

HCA 625 /2025

30 JUL 2025

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



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

BEFORE THE HONOURABLE MR. JUSTICE LOK IN CHAMBERS

(NOT OPEN TO THE PUBLIC)

ORDER

UPON the application of the Solicitors for the Plaintiff by way of *ex parte* summons dated 25 July 2025

AND UPON reading the 2nd Affirmation of YAN Yu Ying dated 25 July 2025 and the 4th Affirmation of CHOW Kam Pui dated 25 July 2025 together with the exhibits referred to therein

AND UPON hearing counsel for the Plaintiff

IT IS ORDERED that:-

1. “*Person(s) Unknown Category A*” be joined as the 7th Defendant in the action;

2. Leave be granted to the Plaintiff to amend the Writ of Summons and the Statement of Claim as annexed hereto;
3. Injunction in terms of the "*INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG AGAINST THE 7TH DEFENDANT*" as annexed be granted;
4. Liberty to apply; and
5. Costs be reserved.

Dated the 30th day of July 2025

Registrar

HCA 625/2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
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ACTION NO.625 OF 2025

BETWEEN

YAN YU YING (忻汝英)

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6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

O R D E R

Filed on : 30 July 2025

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

Claim nature:
A. * ~~Monetary Claim/Non-Monetary Claim~~/Mixed Claim
B. Trust

Amended as in red this day
of pursuant to
the Order made by
dated

No. 1
Draft Amended Writ of Summons
(O. 6 r. 1)

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Registrar

**IN THE HIGH COURT OF THE
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6th Defendant

TO the 1st Defendant 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 of unknown address

TO the 2nd 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 of unknown address

TO the 3rd Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE COINBASE.COM of unknown address

TO the 4th Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE OKX.COM of unknown address

TO the 5th Defendant PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE GEMINI.COM of unknown address

TO the 6th Defendant BITCOINFORME S.L. TRADING AS BIT2ME of Calle Germán Bernacer, 69, 03203, Elche, Alicante, Spain of unknown address

TO the 7th Defendant PERSON(S) UNKNOWN CATEGORY A of unknown address

THIS AMENDED WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the back.

Within (14 days) after the service of this Amended Writ on you, counting the day of service, you must either satisfy the claim or return to the Registry of the High Court the accompanying AMENDED ACKNOWLEDGMENT OF SERVICE stating therein whether you intend to contest these proceedings or to make an admission.

If you fail to satisfy the claim or to return the Amended Acknowledgment within the time stated, or if you return the Amended Acknowledgment without stating therein an intention to contest the proceedings or to make an admission, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

*[If you intend to make an admission, you may complete an appropriate form enclosed in accordance with the accompanying Directions for Amended Acknowledgment of Service.]

Issued from the Registry of the High Court this 28th day of March 2025.

Registrar

Note: – This Writ may not be served later than 12 calendar months beginning with that date unless renewed by order of the Court.

IMPORTANT

Directions for Amended Acknowledgment of Service are given with the accompanying form.

AMENDED INDORSEMENT OF CLAIM

1. The Plaintiff is the victim of Bitcoin theft.
2. She is the plaintiff in High Court Action Number 2295 of 2019, where her case is that Mr LEUNG Wing Hei ("**Mr Leung**") (the defendant in that case) has stolen around 1,000 Bitcoins from her in 2018 ("**1,000 Bitcoins**").
3. In 2022, the Hong Kong Court of First Instance ordered Mr Leung not to dispose of around 364.46378963 Bitcoins that he still held from the 1,000 Bitcoins.
4. Prior to 12 March 2025, of the around 364.46378963 Bitcoins, around 361 Bitcoins were held in the following bitcoin addresses:
 - 4.1. around 300 in the address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw
 - 4.2. around 38 in address 3BGJuYeHak3WhSjSrkJnE23dFiQam
 - 4.3. around 23 in bitcoin address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu("361 Bitcoins") ("**Subject Addresses**")
5. On 12 March 2025, the 361 Bitcoins were transferred away and therefore stolen from the Subject Addresses. Mr Leung denies knowledge or responsibility of these transfers.
6. After the discovery of the theft, the Plaintiff instructed investigators to investigate the recipients of the 361 Bitcoins.
7. On 24 March 2025, the Plaintiff received a report from her investigator Mr Umberto BUONORA of Recoveris.io a "*Forensic Memo on Fraud Incident*" ("**Report**"). The Report shows that:-
 - 7.1. a "*complex and vast layering scheme*" had taken place involving around 365 identifiable transfers within around 8 days on an initial investigation

- 7.2. parts of the 361 Bitcoins were transferred to accounts associated with the 2nd, 3rd, 4th, 5th, 6th Defendants, who are centralised cryptocurrency exchanges with know your customer (“KYC”) policies.
8. Investigations are ongoing, and the Plaintiff will apply to join further parties if necessary.
9. By reason of the above, the Defendants holds the 361 Bitcoins and their traceable proceeds on constructive trust on behalf of the Plaintiff.
10. The Plaintiff seeks recovery of the 361 Bitcoins and damages from the Defendants and will rely on fraud, conversion, misuse of private information, unjust enrichment, monies had and received, constructive trust, and equity.

AND THE PLAINTIFF CLAIMS AGAINST THE DEFENDANTS FOR:

- (1) A declaration that the 361 Bitcoins paid to the 1st and 7th Defendants belonged to the Plaintiff at the time of receipt
- (2) A declaration that the Defendants as trustees or constructive trustees are liable to account for the 361 Bitcoins, including their traceable proceeds thereof, and an order that that the Defendants pay to the Plaintiff those monies, payments and profits due on taking of account
- (3) Damages for dishonest assistance in the misappropriation of the 361 Bitcoins
- (4) Damages for the Defendants’ unjust enrichment at the Plaintiffs’ expense
- (5) Damages for knowing receipt of the funds beneficially owned by the Plaintiff and account to the Plaintiff for the same
- (6) An order that the Defendants do transfer to the Plaintiff such funds held and/or received
- (7) All necessary consequential or further accounts, inquiries or orders

- (8) Interest on any sum ordered to be paid by any party at such rate and for such period as this Honourable Court deems pursuant to Sections 48 and 49 of the High Court Ordinance
- (9) Further and other relief
- (10) Costs

~~Dated 26 March 2025~~

~~**JASPER WONG**
Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.
~~**EDWIN YUN & CO.**
Solicitors for the Plaintiff~~

Dated July 2025

JUSTIN W.T. LAM
Counsel for the Plaintiff

EDWIN YUN & CO
Solicitors for the Plaintiff

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this General Indorsement are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 26th day of March, 2025.~~

~~日期：2025 年 3 月 26 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

I, YAN YU YING, the Plaintiff, believes that the facts stated in this Amended Indorsement of Claim are true.

本人，忻汝英，原告人，真誠相信上述所述的事實為真實。

Dated this day of , 2025.

日期：2025 年 月 日

YAN YU YING

請注意

因這是法律文件，忽視它可帶來嚴重後果。如有疑問，請儘早向發出文件的法院登記處：

香港金鐘道 38 號高等法院低層 1 樓查詢。

你亦應考慮聽取律師的意見或是申請法律援助。

TAKE NOTICE

This is a legal document. The consequences of ignoring it may be serious. If in doubt, you should enquire as soon as possible at the Registry of the Court issuing the document, namely :

LG1, High Court Building, 38 Queensway, Hong Kong.

You should also consider taking the advice of a Solicitor or applying for Legal Aid.

Amended Acknowledgment of Service of Amended Writ of Summons
(O. 12 r. 3)

Directions for Amended Acknowledgment of Service

1. The accompanying form of Amended ACKNOWLEDGMENT OF SERVICE should be detached and completed by a Solicitor acting on behalf of the Defendant or by the Defendant if acting in person. After completion it must be delivered or sent by post to the Registry of the High Court at the following address: —

“LG1, High Court Building, 38 Queensway, Hong Kong.”

2. A Defendant who states in his Amended Acknowledgment of Service that he intends to contest the proceedings MUST ALSO file a DEFENCE which must be written in either the Chinese or the English language with the registry and serve a copy thereof on the Solicitor for the Plaintiff (or on the Plaintiff if acting in person).

If an Amended Statement of Claim is indorsed on the Amended Writ (i.e. the words “Amended Statement of Claim” appear at the top of the back), the Defence must be filed and served within 28 days after the time for acknowledging service of the Amended Writ, unless in the meantime a summons for judgment is served on the Defendant.

If an Amended Statement of Claim is not indorsed on the Amended Writ, the Defence must be filed and served within 28 days after an Amended Statement of Claim has been served on the Defendant. If the Defendant fails to file and serve his defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

The Defendant’s defence must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, you may admit the Plaintiff’s claim in whole or in part by completing Form No. 16 or 16C (as the case may require) accompanying the Amended Writ of Summons.

