

Claim nature:  
A. Mixed Claim  
B. Tort / Trust



HCA 82/2026

DRN: 257240008476

Folio / Serial No: F1

No. 1

**Writ of Summons**

(O. 6 r. 1)

HCA 82

High Court Accounts Office

01-001-2026-004155

15/01/2026 02:18 PM

1,045.00

FC2

CHQ

1,045.00

Fees Paid

1,045.00

Remark:

207285(CHQ)



**IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026**

BETWEEN

LIU DAN

Plaintiff

and

The holder of the electronic cryptocurrency wallet with the  
Tron address TYJ6cUCbETyjufreo9hMPtXWZzAAWx3DYn

1<sup>st</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TRznt2uknCUdWWkMDMtfgnmlgrQ9cfZkrH

2<sup>nd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az

3<sup>rd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TNNvsdeLPvccsV3xVFJHojWv2kGuv4F2nM

4<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b

5<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z

6<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TDYNY1oXZMCkPUuLMBqe4D64xm46nd4bLm

7<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2

8<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk

9<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M	10 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcG5mBqfqNtySNya	11 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL	12 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6	13 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ	14 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the ETH blockchain address 0x1020508c8b9Ffa57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

---

**WRIT OF SUMMONS**

---

TO THE 1ST DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TYJ6cUCbETyjufreo9hMPtXWZzAAWx3DYn.

TO THE 2ND DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH.

TO THE 3RD DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az.

TO THE 4TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TNNvsdeLPvccsV3xVFJHojWv2kGuv4F2nM.

TO THE 5TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b.

TO THE 6TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z.

TO THE 7TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TDYNY1oXZMCKPUuLMBqe4D64xm46nd4bLm.

TO THE 8TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2.

TO THE 9TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk.

TO THE 10TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M.

TO THE 11TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya.

TO THE 12TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL.

TO THE 13TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6.

TO THE 14TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ.

TO THE 15TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6.

TO THE 16TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN.

TO THE 17TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb.

TO THE 18TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP.

TO THE 19TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL.

TO THE 20TH DEFENDANT, the holder of the electronic cryptocurrency wallet with the ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD.

THIS 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 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 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 Acknowledgment within the time stated, or if you return the 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 Acknowledgment of Service.

Issued from the Registry of the High Court this 16<sup>th</sup> day of January 2026.

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 Acknowledgment of Service are given with the accompanying form.

A 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 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 WRIT was issued by Messrs. Eric Chow & Co., of 3401, Alexandra House, 18 Chater Road, Central, Hong Kong, Solicitors for the Plaintiff whose address is at [REDACTED]

*Eric Chow & Co.*

**ERIC CHOW & CO.**

*Solicitors for the Plaintiff*

(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.

## **IMPORTANT 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 Registry LG1, High Court Building, 38 Queensway, Hong Kong. You should also consider taking the advice of a solicitor or applying for Legal Aid.)

(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，其地址為香港金鐘道三十八號高等法院大樓低層一樓查詢。你亦應考慮聽取律師的意見或是申請法律援助。)

IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026

---

BETWEEN

LIU DAN

Plaintiff

and

The holder of the electronic cryptocurrency wallet with the  
Tron address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn

1<sup>st</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH

2<sup>nd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az

3<sup>rd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM

4<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b

5<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z

6<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TDYNY1oXZMCkPUuLMBqe4D64xm46nd4bLm

7<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2

8<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the  
Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk

9<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M	10 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya	11 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL	12 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6	13 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ	14 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y3lw6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

## STATEMENT OF CLAIM

### **A. The Parties**

1. The Plaintiff is and was at all material times the holder of a Bitcoin wallet with Bitcoin blockchain address 15ve1sj5fXFdcYRAvQehpxiokFFA4Wr8ZV (the “**Bitpie Wallet**”) via the online application “比特派 (Bitpie)” (the “**Bitpie Online App**”) on his mobile device (the “**iPhone**”).
2. The 1<sup>st</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TYJ6cUCbETyjufreo9hMPtXWZzAAWx3Dyn (“**D1’s Crypto Wallet**”).
3. The 2<sup>nd</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH (“**D2’s Crypto Wallet**”).
4. The 3<sup>rd</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az (“**D3’s Crypto Wallet**”).
5. The 4<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM (“**D4’s Crypto Wallet**”).
6. The 5<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b (“**D5’s Crypto Wallet**”).
7. The 6<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z (“**D6’s Crypto Wallet**”).

8. The 7<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TDYNY1oXZMckPUuLMBqe4D64xm46nd4bLm (“**D7’s Crypto Wallet**”).
9. The 8<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2 (“**D8’s Crypto Wallet**”).
10. The 9<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk (“**D9’s Crypto Wallet**”).
11. The 10<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M (“**D10’s Crypto Wallet**”).
12. The 11<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya (“**D11’s Crypto Wallet**”).
13. The 12<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TPmwhJgxPBvL1DRhG4TFaFCcxU7D6kXYeL (“**D12’s Crypto Wallet**”).
14. The 13<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6 (“**D13’s Crypto Wallet**”).
15. The 14<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ (“**D14’s Crypto Wallet**”).
16. The 15<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6 (“**D15’s Crypto Wallet**”).



17. The 16<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN (“**D16’s Crypto Wallet**”).
18. The 17<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb. (“**D17’s Crypto Wallet**”).
19. The 18<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address THHbl6mPT5eYd9Hap6y8TLArqodHNzQsmP (“**D18’s Crypto Wallet**”).
20. The 19<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL (“**D19’s Crypto Wallet**”).
21. The 20<sup>th</sup> Defendant is and was at all material times the holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD (“**D20’s Crypto Wallet**”).

**B. The Plaintiff’s Initial Use of the Bitpie Online App**

22. In or around 2018, the Plaintiff started purchasing the cryptocurrency Bitcoin via the Bitpie Online App on his iPhone. The Bitpie Online App served the function of a cryptocurrency wallet for the purposes of holding cryptocurrencies such as Bitcoin.
23. Subsequently, in around 2020, the Plaintiff ceased using the Bitpie Wallet to purchase and hold Bitcoin.
24. In around September 2021, in view of updated regulations issued by the government of the People’s Republic of China (“**PRC**”) on the operation of cryptocurrency wallets (the “**PRC Cryptocurrency Regulations**”), several online cryptocurrency wallets and online applications were removed from the Apple “App Store” for the iOS Operating System in the PRC (the “**PRC App Store**”). However, as the Plaintiff had stopped purchasing Bitcoin and/or using the Bitpie Wallet at the material time, the

Plaintiff did not take further steps to investigate the status of his Bitpie Wallet or the Bitpie Online App.

**C. The Plaintiff's Downloading of the Fplash Runner 3D Online App**

25. On around 3 April 2024, the Plaintiff wished to check the status of his Bitpie Wallet, and therefore opened the Bitpie Online App on his iPhone. However, the Plaintiff discovered that he was unable to open the Bitpie Online App.
26. Consequently the Plaintiff visited the PRC App Store on his iPhone and entered the search term “比特派” (the Chinese translation of “Bitpie”) to investigate. At the top of the search results was an online application by the name of “Fplash Runner 3D” (the “**Fplash Runner 3D Online App**”).
27. In this regard, the Fplash Runner 3D Online App (as described in the introduction on the app store, which users could view without needing to download the app) alerted users to the fact that the PRC Cryptocurrency Regulations have, *inter alia*, limited the use of cryptocurrency in the PRC: “因政策影响，已限制中国境内用户访问和使用第三方金融应用” (the “**Alert**”). The words that immediately followed the Alert prompted users to download the Fplash Runner 3D Online App via a separate link: “请进入此应用下载官方软件” (the “**Third Party Link**”). The Third Party Link served as an alternative means to download online applications that were not available for direct download via the PRC App Store.
28. At the time, as the Plaintiff had faith in Apple's operations of the PRC App Store, and was also under the impression that the Third Party Link was an alternative platform employed by the company operating the Bitpie Online App due to the PRC Cryptocurrency Regulations, the Plaintiff proceeded to download the Third Party Link.
29. In the process of navigating the Third Party Link, the Plaintiff was directed to a page imitating and/or purporting to be an interface for downloading the Bitpie Wallet. The aforementioned page provided a download link and instructions for installing the Bitpie Wallet (the “**Download Link**”).

