
2. P is grateful for the Honourable Court's indulgence. There is now before the Court a bundle containing Chow 1 and Exhibit CKP-1
 - 2.1. The body of Chow 1 is at the beginning of the bundle.
 - 2.2. Exhibit CKP-1 is now divided into 9 tabs, starting from Tab 10 and ending at Tab 18 (the same cross-reference used in the body of Chow 1 itself).

- 2.3. Exhibit CKP-1 is now also paginated 1-259.
3. P will refer to the relevant pages by **[Chow p.1 §1]** and **[Exhibit 1/1]** below.
4. P is seeking the following orders of substituted service.

D1 (against whom injunctive relief is sought)

5. P proposes to serve D1 by posting a Bitcoin Ordinal to the following 3 bitcoin addresses.
 - 5.1. 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw (which until recently had around 300 Bitcoins)
 - 5.2. 3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam (ibid. around 38 Bitcoins)
 - 5.3. 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu (ibid. around 23 Bitcoins).
6. The mechanics are illustrated in the USA case of *Chow v Defendant 1* 2:24-cv-00480-DJP-DPC.
7. In that case, one of the relevant Bitcoin addresses are 3JMjHDTJJKPnrvS7DycPAgYcA6HrHRk8UG. See **[Exhibit 12/85]**.
8. After the text messages is posted on that address, anyone can search that 3JMjHDTJJKPnrvS7DycPAgYcA6HrHRk8UG on <https://ordiscan.com> for inscriptions.
9. See **[Exhibit 12/84]**, where there is Inscription #70,323,799. The “owner” of that inscription is stated to be “3JMjHDTJ...HrHRk8UG”.
10. The inscription itself is a body of text. It is partially printed at **[Exhibit 12/83]** and is reproduced below. A better print out is also annexed to this Note.

“VIRGINIA S. CHOW

v.

DEFENDANT "1" a/k/a "KAI XUAN WANG" and JOHN DOES 1-20, as yet unidentified Individuals, Business Entities and/or Unincorporated Associations.

*United States District Court Eastern District of Louisiana
Case No. 2:24-cv-00480-DJP-DPC*

SEE IMPORTANT LEGAL NOTICES BELOW

On April 15, 2024, in the United States District Court for the Eastern District of Louisiana, VIRGINIA S. CHOW filed a Second Amended Complaint for Conversion of Stolen Cryptocurrencies.

The filings and orders in this matter are available at the URL link below:

<https://usdcccourtsservice.com/cv-00480/>

NOTICE NO. 1 TO DEFENDANTS

If you fail to respond to this Complaint, judgment by default will be entered against you for the relief demanded in the Complaint for Conversion of Stolen Cryptocurrencies.

To prevent this from happening, you must file a response with the court clerk or administrator within 21 days from the date this message was posted. Your response must be in proper form and have proof of service on the Plaintiffs' attorney:

*Reagan Charleston Thomas
Aylstock, Witkin, Kreis and Overholtz, PLLC*

*17 East Main Street, Suite 200
Pensacola, Florida 32502*

NOTICE NO. 2 TO DEFENDANTS

On April 5, 2024, VIRGINIA S. CHOW filed an Emergency Motion for a Temporary Restraining Order without Notice to Defendants, which was granted on April 16, 2024. A hearing to determine whether to convert this temporary restraining order into a preliminary injunction is set for April 24, 2024, at 3:00 P.M. in Courtroom C-555 in front of the Honorable Judge Darrel James Papillion.

NOTICE NO. 3 TO DEFENDANTS

On April 23, 2024, VIRGINIA S. CHOW filed a Motion for Continuance, which was granted on April 23, 2024. A hearing to determine whether to convert the temporary restraining order into a preliminary injunction is set for April 30, 2024, at 11:00 A.M. in New Orleans, Louisiana in front of the Honorable Judge Darrel James Papillion.

For further details, see the filings below, including the Order Granting Temporary Restraining Order dated April 16, 2024.”

11. If one then clicks on <https://usdcourtsservice.com/cv-00480/>, one will then see the webpage at **[Exhibit 12/72]**.
12. P proposes to do essentially the same for this action.
 - 12.1. A draft form of words of the proposed Bitcoin Ordinal inscription is provided at the annex to this note.
 - 12.2. An appropriately worded URL of the website will be selected. If required,

P can file evidence on substituted service on D1 on the return date.

- 12.3. P's residential address is stated on Yan 1, and Exhibit YYY-1 also contains private information (e.g. her HKID and birth date on the police report). Chow 1 exhibits the investigation report by Recoveris [Exhibit 11/22], where its methodology is revealed [Exhibit 11/29-30]. P proposes to require a password before the affirmation and exhibit can be downloaded. The proposed mechanics are explained at the annex to this note.

D2-D5 (against whom only Bankers Trust relief is sought at this stage)

D2: email to "legal@binance.com" and message via Bitcoin Support

13. For how the email was obtained, see [Chow p.13/§55] and [Exhibit 13/153 at 159].
14. For Binance support [Chow p.13/§56] and [Exhibit 13/161], when one clicks on the hyperlink over the words "Binance support", one is then taken to the <https://www.binance.com/en/support>.
15. What happens below is not recorded in CKP-1 as it stands but is shown in the screenshots attached (they have been reviewed and will be introduced as evidence in a further affirmation by Dr Chow).
- 15.1. There is a chat button at the lower right corner,
- 15.2. When one clicks one it, one is then invited to either log in or continue as a visitor.
- 15.3. A phone number or email address is required to continue as a visitor.
- 15.4. If one continues as a visitor, one is then given an option to chat with a chatbot called Binance Assistant, where arbitrary text can be entered.