A completed Form No. 16 or 16C must be filed with the Registry of the High Court and served on the Plaintiff [or the Plaintiff’s Solicitors] within the period for service of the Defence.

4. A Defendant who wishes to dispute the jurisdiction of the Court of First Instance in the proceedings or to argue that the Court of First Instance should not exercise its jurisdiction in the proceedings, and wishes to apply to the Court of First Instance for an order staying the proceedings, must give notice of intention to defend the proceedings and make the application within the time limited for service of a defence.

See attached Notes for Guidance

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Amended Acknowledgment of Service and return it to the Registry of the High Court.

[2. For the purpose of calculating the period of 14 days for acknowledging service, an Amended writ served on the Defendant personally is treated as having been served on the day it was delivered to him and an Amended writ served by post or by insertion through the Defendant's letter box is treated as having been served on the seventh day after the date of posting or insertion.]

(Note: Not applicable if the defendant is a company served at its registered office.)

3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Amended Writ of Summons)".

4. Where the Defendant is a FIRM and a Solicitor is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "partner in the firm of (.....)" after his name.

5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.

6. Where the Defendant is a LIMITED COMPANY the form must be completed by a Solicitor or by someone authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without a Solicitor acting on its behalf.

7. Where the Defendant is a MINOR or a MENTAL Patient, the form must be completed by a Solicitor acting for a guardian ad litem.

8. A Defendant acting in person may obtain help in completing the form at the Registry of the High Court.

9. These notes deal only with the more usual cases. In case of difficulty a Defendant in person should refer to paragraph 8 above.

**IN THE HIGH COURT OF THE
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AND

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BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

AMENDED ACKNOWLEDGMENT OF SERVICE
OF AMENDED WRIT OF SUMMONS

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, THIS FORM MAY HAVE TO BE RETURNED.

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

See Notes 1,
3, 4 and 5.

-
1. State the full name of the Defendant by whom or on whose behalf the service of the Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

-
3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Amended Writ of Summons.

Where words
appear between
square brackets,
delete if
inapplicable

Service of the Amended Writ is acknowledged accordingly.

(Signed) [Solicitor] ()
[Defendant in person]

Address for service

Notes as to Address for Service

Solicitor. Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong.

Defendant in person. Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong, he must give an address in Hong Kong where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.

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3, 4 and 5.

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1. State the full name of the Defendant by whom or on whose behalf the service of the Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

-
3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Amended Writ of Summons.

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Service of the Amended Writ is acknowledged accordingly.

(Signed) [Solicitor] ()
[Defendant in person]

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See Notes 1,
3, 4 and 5.

-
1. State the full name of the Defendant by whom or on whose behalf the service of the Amended Writ is being acknowledged.
-

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

☐ yes

☐ no

See Direction 3.

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

☐ yes

☐ no

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Amended Writ of Summons.

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inapplicable

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(Signed) [Solicitor] ()

[Defendant in person]

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No. 16
Admission (liquidated amount)
(O. 13A rr. 4(2), 5(2) & 13(2))

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7th Defendant

Explanatory Note

1. The only claim the plaintiff has made against you is for a liquidated amount of money. You may admit the plaintiff's claim in whole or in part by completing this form –
 - (a) within the period for service of your defence if you have been served with a writ; *or*
 - (b) the period for filing of your affidavit evidence if you have been served with an originating summons; *or*
 - (c) within 14 days after service of the originating process in any other case.
2. If you have made an admission, you may only be allowed to amend or withdraw your admission if the Court considers it just to do so.
3. If you do not ask for time to pay, the plaintiff will decide how much and when you should pay.
4. If you ask for time to pay, the plaintiff will decide whether or not to accept your proposal for payment.
5. If the plaintiff accepts your proposal for payment, the plaintiff may, within 14 days after the copy of your admission is served on him, request the Court to enter judgment against you.
6. If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
 - (a) the information set out in this form;
 - (b) the reasons why the plaintiff does not accept your proposal for payment; and
 - (c) all other relevant matters.
7. The completed form should be filed in the Registry of the High Court.

How to fill in this form

- Tick the correct boxes and give as much information as you can. **Then sign and date the form.** If necessary provide details on a separate sheet, add the action number and attach it to this form.
- If you do not ask for time to pay, you need not complete items 2 to 9 and 11 to 14.
- If you ask for time to pay, make your offer of payment in item 14.
- If you are not an individual, you need not complete items 1 to 9 but you should complete items 10 to 12 and ensure that you comply with the requirement specified in item 13 and provide sufficient details about the assets and liabilities of your firm, company or corporation to support any offer of payment made in item 14.
- If you are an individual, you need not complete items 10 to 12 and need not comply with the requirement specified in item 13.
- You can get help to complete this form at the Registry of the High Court.

How much of the claim do you admit?

- ☐ I admit the full amount claimed as shown on the statement of claim *or*
- ☐ I admit the amount of \$

1. Personal details

Surname

Forename

☐ Mr

☐ Mrs

☐ Miss

☐ Ms

Address

2. Dependants (*people you look after financially*)

(*give details*)

--

3. Employment

☐ **I am employed as a**

--

My employer is

--

Jobs other than main job
(*give details*)

--

☐ **I am self employed as a**

--

Annual turnover is

\$

☐ **I am not** in arrears with my mandatory provident fund contributions and income tax

☐ **I am** in arrears and I owe

\$

Give details of :

(a) contracts and other work
in hand

--

(b) any sums due for work done

--

☐ **I have been unemployed for**

years

months

--

☐ **I am a pensioner**

4. Bank account and savings (*please list all*)

Bank account	In credit by \$	Overdrawn by \$

I live in ☐ my own flat

☐ my jointly owned flat

☐ public housing estate

☐ rented private flat

☐ others (please specify)

6. Income

My usual take-home pay (including overtime, commission, bonuses, etc.)	\$	per month
My pension(s)	\$	per month
Others living in my home give me	\$	per month
Other income (<i>give details below</i>)		
	\$	per month
	\$	per month
	\$	per month
Total income	\$	per month

7. Other assets *(please list and indicate their location)*

A schematic diagram of a 2D Cartesian coordinate system. The horizontal axis is labeled 'x' and the vertical axis is labeled 'y'. A point is marked with a dot in the first quadrant. A line segment connects the origin (0,0) to this point. The angle between the positive x-axis and this line segment is labeled 'theta'.

8. Expenses

(Do not include any payments made by other members of the household out of their own income)

I have regular expenses as follows:	
Mortgage (<i>including second mortgage</i>)	\$ per month
Rent	\$ per month
Rates and government rent	\$ per month
Management fees	\$ per month
Domestic helper's salary	\$ per month
Gas	\$ per month
Electricity	\$ per month

Water charges	\$	per month
Telephone charges	\$	per month
Housekeeping, food, school meals	\$	per month
Travelling expenses	\$	per month
Children's clothing	\$	per month
Tuition fees	\$	per month
Maintenance payments	\$	per month
Court orders	\$	per month
Others		
	\$	per month
	\$	per month
	\$	per month
Total expenses	\$	per month

9. Liabilities

(This section is for arrears only. Do not include regular expenses listed in item 8.)

Rent arrears	\$
Mortgage arrears	\$
Rates and government rent arrears	\$
Water charges arrears	\$
Fuel debts: Gas	\$
Electricity	\$
Others	\$
Maintenance arrears	\$
Loans and credit card debts (please list)	\$
Others (give details below)	
	\$
	\$
Total liabilities	\$

10. Firm, company or corporation

Name

Address

Tel. no.

11. Assets of firm, company or corporation (please list)

Property, plant and equipment		\$
Inventories		\$
Goodwill and other intangible assets		\$
Loans and receivables		\$
Bank balances and cash		\$
Others		\$
Total		\$

12. Liabilities of firm, company or corporation (please list)

Trade payables		\$
Tax payables		\$
Other payables		\$
Bank loans		\$
Other borrowings		\$
Others		\$
Total		\$

13. Attach to this form a copy of the latest audited profit and loss account and balance sheet of the firm, company or corporation

14. Offer of payment

☐ I can pay the amount admitted on

or

☐ I can pay by [weekly/monthly etc.] installments of

\$

Starting (date)

If you cannot pay immediately, please give brief reasons below :

15. Declaration I _____ declare that the details I have given above and in the attached sheet(s) (if any) are true to the best of my knowledge

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declaration Ordinance (Cap. 11)

Signed

Position or office held
(If signing on behalf of a firm, company or corporation)

With company chop
(if applicable)

Declared at _____ in Hong Kong on _____ of 20 ____.

Before me

[Signature and designation, i.e., Justice of the Peace/Notary Public/Commissioner for Oaths.]