30. After clicking the Download Link, the Plaintiff was prompted to accept installation of a programme to ensure compatibility between the software to be downloaded via the Download Link and the software on the Plaintiff's iPhone, namely the iOS17 mobile operating system (the "**Installation**").

**D. The Plaintiff's Installation of the Fake Bitpie Online App**

31. After accepting the Installation, the Plaintiff was directed to a page which purported to provide confirmation that an Apple-verified programme was installed on his iPhone, and that the iOS17 system on his iPhone supported the operations of the aforementioned programme. Indeed, after navigating certain tabs on his iPhone, namely the (i) "Set-up (设置)" tab; (ii) "Use (通用)" tab; and (iii) "VPN and Systems Management (VPN 与设备管理)" tab, the Plaintiff landed on a page which provided information on the programme that had been installed on his iPhone. Importantly, the said page also expressly noted that the programme had been verified (已验证) (the "**Verification**").
32. In reliance on the Verification and on the faith that Apple would adopt stringent procedures and regulations in relation to mobile applications on its PRC App Store, the Plaintiff opened the online application purporting to be the Bitpie Online App that he downloaded via the Download Link (the "**Fake Bitpie Online App**").
33. It is averred that the Fake Bitpie Online App was an exact imitation of the Bitpie Online App. There were no identifiable differences between the two and the Plaintiff was even able to use his previous account to log on to the Fake Bitpie Online App. Further, the "Personal Details (个人信息)" page on the Fake Bitpie Online App had no material difference from the same page the Bitpie Online App, and the Plaintiff was also able to access his prior transaction records on the Fake Bitpie Online App.
34. In light of the aforesaid, the Plaintiff attempted to access the Bitpie Wallet on the Fake Bitpie Online App and inputted his personal details including his profile picture, his account username and his user identification therein.

**E. The Plaintiff's Discovery of the Fraud**

35. On 3 April 2024, the Plaintiff attempted to open the Bitpie Wallet but realised that he remained unable to operate the Bitpie Wallet. Consequently, the Plaintiff decided to redownload and reinstall what he thought was the Bitpie Online Application (i.e. the Fake Bitpie Online App).
36. Following the reinstallation of the Fake Bitpie Online App, the Plaintiff accessed the Bitpie Wallet and realised that all of his assets in the Bitpie Wallet had disappeared.
37. The Plaintiff immediately checked his transaction records and discovered that all of the Bitcoin in his Bitpie Wallet had been transferred out in two tranches, respectively at 9:18 pm and 9:23pm on 6 April 2024 (“**P’s Stolen Bitcoin**”).
38. The Plaintiff then came to the realisation that he had fallen prey to online fraud (the “**Fraud**”) procured using the Fake Bitpie Online App. He therefore took immediate steps to lodge a police report with the Shenzhen Baoan District Zhennan Office (深圳市宝安区镇南派出所) on the night of 6 April 2024 (the “**Police Report**”).
39. Upon further investigation of the relevant transaction records, the Plaintiff noted that P’s Stolen Bitcoin had been transferred to the following addresses: (i) bc1ps82r3xdrpdxxv9aeqsqawjxcy905pudeheug9wt5uumzpwyl35fqvj3mwz and (ii) 19QGCPsEuCR6568JfqQhanA5bG2Lym5xQz. The Plaintiff also reviewed other related transactions and realised that P’s Stolen Bitcoin had been swiftly dissipated to many cryptocurrency wallets, resulting in an unusual and complex pattern of fund flow as further pleaded to in **Section F** below.
40. Following the Police Report, on or around 16 April 2024, the Shenzhen Municipal Public Security Bureau (中国深圳市公安局) officially opened a formal case for fraud and has commenced investigations.

**F. The Laundering and Dissipation of P's Stolen Bitcoin**

***F.1 Transfers of P's Stolen Bitcoin between Bitcoin blockchain addresses***

41. On around 6 April 2024, P's Stolen Bitcoin in the amount of 100 Bitcoin was dissipated from the Plaintiff's Bitpie Wallet to the following Bitcoin blockchain addresses in the following order:-

41.1. bc1ps82r3xdrpdxxv9aeqsqawjxcy905pudeheug9wt5uumzpwyl35fqvj3mwz;

41.2. 19QGCPsEuCR6568JfqQhanA5bG2Lym5xQz;

41.3. bc1pm8s5e6sk86qlr0esz20r4xsumdwarjs04m9u85xn632vjksuj74sv3965t;  
and

41.4. 14XQs8PBLqgV8whqutReE4Wgt5wjnL6Mxn (the "Final BTC Address").

(collectively, the "BTC Transfers")

***F.2 Transfers of P's Stolen Bitcoin from the Final BTC Address via SWFT to TRON blockchain addresses***

42. Thereafter, P's Stolen Bitcoin was converted from Bitcoin currency ("BTC") to Tether currency ("USDT") on the TRON network ("TRON") via the SWFT platform in the manner pleaded to hereinbelow. The main transfers of P's stolen bitcoins in this regard are as follows:-

42.1. Following the series of BTC Transfers pleaded in **Section F1** above, on around 7 and 8 April 2024, 80 BTC was transferred to the Bitcoin blockchain address 14XQs8PBLqgV8whqutReE4Wgt5wjnL6Mxn, the Final BTC Address identified at paragraph 41.4 above.

42.2. Out of the 80 BTC held in the Final BTC Address, on around 7 and 8 April 2024, 20.13 BTC were transferred in multiple tranches via the SWFT

platform and ultimately reached the following 41 distinct TRON blockchain addresses identified and pleaded below, which had received and accepted these transfers (the “**Initial TRON Addresses**”):-