16. The proposed text message to Binance via the Binance Support is as follows.

“IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATION REGION
COURT OF FIRST INSTANCE
ACTION NO. [_____]
YAN Yu Ying (“Plaintiff”)
V

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 and others

IMPORTANT LEGAL NOTICE

We act for the Plaintiff in HCA [number] of 2025 in the High Court in Hong
Kong.

The Honourable Court has granted us an ex parte order and ordered
substituted service by way of email to “legal@binance.com” and by the
use of Binance Support.

Please see a link to a [webpage to be created], where you will can
download the Order of the Honourable Mr Justice David LOK dated 27
March 2025.

The order requires you to disclose certain information to us.

If you intend to contest the Order, you must attend before the High Court
in Hong Kong at 38 Queensway, Admiralty, Hong Kong on Thursday 3 April
2025 at 9:30am.

If you require any further information, please do not hesitate to contact
us. Our contact details are listed on the Hong Kong Law Society website at

<https://www.hklawsoc.org.hk/en/Serve-the-Public/The-Law-List/Firm-Detail?FirmId=998>.

Edwin Yun & Co, Solicitors for the Plaintiff”

D3: by post to the Coinbase Legal Team at this address: 248 3rd St #434, Oakland CA, 94607

17. See [Chow p.15/§62] and [Exhibit 14/166 at 177], being a print out of <https://www.coinbase.com/legal/us>

D4: by email to enforcement@okx.com

18. See [Chow p.17/§72] and [Exhibit 16/198], being a print out of https://support.gemini.com/hc/en-us/requests/new?ticket_form_id=1260809732969 (which is hyperlinked from the “Contact” option on the Gemini homepage [Chow p.17 §74]).

D5 by using the “Submit a Request” function on gemini.com

19. See [Chow p.16/§68] and [Exhibit 15/181 at 182], being a print out of <https://www.okx.com/help/okx-law-enforcement-request-guide>

Dated 27 March 2025

JASPER WONG
Counsel for P

Annex: Proposed inscription on the Subject Addresses

“IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATION REGION
COURT OF FIRST INSTANCE

ACTION NO. [____]

YAN Yu Ying (“Plaintiff”)

v

Person(s) unknown who received cryptocurrency originating from the following
Bitcoin Address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw, Bitcoin Address
3BGJuYeHak3WhSjSrknz25XJnE23dFiQam and Bitcoin Address
39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu up to 26 March 2025 (Hong Kong Time)
 (“Persons Unknown”) and others

NOTICE TO PERSONS UNKNOWN DEFINED ABOVE

On 26 March 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 27 March 2025, the Honourable Mr Justice David LOK granted an order against
you which can be downloaded from [URL link]. The Honourable Court furthered
ordered substituted service by means of Bitcoin Ordinal inscription at the above
addresses.

If you wish to contest this Order, you must attend before the Hong Kong High Court
at 38 Queensway, Admiralty, Hong Kong on 3 April 2025 at 9:30am.

If you fail to respond to this action, judgment by default will be entered against you for the relief demanded on the Writ of Summons which can be downloaded from [URL link].

Relevant court documents in this matter are available at the URL link below:
[URL link].

Please note some documents contain private and confidential information and are password-protected or redacted.

To obtain the password or unredacted versions of documents, please file an Acknowledgement of Service and contact the Plaintiff's solicitors Messrs. Edwin Yun & Co. whose contact details are listed at the Hong Kong Law Society website at <https://www.hklawsoc.org.hk/en/Serve-the-Public/The-Law-List/Firm-Detail?FirmId=998>.

Instructions on filing an Acknowledgement of Service is provided in the Writ. Please note we may withhold the password or unredacted documents until we receive the Acknowledgment of Service from the High Court.

Edwin Yun & Co, Solicitors for the Plaintiff"

text/plain; charset=utf-8

VIRGINIA S. CHOW

v.

DEFENDANT "1" a/k/a "KAI XUAN WANG" and JOHN DOES 1-20, as yet unidentified Individuals, Business Entities and/or Unincorporated Associations.

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NOTICE NO. 1 TO DEFENDANTS

Inscription #70,323,799

Inscription ID

84e68186addc0c75349504730bd98cc537db90ad9... 2a1488i0 

Owner

3JMjHDTJ...HrHRk8UG

Content size

2.07 kB

Sat number

1,966,877,807,407,242

Creation date

Apr 24, 2024 at 10:10 PM (11 months ago)

Creation transaction

84e68186...fd2a1488

Creation block

840,668

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Share this inscription:

<https://ord.link/70323799>



Activity

Type	From	To	Tx	Date
Inscribed		3JMjHDTJ...HrHRk8UG	84e68186...fd2a1488	Apr 24, 2024 at 10:10 PM





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Reset Password



Reset Phone Security
Verification



Change Email Address



Crypto Deposit Not Credited



Appeal P2P Performance
Metrics



Assets Frozen Due to P2P
Dispute



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Metrics



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



Appeal P2P Performance
Metrics



Assets Frozen Due to P2P
Dispute



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