Note — Under section 36 of the Crimes Ordinance (Cap. 200), a person who knowingly and wilfully makes a statement false in a material particular in a declaration or other document which he is authorized or required to make by an enactment is guilty of an offence.

— A defendant who is an individual must sign personally. A director of a company must obtain leave to represent the company from a Practice Master before he may sign on behalf of the company.

— If a plaintiff does not file a request for judgment within 14 days after this form is served on him, his claim is stayed until he files the request.

No. 16C
Admission (unliquidated amount)
(O. 13A rr. 6(2), 7(2) & 13(2))

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

Explanatory Note

1. The only claim the plaintiff has made against you is for an unliquidated amount of money. You may admit the plaintiff's claim in whole or in part by completing this form –
 - (a) within the period for service of your defence if you have been served with a writ; *or*
 - (b) the period for filing of your affidavit evidence if you have been served with an originating summons; *or*
 - (c) within 14 days after service of the originating process in any other case.
2. If you have made an admission, you may only be allowed to amend or withdraw your admission if the Court considers it just to do so.
3. You may offer a specified amount to satisfy the claim. If the amount you offer is accepted by the plaintiff, the plaintiff may request the Court to enter judgment against you for that amount. Alternatively, the plaintiff may request the court to enter judgment against you for an amount to be decided by the Court and costs.
4. You may also ask for time to pay. If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
 - (a) the information set out in this form;
 - (b) the reasons why the plaintiff does not accept your proposal for payment; and
 - (c) all other relevant matters.
5. The completed form should be filed in the Registry of the High Court.

How to fill in this form

- Tick the correct boxes and give as much information as you can. **Then sign and date the form.** If necessary provide details on a separate sheet, add the action number and attach it to this form.
- If you do not ask for time to pay, you need not complete items 2 to 9 and 11 and 12.
- If you are not an individual, you need not complete items 1 to 9 but you should complete items 10 to 12 and ensure that you comply with the requirement specified in item 13 and provide sufficient details about the assets and liabilities of your firm, company or corporation to support any offer of payment made.
- If you are an individual, you need not complete items 10 to 12 and need not comply with the requirement specified in item 13.
- You can get help to complete this form at the Registry of the High Court.

Part A Response to claim (*tick one box only*)

- ☐ I admit liability for the whole claim but want the Court to decide the amount I should pay (if you tick this box, you need not complete Part B and items 2 to 9, 11 and 12 and need not comply with the requirement specified in item 13)

OR

- ☐ I admit liability for the claim and offer to pay in satisfaction of the claim

Part B How are you going to pay the amount you have admitted? (*tick one box only*)

- ☐ I offer to pay on (date)

OR

☐ I cannot pay the amount immediately because (*state reason*)

AND

I offer to pay by instalments of

\$

per(week)(month)
starting (date)

1. Personal details

Surname

Forename

☐ Mr

☐ Mrs

☐ Miss

☐ Ms

Address

2. Dependants (*people you look after financially*)

(*give details*)

3. Employment

☐ I am employed as a

My employer is

Jobs other than main job
(give details)

☐ I am self employed as a

Annual turnover is

\$

☐ I am not in arrears with my mandatory provident fund contributions and income tax

☐ I am in arrears and I owe

Give details of :

(a) contracts and other work in hand

(b) any sums due for work done

☐ I have been unemployed for

☐ I am a pensioner

\$
years months

4. Bank account and savings (please list all)

Bank account	In credit by \$	Overdrawn by \$

5. Residence

I live in ☐ my own flat
☐ my jointly owned flat
☐ public housing estate
☐ rented private flat
☐ others (please specify)

6. Income

My usual take-home pay (including overtime, commission, bonuses etc)	\$	per month
My pension(s)	\$	per month
Others living in my home give me	\$	per month
Other income (<i>give details below</i>)		
	\$	per month
	\$	per month
	\$	per month
Total income	\$	per month

7. Other assets *(please list and indicate their location)*

8. Expenses

(Do not include any payments made by other members of the household out of their own income)

I have regular expenses as follows:

Mortgage (including second mortgage)	\$	per month
Rent	\$	per month
Rates and government rent	\$	per month
Management fees	\$	per month
Domestic helper's salary	\$	per month
Gas	\$	per month
Electricity	\$	per month
Water charges	\$	per month
Telephone charges	\$	per month
Housekeeping, food, school meals	\$	per month
Travelling expenses	\$	per month
Children's clothing	\$	per month
Tuition fees	\$	per month
Maintenance payments	\$	per month
Court orders	\$	per month
Others		
	\$	per month
Total expenses	\$	per month

9. Liabilities

(This section is for arrears only. Do not include regular expenses listed in item 8.)

Rent arrears	\$
Mortgage arrears	\$
Rates and government rent arrears	\$
Water charges arrears	\$
Fuel debts : Gas	\$
Electricity	\$
Others	\$
Maintenance arrears	\$
Loans and credit card debts (please list)	\$
	\$
	\$
Others (give details below)\$	
	\$
	\$
Total liabilities	\$

10. Firm, company or corporation

Name	
Address	
Tel. no.	

11. Assets of firm, company or corporation (please list)

Property, plant and equipment		\$
Inventories		\$
Goodwill and other intangible assets		\$
Loans and receivables		\$
Bank balances and cash		\$
Others		\$
Total		\$

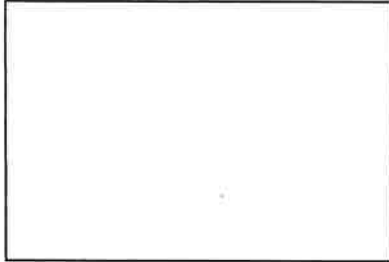
12. Liabilities of firm, company or corporation (please list)

Trade payables		\$
Tax payables		\$
Other payables		\$
Bank loans		\$
Other borrowings		\$
Others		\$
Total		\$

13. Attach to this form a copy of the latest audited profit and loss account and balance sheet of the firm, company or corporation.

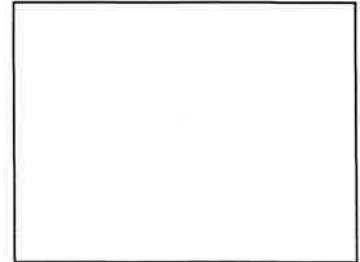
14. Declaration I _____ declare that the details I have given above and in the attached sheet(s) (if any) are true to the best of my knowledge
And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declaration Ordinance (Cap. 11)

Signed



Position or office held
(If signing on behalf of
a firm, company or
corporation)

With company chop
(if applicable)



Declared at _____ in Hong Kong on _____ of 20 ____.

Before me

[Signature and designation, i.e.,
Justice of the Peace/Notary
Public/Commissioner for Oaths.]

Note – Under section 36 of the Crimes Ordinance (Cap. 200), a person who knowingly and wilfully makes a statement false in a material particular in a declaration or other document which he is authorized or required to make by an enactment is guilty of an offence.

- A defendant who is an individual must sign personally. A director of a company must obtain leave to represent the company from a Practice Master before he may sign on behalf of the company.
- If a plaintiff does not file a request for judgment within 14 days after this form is served on him, his claim is stayed until he files the request.

申索性質:

A. * 金錢申索/非金錢申索/混合申索

B. 信託

表格 1

經修訂的 傳訊令狀

(第 6 號命令第 1 條規則)

HCA 625 / 2025

香港特別行政區

高等法院

原訟法庭

高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

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

第一被告人

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

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

致第一被告人 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 of unknown address

致第二被告人 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 of unknown address

致第三被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE COINBASE.COM of unknown address

致第四被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE OKX.COM of unknown address

致第五被告人 PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES OR OTHER ENTITIES THAT OPERATE GEMINI.COM of unknown address

致第六被告人 BITCOINFORME S.L. TRADING AS BIT2ME of Calle Germán Bernacer, 69, 03203, Elche, Alicante, Spain of unknown address

致第七被告人 PERSON(S) UNKNOWN CATEGORY A of unknown address

本經修訂的傳訊令狀已由上述原告人就背頁所列出的申索而針對你發出。

在本經修訂的令狀送達你後(14 天)內(送達之日計算在內)，你必須了結該申索或將隨附的經修訂的送達認收書交回高等法院登記處，並在經修訂的認收書中述明你是否擬就本法律程序提出爭議或作出承認。

如你沒有在上述時限內了結該申索或交回送達經修訂的認收書，或如你交回送達經修訂的認收書但沒有在經修訂的認收書中述明擬就本法律程序提出爭議或作出承認，則原告人可繼續進行訴訟，而判你敗訴的判決可隨即在無進一步通知發出的情況下予以登錄。

