

Plaintiff: QIN Shengzhi: 1st: 31.3.2025
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

AFFIRMATION OF QIN SHENGZHI

I, QIN Shengzhi, of Chow Yei Ching Building, the University of Hong Kong, Pok Fu Lam, Hong Kong 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 am instructed by the Plaintiff's solicitors Messrs Edwin Yun & Co ("EYC") to carry out the substituted service order against the 1st Defendant in this action on an urgent basis.
4. 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.
5. 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 knowledge, information and belief.
6. 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.

7. In full and frank disclosure, one of my PhD supervisors was Dr CHOW Kam Pui, who has previously affirmed two affirmations in this action.
8. 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 D1

9. I am advised by EYC and believe that
 - 9.1. on 27 March 2025, the Honourable Court granted an order against the 1st Defendant in this action, i.e. person(s) unknown who received cryptocurrency originating from the following Bitcoin addresses up to 26 March 2025:-
 - 9.1.1. 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw
 - 9.1.2. 3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam
 - 9.1.3. 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu
(“Subject Addresses”) (“D1”)
 - 9.2. on the same day, the Honourable Court made an order of substituted service on D1, i.e.

“17. The Plaintiff may serve the writ of summons, this injunction, and subsequent court documents and correspondence:

17.1. to D1 by **Bitcoin Ordinal Airdrop** to the Subject Addresses defined at Paragraph 4 of the Indorsement of Claim.” (Emphasis added)

- 9.3. EYC had undertaken to serve the D1 in materially the same manner as described in the “Note on the Mechanics of P’s Proposed Substituted Service on D1-D5” (“**Note on Mechanics**”) dated 27 March 2025, which was later exhibited to the Second Affirmation of CHOW Kam Pui filed on 28 March 2025.
- 9.4. This is now produced and shown to me marked Exhibit “**QS-1**” a copy of the said Note on Mechanics.
10. I was instructed by EYC to fulfil this undertaking.

Choosing a URL and setting up a website

11. On EYC’s instructions, I purchased the domain <https://www.hca625of2025.com/>, created a homepage and uploaded documents to the website.
12. There is now produced and shown to me marked Exhibit “**QS-2**” a printout of the said website.
13. For the avoidance of doubt, I was instructed on an urgent basis, and there may be minor matters I overlooked while I set up the website. It may also be the case that in the fullness of time, detailed arrangements of the website may need to be reviewed (e.g. to better protect parties’ privacy).
14. However, to my knowledge and believe, there are no issues with the website which would prevent an ordinary web user (with an internet connection and a browser) to visit the website and view/download the court documents there via the provided hyperlinks.


Bitcoin Ordinal Inscription

- 15. I was also instructed to send a specific form of text (which was provide to me by EYC) to the Subject Addresses by way of Bitcoin inscription.
- 16. I duly did so. I believe that from now, the inscriptions I made will be visible to anyone who explores the Subject Addresses with a Bitcoin Ordinal Explorer.
- 17. There is now produced and shown to me marked Exhibit “QS-3” a printout of the said Bitcoin Ordinals from <https://ordiscan.com/>.

AFFIRMED at Messrs. Johnny K.)
K. Leung & Co., Solicitors of)
16th Floor, The Chinese Bank)
Building, 61 Des Voeux Road)
Central, Hong Kong, this 31st day)
of March, 2025.)

On Shengzhi

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: 1st: 31.3.2025
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GEMINI.COM

5th Defendant

BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

AFFIRMATION OF QIN SHENGZHI

Affirmed on : 31st March, 2025

Filed on : 31st 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: QIN Shengzhi: 1st: 31.3.2025

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6th Defendant

This is the exhibit marked “QS-1” referred to in the Affirmation of QIAN Shengzhi affirmed on the 31st day of March 2025.

<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
28.3.2025	“QS-1”	Copy of Note on Mechanics	19

Before me,



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

Plaintiff: CHOW Kam Pui : 2nd : 28.3.2025

HCA625/2025

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

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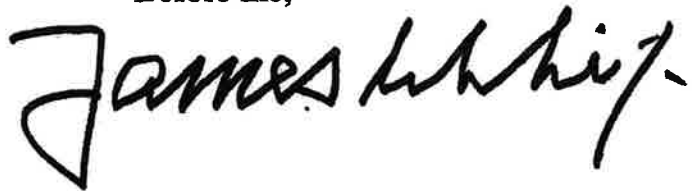
BITCOINFORME S.L. TRADING AS BIT2ME

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 3JMjHDTJjKPnrV57DycPAgYcA6HrHRk8UG. See [Exhibit 12/85].
8. After the text messages is posted on that address, anyone can search that 3JMjHDTJjKPnrV57DycPAgYcA6HrHRk8UG 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://usdccourtservice.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://usdcccourtsservice.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

Inscription #70,323,799

VIRGINIA S. CHOW

v.