No.	TRON blockchain address	Date of Transfer
1.	TTfYyu8rphHvPRc43xp6b1L8hkYK4PSG1a	8 April 2024
2.	TP69brh9FhRAA86P16NDotwoh6NxApaSeH	8 April 2024
3.	TBptBgZdC2BKFE3TE659HJeZkjTa71ejdb	8 April 2024
4.	TJavbP4gX66WijXfoXLLCxcwgEeVC2UsWEf	8 April 2024
5.	TM65ZaVWNrNQ9QDEEARBFmdibSiNBTgkJ8	8 April 2024
6.	TSbX1KMFri2gfVT6RhNQHdXstd8wxFpVHw	8 April 2024
7.	TXv6SjGju3qZ8wYwhtF2XoEq4c55VAjC65	8 April 2024
8.	TNRkgvZ65PmLdtrN5Jv7VUDRhE5otFnUGq	8 April 2024
9.	TGSxtYXYr7NSZmjvz9copjxhYv4NfWTMXN	8 April 2024
10.	TScWwRkN8kq39FxrMcC8isaFTMdgePqrZR	8 April 2024
11.	THnY2QHUTWWvguFuDHFVPMWVnPas6JxtE	8 April 2024
12.	TUGfeneK5jQr133fb8zsRdwxhiC5V14syE	8 April 2024
13.	TRym1QvUPJay3sun7GePrXTdad4S4ffMdz	8 April 2024
14.	TVH3DgURSFrQsgt6BtufkSaXYPsx8ya9Qc	8 April 2024
15.	TXiLWfYAcgNHBXzaMLQSnq45UAqFnQKkAK	8 April 2024
16.	TDqRdyHNbWbw8KUQiza5p5zwZUxAoKspmD	8 April 2024
17.	TVpCsqptVeuUPcRxJAVC5iFQ3xBf3rxCWY	8 April 2024
18.	TTzQmMjGXaihq7WPBLFgbCd3Ne2ofBPFmj	7 and 8 April 2024
19.	THZA1bQE55XJ2MLPmssSuWqG8sWGV8xhbv	7 and 8 April 2024
20.	TJuePuN4292CzkumKmsS5Di1CRv4wqtDNX	7 April 2024
21.	TYvfXdKpA6cHmB5TAEQBbLUN7kmkGk6hS5	7 April 2024
22.	TFNuU9QFrob7bqgG5w7S2CR8AUeK3muNwX	7 April 2024
23.	TWaNaEoGTArzbYTpJeGixfJdKfNTpDKobr	7 April 2024
24.	TCd49mRBXTryuvagJe9wVEXmCLczoa6ReY	7 April 2024
25.	TQRPHKncxe2qXzxPTgLIYy9iXcqA3dEQG6	7 April 2024
26.	TLVnnnqDz9zvJsBA6SZekDbrbgeyGYDrxF	7 April 2024
27.	TYrgl7AzgeleCY6TgqzZnASDLfGEy8CQJD	7 April 2024
28.	TVBFucTasJTfqpRgxTMZWEsxXrP9oaxmpU	7 April 2024

No.	TRON blockchain address	Date of Transfer
29.	TTG6XZXAY13ZgphyEoNtEeK622gLR2pfUN	7 April 2024
30.	TNZicAtnqgKvrfgJphNZuhW71PvqenfifD	7 April 2024
31.	TBpHtAmsuChymXASQjsLrJpqv4funs7Yrz	7 April 2024
32.	TXbEARvCyAJSoU47fD1LXzhW6hKF2c8j4H	7 April 2024
33.	TL7ghhiNNGHCuLTwhnGXbmLG9oD8mSgsG6	7 April 2024
34.	TKJm4XgprBd6ELWfVyzqDzv2Kxf73TS8yF	7 April 2024
35.	TRqTEp7RHth2yyBPVT7pvg8TvZ3KA1ES2H	7 April 2024
36.	TMetHA6ei5gACtk6esPvCvseNa7U8TaH9m	7 April 2024
37.	TRyEJpvTccVP4vYWrHsTTvq3DaNwjgmCFA	8 April 2024
38.	TCyDMGSwYtmVMtUhtGpTCr8nlx5V2ELw8c	7 and 8 April 2024
39.	TWve9vnE4e4ZxeYeQpQpPGeky9pwnYfdW1	8 April 2024
40.	TMcuTf52mFN65UiT9HeAiZz6Ghg8EXxCjw	7 April 2024
41.	TEExLCmmwWfH6ApFWib475ztXtU8R2yVQz7	7 April 2024

- 42.3. Thereafter, the funds in the Initial TRON Addresses were converted to USDT and transferred into 9 further TRON blockchain addresses (the “**Further TRON Addresses**”), the details of which are as follows (the “**TRON-USDT Transfers**”):-

Initial TRON Addresses	Further TRON Addresses to which USDT was transferred	Date of Transfer
TTfYyu8rphHvPRc43xp6b1L8hkYK4PSG1a	TYJ6cUCbETyjuFREo9hMP tXWZzAAWx3DYn (“ <b>Further TRON Address 1</b> ”)	8 April 2024
TP69brh9FhRAA86P16NDotwoh6NxApasEh	Further TRON Address 1	8 April 2024
TBptBgZdC2BKFE3TE659HJeZkjTa71ejdb	Further TRON Address 1	8 April 2024
TJavbP4gX66WijXfoXLLCxbwEeVC2UsWEf	Further TRON Address 1	8 April 2024



Initial TRON Addresses	Further TRON Addresses to which USDT was transferred	Date of Transfer
TM65ZaVWNrNQ9QDEEARBFmdibSiN BTgkJ8	Further TRON Address 1	8 April 2024
TSbX1KMFri2gfVT6RhNQhdXstd8wxFp VHw	Further TRON Address 1	8 April 2024
TRyEJpvTccVP4vYWrHsTTvq3DaNwjgm CFA	Further TRON Address 1	8 April 2024
TNRkgvZ65PmLdtrN5Jv7VUDRhE5otFn UGq	TRznt2uknCUdWWkMD Mtfgnm1grQ9cfZkrH (“Further TRON Address 2”)	8 April 2024
TGSxtYXYr7NSZmjvz9copjxhYv4NfWT MXN	Further TRON Address 2	8 April 2024
TXv6SjGju3qZ8wYwhF2XoEq4c55VAjC 65	Further TRON Address 2	8 April 2024
TPmwhJgxPBvL1DRhG4TFAfCcxU7D6k XYeL	Further TRON Address 2	8 April 2024
TScWwRkN8kq39FxrMcC8isaFTMdgePqr ZR	TFZXDYhEi89bQuSWjm Voq6qc33ybrGB1Az (“Further TRON Address 3”)	8 April 2024
THnY2QHUTWWvguFuDHFVPMWVn Pas6JxtE	Further TRON Address 3	8 April 2024
TUGfeneK5jQr133fb8zsRdwXhiC5V14syE	Further TRON Address 3	8 April 2024
TCyDMGSwYtmVMtUhTGpTCr8n1x5V2 ELw8c	Further TRON Address 3	8 April 2024
TWve9vnE4e4ZxeYeQpQpPGeky9pwnYf dW1	Further TRON Address 3	8 April 2024
TRym1QvUPJay3sun7GePrXTdad4S4ffM dz	TNnvsdeLPvccsV3xVFJHo jWv2kGuv4F2nM (“Further TRON Address 4”)	8 April 2024

Initial TRON Addresses	Further TRON Addresses to which USDT was transferred	Date of Transfer
TVH3DgURSFrQsgt6BtufkSaXYPsx8ya9Qc	Further TRON Address 4	8 April 2024
TXiLWfYAcgNHBXzaMLQSnq45UAqFnQKkAK	Further TRON Address 4	8 April 2024
TDqRdyHNbWbw8KUQiza5p5zwZUxAoKspmd	Further TRON Address 4	8 April 2024
TVpCsqptVeuUPcRxJAVC5iFQ3xBf3rxCWY	Further TRON Address 4	8 April 2024
TTzQmMjGXaihq7WPBLFgbCd3Ne2ofBPFmj	Tet4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b (“Further TRON Address 5”)	8 April 2024
THZA1bQE55XJ2MLPmssSuWqG8sWGV8xhbv	Further TRON Address 5	8 April 2024
TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z (“Further TRON Address 6”)	Further TRON Address 5	8 April 2024
TJuePuN4292CzkumKmsS5Di1CRv4wqtDNX	Further TRON Address 6	7 April 2024
TYvfXdKpA6cHmB5TAEQBbLUN7kmgGk6hS5	Further TRON Address 6	7 April 2024
TFNuU9QFrob7bqgG5w7S2CR8AUeK3muNwX	Further TRON Address 6	7 April 2024
TWaNaeoGTArzbYTpJeGixfJDkFNTpDKobr	Further TRON Address 6	7 April 2024
TCd49mRBXTryuvagJe9wVEXmCLczoa6ReY	Further TRON Address 6	7 April 2024
TQRPHKncxe2qXzxPTgL1Yy9iXcqA3dEQG6	Further TRON Address 6	7 April 2024
TMcuTf52mFN65UiT9HeAiZz6Ghg8EXxCjw	Further TRON Address 6	7 April 2024