*[你如擬作出承認，可按照隨附的關於送達經修訂的認收書的指示，填寫適當的附上的表格。]

本令狀於今天，即 2025 年 3 月 28 日由高等法院登記處發出。

司法常務官

備註：一本令狀除非經由法庭命令予以續期，否則不得在發出日期起計 12 個公曆月之後送達。

重要事項

關於送達經修訂的認收書的指示載於隨附的表格。

經修訂的傳訊令狀送達認收書

(第 12 號命令第 3 條規則)

關於送達經修訂的認收書的指示

1. 隨附的送達經修訂的認收書表格應由代表被告人行事的律師撕下及填寫，或如被告人是親自行事，則應由被告人撕下及填寫。表格填妥後必須交付或以郵遞方式送交高等法院登記處，登記處的地址是：—

香港金鐘道 38 號高等法院低層 1 樓

2. 被告人如在其送達經修訂的認收書中表示擬就法律程序提出爭議，則必須亦將一份抗辯書送交高等法院登記處存檔，該份抗辯書必須以中文或英文寫成，其文本並必須送達原告人的代表律師(或如原告人是親自行事，則送達原告人)。

如經修訂的令狀註有經修訂的申索陳述書(即在背頁上端出現“經修訂的申索陳述書”等字)，則除非在對經修訂的令狀作認收送達的時限後 28 天內有要求作判決的傳票送達被告人，否則必須在該段時限內將抗辯書送交存檔及送達。

經修訂的令狀並無註有經修訂的申索陳述書，則必須在經修訂的申索陳述書送達被告人後 28 天內將抗辯書送交存檔及送達。

如被告人沒有在適當時限內將其抗辯書送交存檔及送達，則原告人可不發出進一步通知而登錄判被告人敗訴的判決。

被告人的抗辯書必須按照《高等法院規則》(第 4 章，附屬法例 A) 第 41A 號命令，以屬實申述核實。

3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，你可藉填寫隨附於經修訂的傳訊令狀的表格 16 或 16C (視乎情況所需)，承認原告人的整項申索或其部分。

填妥的表格 16 或 16C 必須在送達抗辯書的限期內，送交高等法院登記處存檔，並送達原告人[或原告人的律師]。

4. 被告人如意欲對原訟法庭在法律程序中的司法管轄權提出爭議，或意欲辯稱原訟法庭不應在有關法律程序中行使其司法管轄權，並意欲向原訟法庭提出申請，要求作出擱置法律程序的命令，必須就法律程序發出擬抗辯通知書，並必須在送達抗辯書的時限內提出申請。

見隨附的填寫指引

填寫指引

1. 每一名被告人(如被告人多於一名)均須填寫一份經修訂的送達認收書，並將之交回高等法院登記處。

[2. 為計算作認收送達的 14 天期限，面交送達被告人的經修訂的令狀視作已在其交付被告人之日送達，而以郵遞或投入被告人信箱的方式送達的令狀，則視作已在投寄或投入被告人信箱之日後第七天送達。]

(備註：如被告人是一間公司而經修訂的令狀是在該公司的註冊辦事處送達，則此條並不適用。)

3. 凡被告人是以有別於其本身姓名或名稱的姓名或名稱被起訴，表格必須由他填寫，並須在第 1 段中加上“以經修訂的傳訊令狀所述明的姓名或名稱)之名被起訴”等字。

4. 凡被告人是一間商號，且並沒有指示律師代為行事，表格必須由一名合夥人以其姓名或名稱填寫，並須在第 1 段中在其姓名或名稱之後加上“(.....)商號的合夥人”的描述。

5. 凡被告人是以個人身分以其本身姓名以外的名稱營業而被起訴，表格必須由他填寫，並須在第 1 段中在其姓名之後加上“以(.....)之名營業”的描述。

6. 凡被告人是一間有限公司，表格必須由律師或獲授權代該公司行事的人填寫，但該公司如無律師代表行事，則不得在法律程序中採取進一步的步驟。

7. 凡被告人是未成年人或精神病人，表格必須由辯護監護人的代表律師填寫。

8. 親自行事的被告人可在高等法院登記處獲取協助填寫表格。

9. 本填寫指引只適用於比較普通的案件，親自行事的被告人如有困難應參閱上文第 8 段。

香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

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

第一被告人

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

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

經修訂的傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引 1、3、4 及 5。 1. 述明對經修訂的令狀作認收送達或由他人代為對經修訂的令狀作認收送達的被告人的全名。

2. 述明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“✓”號)

☐ 是

☐ 否

見指示 3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，述明被告人是否擬作出承認。
(在適用的方格內加上“✓”號)。

☐ 是

☐ 否

如擬作出承認，被告人可藉填寫隨附於經修訂的傳訊令狀的表格 16 或 16C (視乎情況所需) 而作出承認。

方括號內字句
如不適用請予
刪去。

本人據此對經修訂的令狀作認收送達。

(簽署) [律師] ()

[無律師代表的被告人]

送達地址

關於送達地址的備註

律師：凡被告人是由律師代表，述明該律師在香港的營業地點。

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香港特別行政區
高等法院
原訟法庭
高院民事訴訟 2025 年第 625 號

YAN YU YING (忻汝英)

原告人

及

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

第一被告人

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

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR COMPANIES
OR OTHER ENTITIES THAT OPERATE GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

經修訂的傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引 1、3、4 及 5。 1. 述明對經修訂的令狀作認收送達或由他人代為對經修訂的令狀作認收送達的被告人的全名。

2. 述明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“✓”號)

☐ 是

☐ 否

見指示 3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，述明被告人是否擬作出承認。
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見指引1、3、4及5。 1. 述明對經修訂的令狀作認收送達或由他人代為對經修訂的令狀作認收送達的被告人的全名。

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第七被告人

註釋

1. 原告人針對你而提出的唯一申索，是經算定款項。你可在下述限期內，藉填寫本表格而承認原告人的整項申索或其部分 —
 - (a) (如你已獲送達令狀) 送達抗辯書的限期；或
 - (b) (如你已獲送達原訴傳票) 將你的誓章證據送交存檔的限期；或
 - (c) (在任何其他情況下) 送達原訴法律程序文件後 14 天。
2. 如你已作出承認，你僅會在法庭認為容許你修訂或撤回你的承認屬公正的情況下，獲容許修訂或撤回你的承認。
3. 如你不要求給予時間以作付款，原告人會決定你應支付的款額，以及你應在何時付款。
4. 如你要求給予時間以作付款，原告人會決定是否接受你的付款建議。
5. 如原告人接受你的付款建議，原告人可在你的承認的文本送達他後 14 天內，請求法庭登錄判你敗訴的判決。
6. 如原告人不接受你的付款建議，法庭在考慮下述事宜後，會決定應如何作出付款 —
 - (a) 本表格列出的資料；
 - (b) 原告人不接受你的付款建議的原因；及
 - (c) 所有其他有關事宜。
7. 已填妥的表格應送交高等法院登記處存檔。

如何填寫本表格

- 在正確的方格內加上“✓”號，並盡可能提供最詳盡的資料。然後在表格上簽署和註明日期。如有需要，可另紙提供詳細資料，加上有關訴訟編號，並將其夾附於本表格。
- 如你不要求給予時間以作付款，則不必填寫第 2 至 9 項以及第 11 至 14 項。
- 如你要求給予時間以作付款，可在第 14 項中作出你的付款提議
- 如你並非個人，則不必填寫第 1 至 9 項，但你應填寫第 10 至 12 項，並確保你遵守第 13 項指明的規定，以及就你的商號、公司或法團的資產及負債提供足夠的詳細資料，以支持在第 14 項中作出的任何付款提議。
- 如你是個人，則不必填寫第 10 至 12 項，亦不必遵守第 13 項指明的規定。
- 你可在高等法院登記處，得到關於填寫本表格的協助

你承認多少的申索款額？

☐ 本人承認申索陳述書所顯示全部申索款額或

☐ 本人承認的款額為 \$

1. 個人詳細資料

姓

名

☐ 先生 ☐ 夫人 ☐ 小姐 ☐ 女士

地址

2. 受養人 (接受你財政照顧的人)

(提供詳細資料)

3. 受僱情況

☐ 本人受僱為

本人的僱主為

主要工作以外的工作
(提供詳細資料)

☐ 本人自僱從事

每年營業額為

\$

☐ 本人並無拖欠本人的強制性公積金供款及入息稅

☐ 本人有拖欠款項，
所欠款額為

\$

提供以下項目的詳細
資料：

(a) 手上的合約及其他
工作

(b) 已進行工作的任何
未付款項

☐ 本人已失業，為期

年

個月

☐ 本人為領取退休金的人

4. 銀行帳戶及儲蓄 (請全數列出)