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

United States District Court Eastern District of
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Case No: 2:24-cv-00480-DJB-DRC

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NOTICE NO. 1 TO DEFENDANTS

Inscription ID

84e68186addc0c75349504730bd98cc537db90ad9... 2a1488i0 

Owner

3JM5HDTJ...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

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.

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text/plain;charset=utf-8

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Reagan Charleston Thomas
Aylstock, Wilton, Kreis and Overholtz, PLLC
17 East Main Street, Suite 200
Pensacola, Florida 32502

NOTICE NO. 2 TO DEFENDANTS

On April 6, 2024, VIRGINIA S. CHOI filed an Amended Motion for a Temporary Restraining Order against

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

On April 23, 2024, VIRGINIA S. CROW 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 Daniel James Papillion.

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

Share this inscription:

<https://ord.link/70323799>

Activity

Type	From	To	Tx	Date
✎ Inscribed		3JMjHDTJ...HrHR&8UG	84e68186...fd2a1488	Apr 24, 2024 at 10:10 PM

How can we help you?

 Search

Search

Self-Service



Verify Account



Reset Password



Reset Phone Security
Verification



Change Email Address



Reset Google Authenticator

How can we help you?

 Search



Self-Service



Verify Account



Reset Password



Reset Phone Security
Verification



Change Email Address



Crypto Deposit Not Credited




Appeal P2P Performance
Metrics




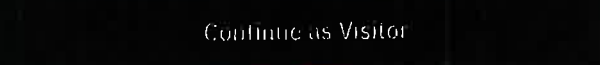
Assets Frozen Due to P2P
Dispute



View All Self Service



Please log in first, in order to assist you with your account settings.

How can we help you?

Search

Search

Self-Service



Verify Account



Reset Password



Reset Phone Security
Verification



Change Email Address



Crypto Deposit Not Credited



Appeal P2P Performance
Metrics



Assets Frozen Due to P2P
Dispute



View All Self Service


Connect With Us

Verify Email/Phone Number

Start Chat as Visitor

X

How can we help you?

 Search

[Search](#)