Initial TRON Addresses	Further TRON Addresses to which USDT was transferred	Date of Transfer
TLVnnnqDz9zvJsBA6SZekDbrbgeyGYDrxF	TDYNY1oXZMckPUuLM Bqe4D64xm46nd4bLm (“Further TRON Address 7”)	7 April 2024
TYrgl7AzgeleCY6TgqzZnASDLfGEy8CQJD	Further TRON Address 7	7 April 2024
TVBFucTasJTfqpRgxTMZWEsxXrP9oaxmpU	Further TRON Address 7	7 April 2024
TTG6XZXAY13ZgphyEoNtEeK622gLR2pfUN	Further TRON Address 7	7 April 2024
TNZicAtnqgKvrfgJphNZuhW7lPvqenfifD	TYF4TbdMQ8bbtGgGjUx kMcc2U6witLQjo2 (“Further TRON Address 8”)	7 April 2024
TBpHtAmsuChymXASQjsLrJpqv4funs7Yrz	Further TRON Address 8	7 April 2024
TXbEARvCyAJSoU47fD1LXzhW6hKF2c8j4H	Further TRON Address 8	7 April 2024
TExLCmmwWfH6ApFWib475ztXtU8R2yVQz7	Further TRON Address 8	7 April 2024
TL7ghhiNNGHCuLTwhnGXbmLG9oD8mSgsG6	TDptPDG9sXnLJfrefoBVk GfQyL4UzUhUzk (“Further TRON Address 9”)	7 April 2024
TKJm4XgprBd6ELWfVyzqDzv2Kxf73TS8yF	Further TRON Address 9	7 April 2024
TRqTEp7RHth2yyBPVT7pvg8TvZ3KA1ES2H	Further TRON Address 9	7 April 2024
TMetHA6ei5gACtk6esPvCvseNa7U8TaH9m	Further TRON Address 9	7 April 2024

43. Following the series of TRON-USDT Transfers, the following USDT amounts now remain in the Further TRON Addresses:-

Further TRON Addresses	Amount in USDT
Further TRON Address 1	151,148.00
Further TRON Address 2	137,105.049792
Further TRON Address 3	171,546.0
Further TRON Address 4	172,534.351146
Further TRON Address 5	169,412.488627
Further TRON Address 6	143,740.00
Further TRON Address 7	157,672.347256
Further TRON Address 8	160,642.181898
Further TRON Address 9	156,968.434456
Total:	1,420,768.85

44. On around 10 May 2024, the 1,420,768.85 USDT now remaining in the Further TRON Addresses as pleaded and particularised above was and is subject to a freezing order imposed by the law enforcement authorities in the PRC (the “**Freezing Order**”).

***F.3 Transfers of P’s Stolen Bitcoin from the Final BTC Address to ETH blockchain addresses***

45. In addition to the above, the online hackers also sought to convert P’s Stolen Bitcoin from BTC to USDT on the Ethereum network (“**ETH**”). The key transfers of P’s Stolen Bitcoin are as follows:-

45.1. As pleaded in **Section F.1** above, following the series of BTC Transfers, on around 7 and 8 April 2024, 80 BTC was transferred to 14XQs8PBLqgV8whqutReE4Wgt5wjnL6Mxn, the Final BTC Address identified at paragraph 41.4 above.

45.2. Of the 80 BTC in the Final BTC Address, on around 7 and 8 April 2024, a total of 40.38561222 BTC was transferred to the following 10 Initial THOR Addresses via a series of THORChain (“**THOR**”) blockchain addresses.

Subsequently, on around 8 and 9 April 2024, out of this BTC amount, 36.1282 BTC was ultimately transferred to a final ETH blockchain address: 0x88e5edb58da09946fcd427a939df77bbb2d0b6bf (the “**ETH Address 1**”) via another series of THOR blockchain addresses (the “**THOR-ETH Transfers**”).

45.3. The **THOR-ETH Transfers** can be divided into two stages. Stage 1 involved the transfer of the 40.38561222BTC to the following Initial THOR Addresses on around 8 and 9 April 2024, with 25.88561222 BTC transferred directly to Initial THOR Address 2 and 14.5 BTC transferred collectively to the other nine Initial THOR Addresses:

- (1) 10.5 BTC was transferred to 12nnpFY2oF321w4esuKTXQcUQtBxBcu6AK (“**Initial THOR Address 1**”) on around 8 April 2024;
- (2) 25.88561222 BTC was transferred to bc1qc2px3mvwl306dcu6y4xgvdlmm75utg7vt2q6p3 (“**Initial THOR Address 2**”) on around 8 and 9 April 2024;
- (3) 0.5 BTC was transferred to 1EWicpJbWQFdPPJB42peNK7ryXSZEsPubW (“**Initial THOR Address 3**”) on around 8 April 2024 ;
- (4) 0.5 BTC was transferred to 13FMV9XzTsfNoSGx4naZHeqSEVVpAaTUWz (“**Initial THOR Address 4**”) on around 8 April 2024;
- (5) 0.5 BTC was transferred to 1LdXZCxuE5WTuWELjJsiegYSTYrerMBcF (“**Initial THOR Address 5**”) on around 8 April 2024;

- (6) 0.5 BTC was transferred to 1FBbcz5MasSPjmXniQQB9zCu5cgnxv1ZBF (“**Initial THOR Address 6**”) on around 8 April 2024;
- (7) 0.5 BTC was transferred to 1EYSRfHmrWCBpm6z2yzvFyFYjcug8ii39s (“**Initial THOR Address 7**”) on around 8 April 2024;
- (8) 0.5 BTC was transferred to 1GQ7t29kuTmD24N8YNkzxD74jnb7M9msig (“**Initial THOR Address 8**”) on around 8 April 2024;
- (9) 0.5 BTC was transferred to 178XX2jLUf5tspZ3yJfmU1xYyS1jsd9ELd (“**Initial THOR Address 9**”) on around 8 April 2024; and
- (10) 0.5 BTC was transferred to 1LPch9hti9DitRK7nePcLfbpQx5K8kR12c (“**Initial THOR Address 10**”) on around 8 April 2024.

(collectively, the “**Initial THOR Addresses**”)

45.4. Stage 2 involved the following transfers from the Initial THOR Addresses (the “**Stage 2 THOR-ETH Transfer**”) on around 8 April 2024:-

- (1) Initial THOR Addresses 1 and 3 to 10 each transferred their respective holdings of BTC to Initial THOR Address 2, resulting in a total transfer of 10.49318078 BTC to Initial THOR Address 2 as follows:

<b>Initial THOR Addresses</b>	<b>Blockchain addresses to which the 36.1282 BTC was transferred</b>	<b>Date of Transfer</b>	<b>Amount (BTC)</b>
Initial THOR Address 1	Initial THOR Address 2	8 April 2024	7.69982376
Initial THOR Address 3	Initial THOR Address 2	8 April 2024	0.25909455
Initial THOR Address 4	Initial THOR Address 2	8 April 2024	0.25820181
Initial THOR Address 5	Initial THOR Address 2	8 April 2024	0.25909455
Initial THOR Address 6	Initial THOR Address 2	8 April 2024	0.25909455
Initial THOR Address 7	Initial THOR Address 2	8 April 2024	0.49962539
Initial THOR Address 8	Initial THOR Address 2	8 April 2024	0.49962539
Initial THOR Address 9	Initial THOR Address 2	8 April 2024	0.25899539
Initial THOR Address 10	Initial THOR Address 2	8 April 2024	0.49962539

45.5. Subsequently, on 8 and 9 April 2024, 36.1282 BTC was further transferred from Initial THOR Address 2 to ETH Address 1.