銀行帳戶	貸項款額 \$	透支款額 \$

5. 居所

- 本人居於
- ☐ 自置居住單位
 - ☐ 本人的聯名擁有居住單位
 - ☐ 公共屋邨
 - ☐ 租住私人單位
 - ☐ 其他 (請指明)

6. 入息

本人通常的實得收入(包括超時收入、佣金、花紅等)	每月\$
本人的退休金	每月\$
居於本人家中的其他人給本人的款項	每月\$
其他入息(在下面提供詳細資料)	
	每月\$
	每月\$
	每月\$
總入息	每月\$

7. 其他資產 (請列出和示明其所在)

--

8. 開支

(請勿包括住戶中其他成員自其本身入息作出的任何付款)

本人有以下定期開支：	
按揭 (包括第二按揭)	每月\$
租金	每月\$
差餉及地租	每月\$
管理費	每月\$
家庭傭工薪金	每月\$
石油氣／煤氣費	每月\$
電費	每月\$
水費	每月\$
電話費	每月\$
家務開支、食物、學校膳食	每月\$
交通費	每月\$
子女衣服	每月\$
學費及補習費	每月\$
贍養費	每月\$
法庭命令	每月\$
其他	
	每月\$
總開支	每月\$

9. 負債

(本項僅供填寫欠款。請勿包括第 8 項中列出的定期開支。)

租金欠款	\$
按揭欠款	\$
差餉及地租欠款	\$
水費欠款	\$
燃料債項：石油氣／煤氣費	\$
電費	\$
其他	\$
贍養費欠款	\$
貸款及信用卡債項 (請列出)	\$
	\$
其他 (在下面提供詳細資料)	
	\$
	\$
總負債	\$

10. 商號、公司或法團

名稱

地址

電話號碼

11. 商號、公司或法團資產(請列出)

財產、裝置及設備		\$
備庫存資產		\$
商譽及其他無形資產		\$
貸款及應收款項		\$
銀行結餘及現金		\$
其他		\$
總額		\$

12. 商號、公司或法團負債(請列出)

營業應繳款項		\$
應繳稅項		\$
其他應繳款項		\$
銀行貸款		\$
其他借款		\$
其他		\$
總額		\$

13. 將商號、公司或法團最近期的經審計的損益表及資產負債表副本夾附於本表格

14. 付款提議

☐ 本人能夠在以下日期支付已承認的款額

或

☐ 本人能夠分期每[週/月等]支付

\$

由 (日期)開始

如你不能即時付款，請在下面簡述理由：

15. 聲明 本人_____聲明：盡本人所知，本人在以上各段及在附頁(如有的話)中提供的詳細資料，均屬事實

本人謹憑藉《宣誓及聲明條例》(第 11 章)衷誠作出此項鄭重聲明，並確信其為真確無訛

簽署

職銜或所擔任
的職位
(如代表商號、
公司或法團
簽署)

連同公司圖章
(如適用的話)

此項聲明是於 20____年____月____日在香港____作出。

在本人面前作出

[簽署及職銜，即：太平紳士/公證人/監誓員。]

附註 — 根據《刑事罪行條例》(第 200 章)第 36 條，任何人明知而故意在任何成文法則授權他或規定他作出的聲明或其他文件中，作出在要項上屬虛假的陳述，即屬犯罪。

— 屬個人的被告人必須由個人親身簽署。公司的董事必須事先取得常規聆案官的許可，方可代公司簽署。

— 如原告人沒有在本表格送達他後 14 天內，將要求判決的請求送交存檔，其中索須予擱置，直至他將該請求送交存檔為止。

表格 16C
承認(未經算定款額)
(第 13A 號命令第 6(2)、7(2)及 13(2)條規則)

HCA 625 / 2025

香港特別行政區
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 - (b) (如你已獲送達原訴傳票) 將你的誓章證據送交存檔的期限；或
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3. 你可提議一個指明的款額以了結申索。如你提議的款額獲原告人接受，則原告人可請求法庭登錄判你須支付該款額的判決。另一做法是原告人可請求法庭登錄判你須支付有待法庭決定的款額以及訟費的判決。
4. 你亦可要求給予時間以作付款。如原告人不接受你的付款建議，法庭在考慮下述事宜後，會決定應如何作出付款 —
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- 如你並非個人，則不必填寫第 1 至 9 項，但你應填寫第 10 至 12 項，並確保你遵守第 13 項指明的規定，以及就你的商號、公司或法團的資產及負債提供足夠的詳細資料，以支持所作出的任何付款提議。
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- 你可在高等法院登記處，得到關於填寫本表格的協助。

A 部對申索的回應(僅在一個方格內加上“✓”號)

- ☐ 本人承認整項申索的法律責任，但希望法庭決定本人應支付的款額(如你在本方格內加上“✓”號，則不必填寫 B 部及第 2 至 9 項、第 11 及 12 項，亦不必遵守第 13 項指明的規定)

或

- ☐ 本人承認申索的法律責任，並提議支付 以了結申索

B 部 你將如何支付已承認的款額?(僅在一個方格內加上“✓”號)

- ☐ 本人提議在(日期) 付款

或

- ☐ 本人不能即時付款，理由是(述明理由)

及

本人提議分期付款，\$ 並由 開始
每(星期)(月)支付 (日期) 付款

1. 個人詳細資料

姓

名

☐ 先生 ☐ 夫人 ☐ 小姐 ☐ 女士

地址

2. 受養人(接受你財政照顧的人)

(提供詳細資料)

3. 受僱情況

☐ 本人受僱為

本人的僱主為

主要工作以外的工作
(提供詳細資料)

☐ 本人自僱從事

每年營業額為

\$

☐ 本人並無拖欠本人的強制性公積金供款及入息稅

☐ 本人有拖欠款項，
所欠款額為

\$

提供以下項目的詳細
資料:

(a) 手上的合約及
其他工作

(b) 已進行工作的任何
未付款項

☐ 本人已失業，為期

年

個月

☐ 本人為領取退休金的人

4. 銀行帳戶及儲蓄 (請全數列出)

銀行帳戶	貸項款額 \$	透支款額 \$

5. 居所

- 本人居於 ☐ 自置居住單位
☐ 本人的聯名擁有居住單位
☐ 公共屋邨
☐ 租住私人單位
☐ 其他(請指明)

6. 入息

本人通常的實得收入(包括超時收入、佣金、花紅等)	每月 \$
本人的退休金	每月 \$
居於本人家中的其他人給本人的款項	每月 \$
其他入息(在下面提供詳細資料)	
	每月 \$
	每月 \$
	每月 \$
總入息	每月 \$

7. 其他資產 (請列出和示明其所在)

--

8. 開支

(請勿包括住戶中其他成員自其本身入息作出的任何付款)

本人有以下定期開支:	
按揭 (包括第二按揭)	每月 \$
租金	每月 \$
差餉及地租	每月 \$
管理費	每月 \$
家庭傭工薪金	每月 \$
石油氣／煤氣費	每月 \$
電費	每月 \$
水費	每月 \$
電話費	每月 \$
家務開支、食物、學校膳食	每月 \$
交通費	每月 \$
子女衣服	每月 \$
學費及補習費	每月 \$
贍養費	每月 \$
法院命令	每月 \$
其他	每月 \$
總開支	每月 \$

9. 負債

(本項僅供填寫欠款。請勿包括第 8 項中列出的定期開支。)

租金欠款	\$
按揭欠款	\$
差餉及地租欠款	\$
水費欠款	\$
燃料債項：石油氣／煤氣費	\$
電費	\$
其他	\$
贍養費欠款	\$
貸款及信用卡債項(請列出)	\$
其他(在下面提供詳細資料)	
	\$
總負債	\$

10. 商號、公司或法團

名稱

地址

電話號碼

11. 商號、公司或法團資產 (請列出)

財產、裝置及設備		\$
庫存資產		\$
商譽及其他無形資產		\$
貸款及應收款項		\$
銀行結餘及現金		\$
其他		\$
總額		\$

12. 商號、公司或法團負債 (請列出)

營業應繳款項		\$
應繳稅項		\$
其他應繳款項		\$
銀行貸款		\$
其他借款		\$
其他		\$
總額		\$

13. 將商號、公司或法團最近期的經審計的損益表及資產負債表副本夾附於本表格

14. 聲明 本人_____聲明：盡本人所知，本人在以上各段及在附頁(如有的話)中提供的詳細資料，均屬事實

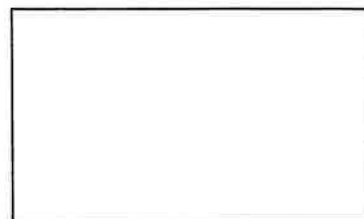
本人謹憑藉《宣誓及聲明條例》(第 11 章)衷誠作出此項鄭重聲明，並確信其為真確無訛