Self-Service



Verify Account



Reset Password



Reset Phone Security
Verification



Change Email Address



Crypto Deposit Not Credited



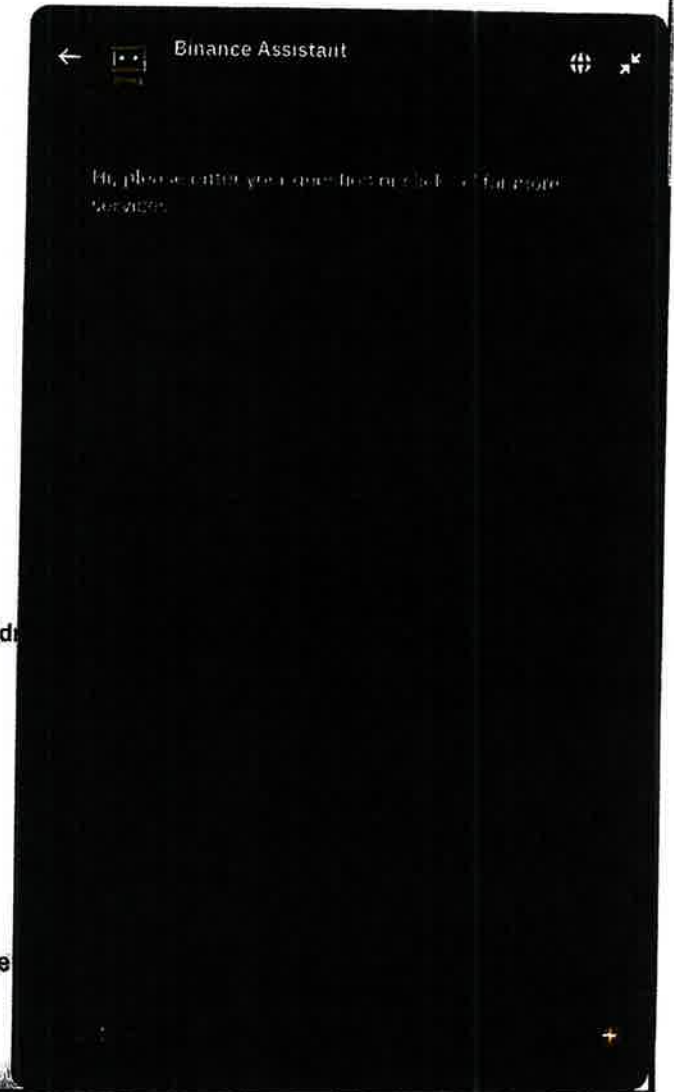
Appeal P2P Performance
Metrics



Assets Frozen Due to P2P
Dispute



View All Self Service



Plaintiff: QIN Shengzhi: 1st: 31.3.2025

HCA625/2025

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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

This is the exhibit marked “QS-2” referred to in the Affirmation of QIAN Shengzhi affirmed on the 31st day of March 2025.

<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
29.3.2025	“QS-2”	a printout of the website https://www.hca625of2025.com/	2

Before me,



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

YAN Yu Ying

v

**Person(s) unknown who received
cryptocurrency originating from the Bitcoin
Address**

**32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw,
Bitcoin Address**

**3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam and
Bitcoin Address**

**39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu up
to 26 March 2025 (Hong Kong Time) and others**

Hong Kong Court of First Instance

Action No. 625 of 2025

NOTICE TO PERSONS UNKNOWN DEFINED ABOVE

Date: 29 March 2025

On 27 March 2025, the Honourable Mr Justice David LOK granted an ex parte **INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG with consequential orders ("Injunction")** against you.

If you wish to contest this Injunction, you must attend before the Hong Kong High Court at 38 Queensway, Admiralty, Hong Kong on **3 April 2025 at 9:30am** as per the **inter partes summons** to be filed on Monday.

COURT DOCUMENTS

Concurrent Writ of Summons

Documents for upcoming hearing(s)

- *Inter partes* Summons to be filed on Monday
- *Skeleton Argument for the Plaintiff (to be uploaded)*
- *Affirmation of Service (to be uploaded)*

Court orders already made

- 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

- P's Skeleton Submissions for (a) service out of jurisdiction against all D (b) injunctive relief against D1 (c) Bankers Trust relief against D2-6
- First Affirmation of YAN Yu Ying with exhibit YYY-1
- First Affirmation of CHOW KAM Pui with exhibits
- Second Affirmation of CHOW KAM Pui with exhibit CKP-3

Please note that some of the 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. Their contact details are:

- Address: RM 1101, 11/F, SBI CENTRE, 54-58 DES VOEUX ROAD CENTRAL, HONG KONG
- Telephone: +852 2815 5116
- Fax: +852 2815 5269

You may verify the above contact details at the Hong Kong Law Society website at <https://www.hklawsoc.org.hk/>.

Plaintiff: QIN Shengzhi: 1st: 31.3.2025

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

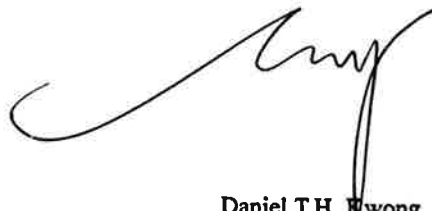
BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

This is the exhibit marked “QS-3” referred to in the Affirmation of QIAN Shengzhi affirmed on the 31st day of March 2025.

<u>Date</u>	<u>Exhibit mark</u>	<u>Description</u>	<u>No. of sheet</u>
----	“QS-3”	a printout of the said Bitcoin Ordinals from https://ordiscan.com/	18

Before me,



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

14:30

22%



Loading webpage

https://ordiscan.com/inscription/91811113



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

ACTION NO. 625 OF 2025

YAN Yu Ying ("Plaintiff")

v

Person(s) unknown who received cryptocurrency
originating from

Bitcoin Address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw,

Bitcoin Address 3BGJuYeHak3WhSjSrknz25XJnE23dFiQam

and

Bitcoin Address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu

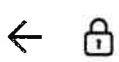
up to 26 March 2025 (Hong Kong Time)

("Persons Unknown") and others

NOTICE TO PERSONS UNKNOWN DEFINED ABOVE

On 27 March 2025, the Honourable Mr Justice David
LOK granted an order against you which can be





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NOTICE TO PERSONS UNKNOWN DEFINED ABOVE

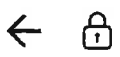
On 27 March 2025, the Honourable Mr Justice David LOK granted an order against you which can be downloaded from www.hca625of2025.com (the "website").

