

HCA 625 / 2025

HCA 2295 /2019

*(For return date hearing before the Honourable Mr Justice Lok  
on 3 April 2025 at 10:00am)*

YAN Yu Ying v Persons Unknown and 5 exchanges

YAN Yu Ying v LEUNG Wing Hei

**P's Abridged Skeleton Submissions (for service on D1)**

**Introduction**

1. This is the hearing of P's two application by *inter partes* summonses filed on 31 March 2025 for:-
  - 1.1. A final order granting leave to serve out of jurisdiction and substituted service in HCA 625 of 2019; an order in terms of the injunction and *Bankers Trust* orders be continued pending trial of the action; and
  - 1.2. A final order releasing P from undertakings relating to the use of information in HCA 2295 of 2019.
2. The HCA 2295 of 2019 order was served to solicitors to the defendant in that case (Mr Leung Wing Hei).
3. For HCA 625 of 2025, P has filed two affirmations on service: the Affirmation of QIN Shengzhi on 31 March 2025 ("**Qin 1**") and ...
4. ...

## **HCA 2295 of 2019 summons**

5. In the absence of opposition, P prays for an order in terms of the summons.

### **Service on D1 (Persons Unknown) by Bitcoin Ordinal**

6. Substituted service on D1 was effected by Dr QIN Shengzhi, a recent PhD graduate from the Department of Computer Science at the University of Hong Kong, on Saturday 29 March 2025.

7. For the Honourable Court's ease of reference, the final form of words inscribed are as follows,

“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 downloaded from [www.hca625of2025.com](http://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.

**Relevant court documents in this matter are available on the website.**

**Unless the Honourable Court directs otherwise, subsequent court documents and correspondence will be served to you via the website.**

**You are advised to refer to the website and contact us immediately should you wish to contest any application we make against you.**

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 us. Our contact details are as follows:

...

Edwin Yun & Co, Solicitors for the Plaintiff” (Emphasis added)

8. This is materially the same as the approach taken in the USA case of *Chow v Defendant 1* as explained and exhibited by Dr Chow in Chow 1 and Chow 2.
9. In the premises, P respectfully invites the Honourable Court to (1) grant leave to serve out of jurisdiction and substituted service against D1 and (2) continue the injunction pending trial of this action.

...

Dated 1 April 2025

JASPER WONG  
Counsel for P