簽署



職銜或所擔任的
職位

(如代表商號、
公司或法團簽署)



連同公司圖章
(如適用的話)

此項聲明是於 20____年____月____日在香港_____作出。

在本人面前作出

[簽署及職銜，即：太平紳士/公證人/監誓員。]

附註 — 根據《刑事罪行條例》(第 200 章)第 36 條，任何人明知而故意在任何成文法則授權他或規定他作出的聲明或其他文件中，作出在要項上屬虛假的陳述，即屬犯罪。

- 屬個人的被告人必須由個人親身簽署。公司的董事必須事先取得常規聆案官的許可，方可代公司簽署。
- 如原告人沒有在本表格送達他後 14 天內，將要求判決的請求送交存檔，其中索須予擱置，直至他將該請求送交存檔為止。

(注意：請以英文本為準)

* 方括號內字句如不適用請予刪去。

* (如註有申索陳述書，請簽署。)

經修訂的申索陳述書必須按照《高等法院規則》(第 4 章，附屬法例 A) 第 41A 號命令，以屬實申述核實。

(凡原告人只就一筆債項或經算定的索求款項提出申索：如在交回送達經修訂的認收書的時限內，被告人支付所申索的款額以及 \$_____ 作為訟費，則進一步的法律程序會被擱置。該筆款項必須付給原告人或其律師。)

本經修訂的令狀是由代表上述原告人的殷國榮律師行發出，其地址為香港中環德輔道中 54-58 號 11 樓 1101 室，而該原告人的地址則為 Flat A, 8th Floor, Block 3, Imperial Cullinan, 10 Hoi Fai Road, Tai Kok Tsui, Kowloon, Hong Kong。

*(或凡原告人是親自起訴者。)

本經修訂的令狀是由上述原告人發出，該原告人居於 _____ 及(如原告人並非居於本司法管轄權範圍內)其送達地址為 _____)。

(以下部分及首頁的[申索性質]部分並非表格 1 的部分)

有關屬實申述的格式，請參閱《高等法院規則》(第 4 章，附屬法例 A) 第 41 號命令第 5(1)條規則的規定。舉例如下：

“本人/原告人相信本申索陳述書所述事實屬實。”

香港特別行政區
高等法院
原訟法庭
高 院 民 事 訴 訟 2025 年 第 625 號

BETWEEN

YAN YU YING (忻汝英)

原告人

及

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

第一被告人

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

第二被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
OMPANIES OR OTHER ENTITIES THAT OPERATE
COINBASE.COM

第三被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
OKX.COM

第四被告人

PERSONS UNKNOWN BEING THE INDIVIDUALS OR
COMPANIES OR OTHER ENTITIES THAT OPERATE
GEMINI.COM

第五被告人

BITCOINFORME S.L. TRADING AS BIT2ME

第六被告人

PERSON(S) UNKNOWN CATEGORY A

第七被告人

經修訂的傳訊令

發出日期: 2025 年 3 月 28 日

送交存檔日期: 2025 年 3 月 28 日

送交存檔日期: 2025 年 月 日

原告人代表律師
殷國榮律師行
香港中環德輔道中 54-58 號 11 樓 1101 室
電話 : 2815 5116 傳真 : 2815 5269
檔案編號 : Y2251839

Where words appear between square brackets delete if inapplicable.
*(Signed if statement of claim indorsed.)

An Amended statement of claim must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

(Where the Plaintiff's claim is for a debt or liquidated demand only: If, within the time for returning the Amended Acknowledgment of Service, the Defendant pays the amount claimed and \$ _____ for costs, further proceedings will be stayed. The money must be paid to the Plaintiff or his Solicitor.)

THIS AMENDED WRIT was issued by Messrs. Edwin Yun & Co., of Room 1101, 11th Floor, Nos.54-58 Des Voeux Road Central, Hong Kong, Solicitors for the said Plaintiff of Flat A, 8th Floor, Block 3, Imperial Cullinan, 10 Hoi Fai Road, Tai Kok Tsui, Kowloon, Hong Kong.

(Sd.) Edwin Yun & Co.
~~EDWIN YUN & CO.~~
~~Solicitors for the Plaintiff~~

EDWIN YUN & CO.
Solicitors for the Plaintiff

*(or where the Plaintiff sues in person:

THIS AMENDED WRIT was issued by the said Plaintiff who resides at

and (if the Plaintiff does not reside within the jurisdiction) whose address for service is _____

(This footnote and the claim nature box at the front page do not form part of the statutory Form No. 1)
Please refer to Order 41A rule 5 (1) of the Rules of the High Court, Cap.4A for the form of the statement of truth.
Example is given below:

*I / The plaintiff believe(s) that the facts stated in this statement of claim are true."

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

AMENDED WRIT OF SUMMONS

Issued on the 28th day of March 2025

~~Filed on the 28th day of March 2025~~

Filed on the day of July 2025

Messrs. 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

Amended as in red this day of
pursuant to the Order made
by dated

Registrar

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

DRAFT AMENDED STATEMENT OF CLAIM

A. The parties

1. The Plaintiff is a victim of Bitcoin theft.
2. The 1st Defendant(s) is/are the persons unknown who received cryptocurrency originating from the following Bitcoin addresses up to 26 March 2025:-
 - 2.1. around 300 in address 32stz4yrsBHDJp3WMXN3U4KK3BZUH3wckw
 - 2.2. around 38 in address 3BGJuYeHak3WhSjSrKNz25XJnE23dFiQam
 - 2.3. around 23 in address 39Hb58CkPY9iLQVf8893bJJeuFGt7hwUDu

(“361 Bitcoins”) (“Subject Addresses”)

3. The 2nd to 6th Defendants are entities operating various cryptocurrency exchanges identified by an investigator, Mr Umberto BUONORA of Recoveris.io in a report entitled “*Forensic Memo on Fraud Incident*” dated 24 March 2025 (“**Report**”),

3.1. The 2nd Defendant is/are the entity/entities operating the “*Binance*” cryptocurrency exchange.

3.2. The 3rd Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.coinbase.com/>.

3.3. The 4th Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.okx.com/>.

3.4. The 5th Defendant is/are the entity/entities operating a cryptocurrency exchange at <https://www.gemini.com/>.

3.5. The 6th Defendant is a company incorporated in Spain, identified on the website <https://bit2me.com/> as the operator of the cryptocurrency exchange at <https://bit2me.com/>.

3A. The 7th Defendant(s) is/are the person(s) unknown who own or operate the cryptocurrency addresses “0x16e4c3721d65701542ff5ae4c959fcebcd9fe2b”, “0xbf91ca583ec6b3b37560b3781f2810965184ddd6”, and “0x5a709e0f5f508fbb56c333589d5dda835b1a61c1”, which are associated with the 2nd Defendant (“the D7 Addresses”).

B. The theft of the Plaintiff's Bitcoins

4. The Plaintiff is the plaintiff in High Court Action Number 2295 of 2019, where her case is that Mr LEUNG Wing Hei (“**Mr Leung**”) (the defendant in that case) has stolen around 1,000 Bitcoins from her in 2018 (“**1,000 Bitcoins**”).
5. In 2022, the Hong Kong Court of First Instance ordered Mr Leung not to dispose of around 364.46378963 Bitcoins that he still held from the 1,000 Bitcoins (“**HCA 2295 of 2019 Injunction**”).
6. Prior to 12 March 2025, of the around 364.46378963 Bitcoins, around 361 Bitcoins were held in the Subject Addresses.
7. On 12 March 2025, the around 361 Bitcoins were transferred to and therefore stolen by the 1st Defendant.
8. The 1st and 7th Defendants knew or ought to have known that the 361 Bitcoins and their traceable proceeds belonged to the Plaintiff at all material times.

Particulars of the 1st and 7th Defendant's Knowledge

- 8.1. The 361 Bitcoins were subject to HCA 2295 of 2019 Injunction.
- 8.2. The Plaintiff did not authorise these transfers.
- 8.3. There was no commercial or other logic behind the rapid transfers of the 361 Bitcoins as disclosed by the “*complex and vast layering scheme*” involving around 365 identifiable transfers within around 8 days.
- 8.4. Most of the 361 Bitcoins were swapped for other cryptocurrency to conceal the unauthorised transfers and dissipation.

9. Mr Leung denies knowledge or responsibility for these transfers, and the identity of the 1st Defendant remains unknown.

10. After the discovery of the 1st Defendant's theft, the Plaintiff instructed investigators to investigate the recipients of the 361 Bitcoins.

11. On 24 March 2025, the Plaintiff received the Report which shows that:-

11.1. a "*complex and vast layering scheme*" had taken place involving around 365 identifiable transfers within around 8 days on an initial investigation.