45.6. Upon transfer of the 36.1282 BTC to the ETH Address 1, on around 8 and 9 April 2024, the same was converted to 2,540,005.3746 USDT.



46. Following the THOR-ETH Transfers, the following further transfers were then carried out:-

- 46.1. On around 8 and 9 April 2024, 2,540,005.3746 USDT held in the ETH Address 1 was then transferred to a separate cryptocurrency wallet with the ETH blockchain address 0x1f9b18281FEe24C09a132662B13BA4eB4e4af1fc (the “**ETH Address 2**”).
- 46.2. Subsequently, a further 194,967.712 USDT was transferred on around 8 April 2024 from the Initial THOR Address 1 via the SWFT platform to the ETH Address 2. Out of the 194,967.712 USDT from the Initial THOR Address 1, on around 8 April 2024, 98,262.57 USDT was transferred via the SWFT platform first to an ETH blockchain address 0xDC710f8e7F8486159E0C15082767EE31058d4724 and was subsequently transferred to the ETH Address 2. On around 8 April 2024, the remaining 96,705.14 USDT was transferred directly to ETH Address 2.
- 46.3. Thereafter, on around 8 April 2024, 1,500,000 USDT was transferred from ETH Address 2 to a further cryptocurrency wallet with the ETH blockchain address 0x00000047bb99ea4d791bb749d970de71ee0b1a34 via the Transit Swap platform. Following the aforementioned transfer, approximately 1,234,973.0867 USDT remains in ETH Address 2. It is averred that, as a matter of law, the Plaintiff as a victim of the Fraud is entitled to elect for the tracing rules most favourable to him, and consequently it is averred that the 1,234,973.0867 USDT remaining in ETH Address 2 represent the traceable proceeds and/or substitutes of P’s Stolen Bitcoin.
- 46.4. On around 30 April 2024, the 1,234,973.0867 USDT remaining in ETH Address 2 was further transferred to another cryptocurrency wallet with the ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD (“**ETH Address 3**”). As of the date of this Statement of Claim, 1,234,973.0867 USDT remains in ETH Address 3 and is subject to the Freezing Order.

***F.4 Transfers of P's Stolen Bitcoin from the ETH Address 2 to further TRON blockchain addresses via transit swap***

47. As pleaded in Paragraph 46.3 hereinabove, on around 8 April 2024, 1,500,000 USDT was transferred from the ETH Address 2 to the TRON network addresses via the Transit Swap platform.
48. Via the Transit Swap platform, traceable proceeds of these funds are located in the following TRON blockchain addresses (the “**Transit Swap TRON Addresses**”) and are subject to the Freezing Order:-

<b>Transit Swap TRON Addresses</b>	<b>Amount in USDT</b>
TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M	149,323.75
TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya	149,323.75
TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL	149,323.75
TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6	149,323.75
TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ	149,323.75
TSF2adYcmivMgf8Y3lw6rmwhNzpfSSoEA6	149,323.75
TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	149,323.75
TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	149,323.75
THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	149,323.75
TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	149,323.75
Total:	1,493,237.50

**G. Constructive Trust and/or Resulting Trust**

49. By reason of the fraud perpetrated through the Fake Bitpie Online App and the fraudulent inducement of the Plaintiff to transfer P's Stolen Bitcoin, a constructive trust arose in favour of the Plaintiff, who has at all material times retained a proprietary interest in P's Stolen Bitcoin and its traceable proceeds and/or substitutes.
50. Each of the 1<sup>st</sup> to 20<sup>th</sup> Defendants who received part of P's Stolen Bitcoin (as particularised in Sections F above) and/or its traceable proceeds and/or substitutes did so as a direct result of and/or pursuant to the Fraud.

51. In the premises, each of the 1<sup>st</sup> to 20<sup>th</sup> Defendants had sufficient knowledge, including blind-eye knowledge and/or notice of the Plaintiff's Proprietary Interest in P's Stolen Bitcoin and/or the 1<sup>st</sup> to 20<sup>th</sup> Defendants' breach of fiduciary and/or trust duties in procuring such transfer(s), such that it is unconscionable for the 1<sup>st</sup> to 20<sup>th</sup> Defendants to retain the benefit of P's Stolen Bitcoin and its traceable proceeds and/or substitutes.

**Particulars of Knowledge**

- 51.1. The transfers as pleaded in Section F above were highly suspicious and irregular, or would have been perceived as highly suspicious and irregular by an honest, reasonable and/or rational person, in that they were gratuitous and/or without apparent commercial and legitimate reason.
- 51.2. P's Stolen Bitcoin was substantial in value and transferred and laundered as pleaded in Section F above in a short period of time through multiple overlapping cryptocurrency addresses. Pending discovery and/or interrogatories, it is averred no due diligence and inquires as to the source of funds received was conducted by the 1<sup>st</sup> to 20<sup>th</sup> Defendants.
- 51.3. P's Stolen Bitcoin was swiftly transferred out and/or concealed by the various transfers and exchanges in cryptocurrencies involving overlapping cryptocurrency addresses as pleaded in Section F above. In the premises, it is averred that the 1<sup>st</sup> to 20<sup>th</sup> Defendants were interconnected and acted in a coordinated manner to enable to dissipation of P's Stolen Bitcoin to individuals or entities who had no legitimate entitlement thereto. These acts were undertaken for the purpose of, or had the effect of, concealing the illicit origin of the P's Stolen Bitcoin from third parties.
- 51.4. P's Stolen Bitcoin was swiftly transferred out upon receipt by each of the 1<sup>st</sup> to 20<sup>th</sup> Defendants, in some instances in precisely the same amount received, indicating a well-coordinated and systematic laundering operation.
52. Consequently, the Plaintiff was at all material times and still is entitled to trace P's Stolen Bitcoin (or its traceable proceeds and/or substitutes), which the 1<sup>st</sup> to 20<sup>th</sup> Defendants held and still hold on trust for the Plaintiff.

53. Further and/or alternatively, as the 1<sup>st</sup> to 20<sup>th</sup> Defendants at all material times received no consideration for the various transfers of P's Stolen Bitcoin, due to the operation of law and/or the presumption of resulting trust, the 1<sup>st</sup> to 20<sup>th</sup> Defendants hold P's Stolen Bitcoin (or its traceable proceeds and/or substitutes) on resulting trust for the Plaintiff.

**H. Dishonest Assistance**

54. Further or alternatively, the Defendants are liable to the Plaintiff for dishonest assistance in breach of trust by reason of the matters pleaded in Section G above and in this Section H.