The Honourable Court further ordered substituted service by means of Bitcoin Ordinal inscription at the three Bitcoin addresses above.

If you wish to contest these orders, 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, default judgment will be entered against you for the relief demanded on the Writ of Summons which can be downloaded from the website.





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Name: Messrs. Edwin Yun & Co.

Address: RM 1101, 11/F, SBI CENTRE, 54-58 DES VOEUX ROAD CENTRAL, HONG KONG

Telephone: +852 2815 5116

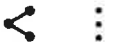
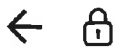
Fax: +852 2815 5269

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Instructions on filing an Acknowledgment of Service are 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





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Edwin Yun & Co, Solicitors for the Plaintiff

Inscription #91,811,113

Inscription ID

1a3c139928b403618d29778c6496662f822a32b6021bcec5af68... fd06bdi0

Owner

32stz4yr...ZUH3wckw

Content size

2.23 kB

Sat number

1,737,332,907,635,827

Creation date

Mar 29, 2025, 11:00 PM (1 day ago)

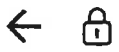
Creation transaction

1a3c1399...5dfd06bd

Creation block

889,984





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Content size

2.23 kB

Sat number

1,737,332,907,635,827

Creation date

Mar 29, 2025, 11:00 PM (1 day ago)

Creation transaction

1a3c1399...5dfd06bd

Creation block

889,984

Activity

Type	From	To	Tx	Date
Inscribed		32stz4yr...ZUH3wckw	1a3c1399...5dfd06bd	Mar 29, 2025,





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

ACTION NO. 625 OF 2025

YAN Yu Ying ("Plaintiff")

v

Person(s) unknown who received cryptocurrency
originating from

Bitcoin Address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw,

Bitcoin Address 3BGJuYeHak3WhSjSrKz25XJnE23dFiQam

and

Bitcoin Address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu

up to 26 March 2025 (Hong Kong Time)

("Persons Unknown") and others

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Relevant court documents in this matter are



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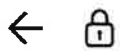
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Edwin Yun & Co, Solicitors for the Plaintiff





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Edwin Yun & Co, Solicitors for the Plaintiff

Inscription #91,811,192

Inscription ID

ce43932aaed11d5899beb46ecd74034d072b994957160a83667... ca6748i0

Owner

3BGJuYeH...23dFiQam

Content size

2.23 kB

Sat number

1,737,332,907,641,398

Creation date

Mar 29, 2025, 11:05 PM (1 day ago)

Creation transaction

ce43932a...84ca6748

Creation block

889,985





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Content size

2.23 kB

Sat number

1,737,332,907,641,398

Creation date

Mar 29, 2025, 11:05 PM (1 day ago)

Creation transaction

ce43932a...84ca6748

Creation block

889,985

Activity

Type	From	To	Tx	Date
Inscribed		3BGJuYeH...23dFiQam	ce43932a...84ca6748	Mar 29, 2025





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

ACTION NO. 625 OF 2025

YAN Yu Ying ("Plaintiff")

v

Person(s) unknown who received cryptocurrency
originating from

Bitcoin Address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw,

Bitcoin Address 3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam

and

Bitcoin Address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu

up to 26 March 2025 (Hong Kong Time)

("Persons Unknown") and others

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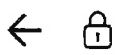
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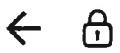
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Edwin Yun & Co, Solicitors for the Plaintiff





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Edwin Yun & Co, Solicitors for the Plaintiff

Inscription #91,812,104

Inscription ID

0698eac3b971d9431b62fb03e7a9bab137e59b45beb1188d6a18... d3609ci0

Owner

39Hb58Ck...Gt7hwUDu

Content size

2.23 kB

Sat number

1,737,332,907,647,854

Creation date

Mar 29, 2025, 11:15 PM (1 day ago)

Creation transaction

0698eac3...76d3609c

Creation block

889,987



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Blocks Incriptions Runes

Connect



Content size

2.23 kB

Sat number

1,737,332,907,647,854

Creation date

Mar 29, 2025, 11:15 PM (1 day ago)

Creation transaction

0698eac3...76d3609c

Creation block

889,987

Activity

Type	From	To	Tx	Date
Inscribed		39Hb58Ck...Gt7hwUDu	0698eac3...76d3609c	Mar 29, 202