11.2. parts of the 361 Bitcoins were transferred to deposit addresses and/or user accounts associated with the 2nd, 3rd, 4th, 5th and 6th Defendants, who are centralised cryptocurrency exchanges with Know Your Customer policies.

11A. On 23 July 2025, the Plaintiff received a report from Bitrace Limited which shows that:

11A.1 most of the 361 Bitcoins were swapped for Ethereum Tokens and were transferred on the Ethereum blockchain.

11A.2 around 54.5% of the 361 Bitcoins were transferred to the D7 Addresses.

12. It follows that the 2nd, 3rd, 4th, 5th and 6th Defendants hold information pertaining to the identity of the 1st Defendant by virtue of their Know Your Customer policies.

13. Investigations are ongoing, and the Plaintiff will apply to join additional parties if necessary. The Plaintiff also reserves her right to plead further particulars upon discovery and/or interrogatories.

14. Purely as a reference, the value of one Bitcoin as at the date of this Statement of Claim is approximately HK\$749,151, at which the 361 Bitcoins would be worth approximately HK\$270,443,511.
15. The Plaintiff suffered loss and seeks recovery of the 361 Bitcoins. Against the 1st and 7th Defendants, the Plaintiff will rely on fraud, conversion, misuse of private information, unjust enrichment, monies had and received, constructive trust, knowing receipt, dishonest assistance and equity to seek recovery of the 361 Bitcoins, ~~and~~ their traceable proceeds, damages and/or equitable compensation.
16. As against the 2nd to 6th Defendants, the Plaintiff seeks disclosure of information to enable the Plaintiff to identify and recover from the 1st and 7th Defendants.

AND THE PLAINTIFF CLAIMS AGAINST THE DEFENDANTS:

- (1) A declaration that
 - (a) the Plaintiff was at all material times and remains the beneficial owner of the 361 Bitcoins and/or their traceable proceeds; and
 - (b) The 1st Defendant holds the 361 Bitcoins and/or their traceable proceeds on trust for the Plaintiff.

AND THE PLAINTIFF CLAIMS AGAINST THE 1st AND 7TH DEFENDANTS:

- (2) An order that the 1st and 7th Defendants do deliver up the 361 Bitcoins and/or their traceable proceeds to the Plaintiff.

- (3) All necessary consequential or further accounts, inquiries or orders to enable the Plaintiff to trace and recover the 361 Bitcoins and/or their traceable proceeds.
- (4) Damages or equitable compensation to be assessed.
- (5) Interest on any sum ordered to be paid at such rate and for such period as this Honourable Court deems just pursuant to Sections 48 and 49 of the High Court Ordinance or pursuant to the Court's equitable jurisdiction.
- (6) Further and other relief.
- (7) Costs.

AND THE PLAINTIFF CLAIMS AGAINST THE 2ND TO 6TH DEFENDANTS:

- (8) An order that the 2nd to 6th Defendant disclose to the Plaintiff:
 - (a) The full name(s), address, particulars, email address(es), IP address(es) and a full set of Know Your Client documents of the client account(s) associated with the addresses and transactions identified in the Report defined above and exhibited to the First Affirmation of Chow Kam Pui ("**Client Account(s)**") and the D7 Addresses.
 - (b) The account balance as at the date of the Order, and the complete transaction log of the Client Account(s), including but not limited to the fiat and/or cryptocurrency deposits and withdrawals for the period starting from 12 March 2025 13:50 UTC.

(c) Any bank accounts associated with the Client Accounts known to the Defendant,
including the name and address of the relevant bank.

~~Dated 1 May 2025~~

~~JASPER WONG~~

~~Counsel for the Plaintiff~~

(Sd.) Edwin Yun & Co.

~~EDWIN YUN & CO~~

~~Solicitors for the Plaintiff~~

Dated July 2025

JUSTIN W.T. LAM

Counsel for the Plaintiff

EDWIN YUN & CO

Solicitors for the Plaintiff

STATEMENT OF TRUTH

~~I, YAN YU YING, the Plaintiff, believes that the facts stated in this Statement of Claims are true.~~

~~本人，忻汝英，原告人，真誠相信上述所述的事實為真實。~~

~~Dated this 12th day of May, 2025.~~

~~日期：2025 年 5 月 12 日~~

(Sd.) Yan Yu Ying

YAN YU YING

STATEMENT OF TRUTH

I, YAN YU YING, the Plaintiff, believes that the facts stated in this Amended Statement of Claim are true.

本人，忻汝英，原告人，真誠相信上述所述的事實為真實。

Dated this day of , 2025.

日期：2025 年 月 日

YAN YU YING

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

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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

AMENDED STATEMENT OF CLAIM

~~Filed on : 20th May, 2025~~

Filed on

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

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

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UP TO 26 MARCH 2025

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BITCOINFORME S.L. TRADING AS BIT2ME

6th Defendant

PERSON(S) UNKNOWN CATEGORY A

7th Defendant

**INJUNCTION PROHIBITING
DISPOSAL OF ASSETS WORLDWIDE AND IN HONG KONG
AGAINST THE 7TH DEFENDANT**

PENAL NOTICE

TAKE NOTICE THAT if you, being the within-named Defendant disobey or neglect to obey or comply with this Order, 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 to Court and may be sent to prison or fined.

Dated the 30th day of July 2025

Edwin Yun & Co

Solicitors for the Plaintiff

刑罰通知

如你，上述被告人，忽略服從或遵從下文闡述的命令，可被判藐視法庭，並可被判監禁或罰款，或可因應執执行程序以強迫你遵守有關命令。任何人士協助任何上述被告人違反下文闡述的命令，也可被判藐視法庭，並可被判監禁或罰款。

2025 年 7 月 30 日

殷國榮律師行

原告人的代表律師行

IMPORTANT NOTICE TO THE DEFENDANT

- (1) This Order prohibits you from dealing with your assets described below. This Order is subject to the exceptions which are set out herein below. You should read the whole of this document carefully. You are advised to consult a lawyer as soon as possible. You have the right to ask the Court to vary or discharge this Order.
- (2) If you disobey this Order you may be found guilty of contempt of Court and you may be sent to prison or fined or your assets may be seized.

BEFORE THE HONOURABLE MR. JUSTICE LOK IN CHAMBERS

(NOT OPEN TO PUBLIC)

ORDER

An application was made on 30 July 2025 by counsel for Ms YAN Yu Ying, the Plaintiff, to the Judge who read the draft amended writ, the draft amended statement of claim and the affirmations listed in Schedule 1 and accepted the undertakings in Schedule 2 at the end of this Order.

After hearing the application the Judge made the following Order.

IT IS ORDERED that:

Restriction on disposal of certain Bitcoins and their traceable proceeds

1. The 7th Defendant must not dispose of or deal with any of the around 360.97176374 BTC (“**361 Bitcoins**”) originating from the Subject Addresses as defined at Paragraph 4 of the Indorsement of Claim or their traceable proceeds.
2. The 7th Defendant may deal with or dispose of the 361 Bitcoins or their traceable proceeds that remain in his possession, custody and control (a) upon prior agreement in writing from the Plaintiff’s solicitors, or (b) provided that the following conditions are met:
 - 2.1. an outright sale is made in return for a widely circulated legal tender (e.g. HK\$, RMB, and US\$) at the then market price for Bitcoins (or other cryptocurrency as the case may be);
 - 2.2. the proceeds of sale are deposited into a bank account maintained with a bank in Hong Kong;

- 2.3. the Plaintiff is informed of the sale, the date, the amount, and the bank account by affidavit or solicitors' letter within 3 days of the sale;
- 2.4. the Defendant does not deal with the proceeds of sale without the prior agreement in writing from the Plaintiff's solicitors.

Self-identification order

3. The 7th Defendant must disclose (by way of affidavit within 14 days of the service of this Order) to the Plaintiff his name and address for service.

Disclosure of information regarding the 361 Bitcoins or their traceable proceeds

4. The 7th Defendant must disclose (by way of affidavit within 14 days of the service of this Order) the details of the 361 Bitcoins or traceable proceeds in their possession, including
 - 4.1. For any cryptocurrency on the public blockchain, their public address and the exchange at which such cryptocurrency are held.
 - 4.2. For any legal tender, the name and address of the bank (or any other institution) in which the legal tender are held.
 - 4.3. For any other kind of property, the nature of the property, the name of the property, and its address.
 - 4.4. Regardless of the nature of the property, the name and address of any custodian of the property, how the custodian exercises control over the property, any register (e.g. Land Registry) on which records of the property appears, and the address for service of such custodian.