**H1. *Breach of Trust by the Recipients***

55. As trustee of P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes as pleaded in **Section G** above, it is averred that 1<sup>st</sup> to 20<sup>th</sup> Defendants owed the following common law and/or fiduciary duties and/or duties as a trustee to the Plaintiff:-

**Particulars of Duties**

- 55.1. To act with full loyalty to the Plaintiff.
- 55.2. To protect and act *bona fide* in the best interests of the Plaintiff and not for any collateral purposes, and to disclose to the Plaintiff all matters which might affect or damage its interests.
- 55.3. To utilise the assets and property of the Plaintiff in a manner which they honestly believe to be in the best interests of the Plaintiff.
- 55.4. To not make unauthorised use of the assets, property and information of the Plaintiff.
- 55.5. To avoid and prevent loss or diminution to, and to protect and preserve, the assets of the Plaintiff and the value of those assets.

- 55.6. To inform the Plaintiff of any breaches of duties.
  - 55.7. To act and exercise powers for proper purposes and to act for the proper purposes of the Plaintiff in relation to its affairs.
  - 55.8. To exercise the care, diligence and skill that a reasonably prudent person would exercise in comparable circumstances.
  - 55.9. Not to deprive the Plaintiff of, or diminish, appropriate, give away, transfer away, dispose of, make use of or allow the use of, any part or whole of the Plaintiff's value, assets, properties, information and/or opportunities, whether tangible or intangible, whether legal, equitable or otherwise, without obtaining any valuable consideration.
  - 55.10. Not to place themselves in a position where their own interest or the interest of any third party would or might conflict with the interest of the Plaintiff, and not to allow their own personal interests or other duties to conflict with the interests of and duties which he owed to the Plaintiff.
  - 55.11. Not to act for their own benefit or profit, or for the benefit or profit of any third party.
56. In breach of the constructive trust pleaded in **Section G** above, the 1<sup>st</sup> to 20<sup>th</sup> Defendants acted in breach of their fiduciary and/or trust duties, by:-
- 56.1. Wrongfully acting for their benefit by executing the transfers pleaded in Sections F above, thereby placing themselves in a position of conflict of interest and failing to act with full loyalty to the Plaintiff.
  - 56.2. Laundering, concealing, and/or otherwise dealing without authority with P's Stolen Bitcoin and/or its traceable proceeds for no, or no sufficient, consideration and/or justification, including but not limited to the transactions and transfers particularised in Sections F above, thereby failing to act with full loyalty to and to protect and act *bona fide* in the best interest of the Plaintiff.

- 56.3. Failing to inform the Plaintiff of the above breaches of fiduciary and/or trust duties.

## ***H.2 Assistance by the Defendants***

57. Each of the 1<sup>st</sup> to 20<sup>th</sup> Defendants assisted in the breach of the constructive trust in the manner pleaded in Sections G above. In summary:

### **Particulars of Assistance**

- 57.1. Pending discovery and/or further interrogatories, devising, organising, and orchestrating the Fraud, including but not limited to fabricating the Fake Bitpie Online App and inducing the Plaintiff to download and install the Fake Bitpie Wallet, thereby enabling the breaches of trust pleaded above.
- 57.2. Each of the 1<sup>st</sup> to 20<sup>th</sup> Defendants participated in the Fraud and/or the laundering, transfer, concealment, and/or other unauthorised dealing with P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes, thereby assisting in the breaches of trust or the concealment of P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes.

## ***H.3 Dishonesty of the Defendants***

58. The Defendants acted dishonestly in relation to the breach of constructive trust, in that they knew, deliberately turned a blind eye and deaf ear to, deliberately failed to make inquiries and/or were recklessly indifferent to, the perpetration of the Fraud and the fact that P's Stolen Bitcoin constituted the proceeds of that Fraud.
59. The Defendants' knowledge and state of mind may be inferred from the following matters:

### **Particulars of Knowledge**

- 59.1. The Plaintiff repeats the matters pleaded in Paragraph 51 above.

#### **H4. Loss**

60. The dishonest assistance rendered by the Defendants in breach of trust has caused loss and damage to the Plaintiff, including but not limited to the value of P's Stolen Bitcoin. The 1<sup>st</sup> to 20<sup>th</sup> Defendants are accordingly liable to pay equitable compensation and to account to the Plaintiff as accessories and as trustees for P's Stolen Bitcoin.

#### **I. Knowing Receipt**

61. Further or alternatively, the 1<sup>st</sup> to 20<sup>th</sup> Defendants are liable to the Plaintiff on the ground of knowing receipt.
62. The 1<sup>st</sup> to 20<sup>th</sup> Defendants were in receipt of P's Stolen Bitcoin and/or its traceable proceeds, as particularised in Section F above.
63. By virtue of the foregoing matters, at the time the 1<sup>st</sup> to 20<sup>th</sup> Defendants were in receipt of P's Stolen Bitcoin and/or its traceable proceeds, the 1<sup>st</sup> to 20<sup>th</sup> Defendants knew of and/or deliberately turned a blind eye to and/or had constructive notice of the Plaintiff's proprietary interest in the P's Stolen Bitcoin and/or its traceable proceeds, and/or the breaches of fiduciary duty and/or trust in procuring the transfers:

#### **Particulars of Knowledge**

- 63.1. The Plaintiff repeats the matters pleaded in Paragraph 51 above.
64. In the premises, the 1<sup>st</sup> to 20<sup>th</sup> Defendants are liable to the Plaintiff for knowing receipt of P's Stolen Bitcoin and/or its traceable proceeds which were transferred to the 1<sup>st</sup> to 20<sup>th</sup> Defendants. The Plaintiff is entitled to claim and does claim damages and/or equitable compensation and/or an account of profits as against the 1<sup>st</sup> to 20<sup>th</sup> Defendants herein.



**J. Conspiracy to injure / Unlawful means conspiracy**

**J.1 *The Conspiracy***

65. In around April 2024, the 1<sup>st</sup> to 20<sup>th</sup> Defendants fraudulently and wrongfully agreed and conspired expressly, tacitly, and/or by conduct to defraud the Plaintiff of his Stolen Bitcoin, and that:-

65.1. The 1<sup>st</sup> to 20<sup>th</sup> Defendants would induce the Plaintiff to download and install the Fake Bitpie Online App via the Fplash Runner 3D Online App and the associated Third Party Link by, *inter alia*, imitating the appearance and functions of the genuine Bitpie Online App and falsely verifying the legitimacy of the Fake Bitpie Online App through purported Verification.

65.2. The operators of the Fake Bitpie Online App and the subsequent recipients of the Plaintiff's Stolen Bitcoin (including those controlling the Final BTC Address, the Initial and Further TRON Addresses, the ETH Addresses, and the Initial THOR Addresses) would assist in laundering, dealing with, concealing and/or whitewashing the tainted and unlawful nature of the Plaintiff's Stolen Bitcoin; and/or

65.3. The aforesaid 1<sup>st</sup> to 20<sup>th</sup> Defendants would assist in (i) converting the Plaintiff's Stolen Bitcoin into other digital currencies as pleaded above; and/or (ii) dissipating the same through complex blockchain transactions for purposes wholly unrelated to any lawful transfer or custody of digital assets but to launder and conceal the illicit origin of P's Stolen Bitcoin to obstruct the Plaintiff's recovery efforts.