Restriction on disposal of assets

5. (1) The 7th Defendant must not —

(a) remove from Hong Kong any of his assets which are within Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the value of HK\$235,281,330.77, or

(b) in any way dispose of or deal with or diminish the value of any of his assets, whether within or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned up to the same value.

(2) If the total unencumbered value of the 7th Defendant's assets in Hong Kong exceeds HK\$235,281,330.77, the 7th Defendant may remove any of those assets from Hong Kong or may dispose of or deal with them so long as the total unencumbered value of his asset still in Hong Kong remains above HK\$235,281,330.77. If the total unencumbered value of the defendant's assets in Hong Kong does not exceed HK\$ HK\$235,281,330.77, the 7th Defendant must not remove any of those assets from Hong Kong and must not dispose of or deal with any of them, but if he has other assets outside Hong Kong the 7th Defendant may dispose of or deal with those assets so long as the total unencumbered value of all his assets, whether in or outside Hong Kong, remains above HK\$235,281,330.77.

Disclosure of information

6. (1) The 7th Defendant must inform the plaintiff in writing at once of all his assets of an individual value of HK\$10,000 or more, whether in or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned, giving the value, location and details of all such asset.

- (2) This information must be confirmed in an affidavit which must be served on the plaintiff's solicitors within 3 days after this Order has been served on the defendant.

EXCEPTIONS TO PARAGRAPH 6

7. (1) This Order does not prohibit the 7th Defendant from spending HK\$10,000 per week towards his ordinary and proper business expenses and also a reasonable sum on legal advice and representation.
- (2) The 7th Defendant may agree with the Plaintiff's solicitors that the above spending limits should be increased or that this Order should be varied in any other respect, but any such agreement must be in writing.
- (3) This Order shall cease to have effect if the 7th Defendant provides security by paying the sum of HK\$235,281,330.77 into court or makes provision for security in that sum by some other method agreed with the plaintiff's solicitors or approved by the court.

DURATION OF THIS ORDER

8. (1) This Order will remain in force up to and including the 2nd August 2025 ("return date"), unless before then it is varied or discharged by a further order of the court.
- (2) The application in which this Order is made shall come back to the court for further hearing on the return date unless the 7th Defendant pays the sum of HK\$235,281,330.77 into court or makes provision for security in that sum by some other method as provided for hereinabove and serves notice that it does not require the application to come back to court.

EFFECT OF THIS ORDER

9. A defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents, or in any other way.

10. A defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

THIRD PARTIES

11. *Effect of this Order.* It is a contempt of Court for any person notified of this Order knowingly to assist in or permit a breach of this Order. Any person doing so may be imprisoned, fined or have his assets seized.
12. *Effect of this Order outside Hong Kong.* The terms of this Order do not affect or concern anyone outside Hong Kong until it is declared enforceable or is enforced by a court in another jurisdiction and then they are to affect him only to the extent they have been declared enforceable or have been enforced UNLESS such person is:
 - 12.1. a person to whom this Order is addressed or an officer or an agent appointed by power of attorney of such a person; or
 - 12.2. a person who is subject to the jurisdiction of this court and (i) has been given written notice of this Order at his residence or place of business within the jurisdiction of this court and (ii) is able to prevent acts or omissions outside the jurisdiction of this court which are a breach or assist in a breach of this Order.
13. *Set off by banks.* This injunction does not prevent any bank from exercising any right of set-off it may have in respect of any facility which it gave to the defendant before it was notified of this Order.
14. *Withdrawals by the defendant.* No bank need to inquire as to the application or proposed application of any money withdrawn by the defendant if the withdrawal appears to be permitted by this Order.

SERVICE OUT OF THE JURISDICTION AND SUBSTITUTED SERVICE

15. The Plaintiff may serve the amended writ of summons, the amended statement of claim, this injunction, and subsequent court documents and correspondence on the 7th Defendant by NFT Airdrop to the addresses at paragraph 3A of the Amended Statement of Claim.
16. If the 7th Defendant wishes to defend the action he must acknowledge service within 21 days of being served with the amended writ of summons.

UNDERTAKINGS

17. The Plaintiff gives to the Court the undertakings set out in Schedule 2 of this Order.

VARIATION OR DISCHARGE OF THIS ORDER

18. The Defendant (or anyone notified of this Order) may apply to the Court at any time to vary or discharge this Order (or so much of it as affects that person), but anyone wishing to do so should first inform the Plaintiff's solicitors.

NAME AND ADDRESS OF PLAINTIFF'S SOLICITORS

The Plaintiff's solicitors are: Messrs. Edwin Yun & Co
Room 1101, 11/F, 54-58 Des Voeux Road
Central, Hong Kong

Tel: (852) 28155116

Fax: (852) 2815 5269

INTERPRETATION OF THIS ORDER

19. In this Order "he", "him" or "his" include "she", "her", "hers" and "it" or "its".
20. When there are two or more defendants then (unless otherwise stated):
 - (a) References to "the defendant" mean both or all of them;
 - (b) An order requiring "the defendant" to do or not to do anything requires each

defendant to do it or not to do it; and

- (c) A requirement relating to service of this Order, or of any legal proceedings on “the defendant” means on each of them.

21. There be liberty to apply.

22. Costs be reserved.

Dated the 30th day of July 2025

Registrar

SCHEDULE 1

Affirmations

The Judge read the following affirmations before making this Order:

- (1) A draft amended Writ of Summons filed on 30 July 2025;
- (2) A draft amended Statement of Claim filed on 30 July 2025;
- (3) 2nd Affirmation of YAN YU YING dated 25 July 2025;
- (4) 4th Affirmation of CHOW KAM PUI dated 25 July 2025 with exhibits referred to therein.

SCHEDULE 2

Undertakings given to the Court by the plaintiff

- (1) If the Court later finds that this Order has caused loss to the Defendant or any other party and decides that the Defendant or that other party should be compensated for that loss, the Plaintiff will comply with any order the Court may make.
- (2) As soon as practicable the Plaintiff will serve on the Defendant a sealed copy of this Order.
- (3) As soon as practicable the plaintiff will serve on the defendant a summons to be heard on the return date together with a copy of the affidavits and copiable exhibits containing the evidence relied on by the plaintiff and a copy of the skeleton argument used at the application for this Order. Unless impracticable photographs of non-copiable exhibits should also be served.
- (4) Anyone notified of this Order will be given a copy of it by the Plaintiff's solicitors.
- (5) The Plaintiff will pay the reasonable costs of anyone other than the Defendant which have been incurred as a result of this Order including the costs of ascertaining whether that person holds any of the Defendant's assets and if the Court later finds that this Order has caused such a person loss, and decides that such person should be compensated for that loss, the Plaintiff will comply with any order the Court may make.
- (6) The Plaintiff will not without the leave of the Court begin proceedings against any of the 7th Defendant who complies with the self-identification order at Paragraph 3 above and are joined as named defendants in this action in any other jurisdictions or use information obtained as a result of an order of the Court in the jurisdiction for the purpose of civil or criminal proceedings in any other jurisdiction. The Plaintiff do have leave to use information and documents obtained as a result of this Order for the purpose of proceedings (actual or contemplated) for

- (a) Investigating the whereabouts of all or any of the 361 Bitcoins or traceable proceeds transferred out of the Subject Addresses, and the identities and/or wrongdoings of the persons or entities involved in the receipt, handling, transfers or disposals of such bitcoins or proceeds; and/or
 - (b) Commencing and pursuing new legal proceedings or pursuing existing legal proceedings, whether in Hong Kong or elsewhere, against such persons implicated in any wrongdoings as revealed upon the carrying out of such investigation, including for the avoidance of doubt *ex parte Mareva* and/or proprietary applications (or their equivalent in other jurisdictions).
- (7) The Plaintiff will not without the leave of the Court seek to enforce this Order outside Hong Kong or seek an order of a similar nature including orders conferring a charge or other security against the Defendant or the Defendant's assets.
- (8) If for any reason this Order ceases to have effect (including in particular where the Defendant provides security as provided for above), the Plaintiff will forthwith take all reasonable steps to inform, in writing, any person or company to whom he has given notice of this Order, or who he has reasonable grounds for supposing may act upon this Order, that it has ceased to have effect.

Take Notice

This is a legal document. The consequences of ignoring it may be serious. If in doubt, you should enquire as soon as possible at the Registry of the Court issuing the document, namely, High Court, Hong Kong at LG1, High Court Building, No. 38 Queensway, Hong Kong. You should consider taking the advice of a Solicitor or applying for Legal Aid.

請注意

因這是法律文件，忽視它可帶來嚴重的後果。如有疑問，請盡早向發出文件的法庭登記處，香港金鐘道 38 號高等法院低層 1 樓查詢。你亦應考慮聽取律師的意見或是申請法律援助。

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

O R D E R

Filed on :

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