(collectively, the "**Conspiracy**")

66. Subject to further discovery and interrogatories, the Conspiracy is to be inferred from the matters pleaded in Sections D to F above and, in particular, the following fact(s), act(s), and/or omissions of the Defendant(s):-

### Particulars

- 66.1. The Fake Bitpie Online App was an illegal and fictitious application. It is designed to imitate a legitimate digital wallet, but was in fact a vehicle used to perpetuate online fraud and digital asset theft.
- 66.2. The Fake Bitpie Online App was not authorised by any legitimate financial or technology entity under PRC law and was not registered or approved for cryptocurrency operations within the PRC.
- 66.3. The operators of the Fake Bitpie Online App and/or the malicious Third Party Link were directly connected to an organised online fraud operation. The said fraud was executed via deceptive cloning and imitation of applications and interfaces of legitimate cryptocurrency platforms.
- 66.4. All of the P's Bitcoin assets were transferred to and received by blockchain addresses associated with no apparent commercial purpose or legitimate economic substance, as further pleaded in Section F above.
- 66.5. The subsequent movement of P's Stolen Bitcoin as pleaded in Section F above, was highly structured and indicative of a sophisticated money laundering operation. In particular, the cryptocurrency was rapidly received and transferred out of each receiving address within minutes or hours of receipt, characteristic of "layering" activity designed to obfuscate traceability.
- 66.6. The proceeds from P's Stolen Bitcoin were never used for any legitimate investment or commercial activity. The entire transfer scheme, as pleaded in Sections F above, runs contrary to the ordinary function of a cryptocurrency wallet and the expected terms of any lawful financial transaction or user agreement.
- 66.7. The operators of the Fake Bitpie Online App have failed to (i) return any portion of P's Stolen Bitcoin, or (ii) respond to any inquiries or remedial requests, despite *inter alia* the Plaintiff reporting the Fraud to law enforcement authorities in the PRC, and the Freezing Order.

- 66.8. Most, if not all, of the transfers pleaded in Section F above were gratuitous and devoid of consideration. The complex web of blockchain address hopping and token conversions was plainly intended to disguise the origin of the assets and defeat recovery.

***J.2 Intention to Injure***

67. The intention or predominant intention to injure the Plaintiff on the part of those involved in the Fraud (including but not limited the 1<sup>st</sup> to 20<sup>th</sup> Defendants) is to be inferred from the matters pleaded in Sections D to F above, and in particular from the following-

- 67.1. The fraudsters created or disseminated the Fake Bitpie Online App and/or the Third Party Link for the specific purpose of deceiving users in the PRC into transferring digital assets to addresses controlled by them, including the Plaintiff and P's Stolen Bitcoin.
- 67.2. The 1<sup>st</sup> to 20<sup>th</sup> Defendants orchestrated and executed a coordinated scheme involving a chain of cryptocurrency transfers across multiple blockchain networks and involving multiple cryptocurrencies, which were entirely gratuitous, circular, and economically inexplicable except as steps designed to defeat recovery and obscure tracing; and/or
- 67.3. The 1<sup>st</sup> to 20<sup>th</sup> Defendants knew, or were recklessly indifferent to the fact, that the logical and inevitable result of their acts would be to cause the Plaintiff to suffer substantial financial loss in respect of P's Stolen Bitcoin.

### ***J.3 Causation and Loss***

68. As a consequence of the matters pleaded above, the 1<sup>st</sup> to 20<sup>th</sup> Defendants committed the overt acts and/or omissions set out in this pleading, which were causative and facilitative of the fraud and the dissipation of P's Stolen Bitcoin.
69. The Plaintiff has thereby suffered loss and damage, to be assessed, including but not limited to the total value of P's Stolen Bitcoin.

### **K. Unjust Enrichment**

70. Further or alternatively, the 1<sup>st</sup> to 20<sup>th</sup> Defendants were unjustly enriched by, and are liable to make restitution to, the Plaintiff of the parts of P's Stolen Bitcoin and/or its traceable proceeds that they respectively received:-

70.1. The 1<sup>st</sup> to 20<sup>th</sup> Defendants were enriched by their receipt of P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes. Such enrichment was caused by a set of coordinated and/or sham transactions stemming from the transfer and laundering of P's Stolen Bitcoin and/or represented property in which the Plaintiff can trace an interest by reason of the matters pleaded above.

70.2. Such enrichment was at the expense of the Plaintiff, as P's Stolen Bitcoin was transferred from P's Bitpie Wallet.

70.3. The enrichment of the 1<sup>st</sup> to 20<sup>th</sup> Defendants was unjust, in that:-

- (1) The transfers of P's Stolen Bitcoin from the Plaintiff were made by mistake, as they were induced by the Fraud.
- (2) Further or alternatively, there was a total failure of consideration, in that there were no dealings between the Plaintiff and the 1<sup>st</sup> to 20<sup>th</sup> Defendants which would otherwise provide any reason to receive or

entitlement to the 1<sup>st</sup> to 20<sup>th</sup> Defendants to receive P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes.

- (3) Still further or alternatively, there was want of authority, in that there was a lack of genuine or legitimate commercial purpose for the transfers of P's Stolen Bitcoin and/or its traceable proceeds and/or substitutes, which was done without the authority or consent of the Plaintiff by reason of the Fraud.

**L. Interest**

71. Further, the Plaintiff is entitled to claim, and does claim, for interest (whether compound or simple) on such sums found due from him at such rate and for such period as this Honourable Court deems fit pursuant to sections 48 and 49 of the *High Court Ordinance* (Cap. 4) and/or the Court's equitable jurisdiction.

**AND THE PLAINTIFF CLAIMS AGAINST THE 1<sup>ST</sup> DEFENDANT**

- (1) A declaration that the 1<sup>st</sup> Defendant holds the sum of USDT 151,148.00 received in D1's Crypto Wallet on or around 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 1<sup>st</sup> Defendant to remit and/or transfer the sum of USDT 151,148.00 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (2) Restitution for the sum of USDT 151,148.00 (or any other sum that this Honourable Court deems fit);

**AND THE PLAINTIFF CLAIMS AGAINST THE 2<sup>ND</sup> DEFENDANT**

- (3) A declaration that the 2<sup>nd</sup> Defendant holds the sum of USDT 137,105.049792 received in D2's Crypto Wallet on or around 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 2<sup>nd</sup> Defendant to remit and/or transfer the sum of USDT 137,105.049792 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and

all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (4) Restitution for the sum of USDT 137,105.049792 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 3<sup>RD</sup> DEFENDANT

- (5) A declaration that the 3<sup>rd</sup> Defendant holds the sum of USDT 171,546.0 received in D3's Crypto Wallet on or around 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 3<sup>rd</sup> Defendant to remit and/or transfer the sum of USDT 171,546.0 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (6) Restitution for the sum of USDT 171,546.0 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 4<sup>TH</sup> DEFENDANT

- (7) A declaration that the 4<sup>th</sup> Defendant holds the sum of USDT 172,534.351146 received in D4's Crypto Wallet on or around 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 4<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 172,534.351146 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (8) Restitution for the sum of USDT 172,534.351146 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 5<sup>TH</sup> DEFENDANT

- (9) A declaration that the 5<sup>th</sup> Defendant holds the sum of USDT 169,412.488627 received in D5's Crypto Wallet on or around 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 5<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 169,412.488627 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (10) Restitution for the sum of USDT 169,412.488627 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 6<sup>TH</sup> DEFENDANT

- (11) A declaration that the 6<sup>th</sup> Defendant holds the sum of USDT 143,740.00 received in D6's Crypto Wallet on or around 7 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 6<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 143,740.00 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (12) Restitution for the sum of USDT 143,740.00 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 7<sup>TH</sup> DEFENDANT

- (13) A declaration that the 7<sup>th</sup> Defendant holds the sum of USDT 157,672.347256 received in D7's Crypto Wallet on or around 7 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 7<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 157,672.347256 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and

all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (14) Restitution for the sum of USDT 157,672.347256 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 8<sup>TH</sup> DEFENDANT

- (15) A declaration that the 8<sup>th</sup> Defendant holds the sum of USDT 160,642.181898 received in D8's Crypto Wallet on or around 7 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 8<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 160,642.181898 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (16) Restitution for the sum of USDT 160,642.181898 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 9<sup>TH</sup> DEFENDANT

- (17) A declaration that the 9<sup>th</sup> Defendant holds the sum of USDT 156,968.434456 received in D9's Crypto Wallet on or around on 7 April 2024 and 29 June 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 9<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 156,968.434456 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (18) Restitution for the sum of USDT 156,968.434456 (or any other sum that this Honourable Court deems fit);



AND THE PLAINTIFF CLAIMS AGAINST THE 10<sup>th</sup> DEFENDANT

- (19) A declaration that the 10<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D10's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 10<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (20) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 11<sup>th</sup> DEFENDANT

- (21) A declaration that the 11<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D11's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 11<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (22) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 12<sup>th</sup> DEFENDANT

- (23) A declaration that the 12<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D12's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 12<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its

traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (24) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 13<sup>th</sup> DEFENDANT

- (25) A declaration that the 13<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D13's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 13<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (26) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 14<sup>th</sup> DEFENDANT

- (27) A declaration that the 14<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D14's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 14<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (28) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 15<sup>th</sup> DEFENDANT

- (29) A declaration that the 15<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D15's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 15<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (30) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 16<sup>th</sup> DEFENDANT

- (31) A declaration that the 16<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D16's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 16<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (32) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 17<sup>th</sup> DEFENDANT

- (33) A declaration that the 17<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D17's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 17<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and

all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (34) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 18<sup>th</sup> DEFENDANT

- (35) A declaration that the 18<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D18's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 18<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (36) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 19<sup>th</sup> DEFENDANT

- (37) A declaration that the 19<sup>th</sup> Defendant holds the sum of USDT 149,323.75 received in D19's Crypto Wallet on or around on 8 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 19<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 149,323.75 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;

- (38) Restitution for the sum of USDT 149,323.75 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE 20<sup>th</sup> DEFENDANT

- (39) A declaration that the 20<sup>th</sup> Defendant holds the sum of USDT 1,234,973.0867 received in D20's Crypto Wallet on or around on 30 April 2024 (or its traceable proceeds and/or substitutes) on constructive trust (or resulting trust) for the Plaintiff, and an order for the 20<sup>th</sup> Defendant to remit and/or transfer the sum of USDT 1,234,973.0867 (or its traceable proceeds and/or substitutes) held on trust for the Plaintiff to the Plaintiff, and all necessary accounts and inquiries to enable the Plaintiff to trace and recover the same;
- (40) Restitution for the sum of USDT 1,234,973.0867 (or any other sum that this Honourable Court deems fit);

AND THE PLAINTIFF CLAIMS AGAINST THE DEFENDANTS:

- (41) An order for account of profits and/or equitable compensation (to be assessed);
- (42) Damages (to be assessed);
- (43) Interest;
- (44) Costs; and
- (45) Further and/or other reliefs.

Dated this 18<sup>th</sup> day of January 2026

**JOSHUA YEUNG**  
Counsel for the Plaintiff

*Eric Chow & Co*  
**ERIC CHOW & CO.**  
Solicitors for the Plaintiff

### Statement of Truth

I, LIU Dan, the Plaintiff, believe that the facts stated in this Statement of Claim dated the 15<sup>th</sup> day of January 2026 are true.

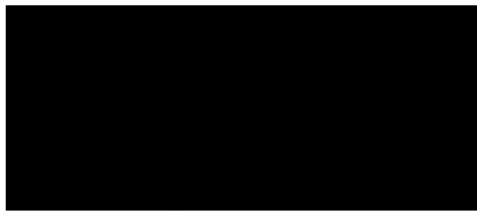
Date: 15<sup>th</sup> January 2026



---

**LIU Dan**

I certify that I, Wong Oi Ki, of Eric Chow & Co., Solicitors for the Plaintiff, 3401, Alexandra House, 18 Chater Road, Central, Hong Kong, have translated the contents of this document and the statement of truth to the person signing the statement of truth above who appeared to understand (a) the document and approved its content as accurate and (b) the Statement of Truth and the consequences of making a false statement.



Date: 15<sup>th</sup> January 2026

申索性質:

A. \* 金錢申索/非金錢申索/混合申索

B.

表格 1

傳訊令狀

(第 6 號命令第 1 條規則)

HCA

/ 2026

香港特別行政區

高等法院

原訟法庭

高院民事訴訟 2026 年第

號

原告人

及

被告人

致被告人(姓名或名稱)\_\_\_\_\_ (地址)\_\_\_\_\_

本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送達認收書交回高等法院登記處，並在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認收書，或如你交回送達認收書但沒有在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認收書的指示，填寫適當的附上的表格。]

本令狀於今天，即 20\_\_\_\_年\_\_\_\_月\_\_\_\_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

關於送達認收書的指示載於隨附的表格。



\*[申索陳述書]

原告人就下述各項提出申索

---

\* 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。)

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。)

本令狀是由代表上述原告人的\_\_\_\_\_律師事務所發出，其地址為\_\_\_\_\_，而該原告人的地址則為\_\_\_\_\_。

\*(或凡原告人是親自起訴者。

本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。”

No. 14  
**Acknowledgment of Service of Writ of Summons**  
(O. 12 r. 3)

*Directions for Acknowledgment of Service*

1. The accompanying form of 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 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 a Statement of Claim is indorsed on the Writ (i.e. the words “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 Writ, unless in the meantime a summons for judgment is served on the Defendant.

If a Statement of Claim is not indorsed on the Writ, the Defence must be filed and served within 28 days after a 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 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.

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an 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, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him and a 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 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.

表格 14  
傳訊令狀送達認收書  
(第 12 號命令第 3 條規則)

關於送達認收書的指示

1. 隨附的送達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，則應由被告人士撕下及填寫。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)。

如令狀註有申索陳述書(即在背頁上端出現“申索陳述書”等字)，則除非在對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。

令狀並無註有申索陳述書，則必須在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。

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(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(.....)之名稱營業”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。



**IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026**

LIU DAN

Plaintiff

and

- |   |                            |
|---|----------------------------|
| The holder of the electronic cryptocurrency wallet with the Tron address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn  | 1 <sup>st</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH | 2 <sup>nd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az | 3 <sup>rd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM | 4 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b | 5 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z | 6 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDYNY1oXZMCkPUuLMBqe4D64xm46nd4bLm | 7 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2 | 8 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk | 9 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M | 10 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya | 11 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL | 12 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6 | 13 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ | 14 <sup>th</sup> Defendant |

The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

### **ACKNOWLEDGMENT OF SERVICE OF 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 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 Writ of Summons.

Where words  
appear between  
square brackets,  
delete if  
inapplicable

Service of the 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.

**ERIC CHOW & CO.**  
*Solicitors for the Plaintiff*  
3401, Alexandra House  
18 Chater Road, Central, Hong Kong  
Tel: 2151 5150 Fax: 2151 5158  
Ref.: CL/LY/203608252544



**IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026**

LIU DAN

Plaintiff

and

The holder of the electronic cryptocurrency wallet with the Tron  
address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn

1<sup>st</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TRznt2uknCUdWWkMDMtfgnmlgrQ9cfZkrH

2<sup>nd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az

3<sup>rd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM

4<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b

5<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z

6<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TDYNY1oXZMCkPUuLMBqe4D64xm46nd4bLm

7<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2

8<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk

9<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M

10<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya

11<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL

12<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6

13<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ

14<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6

15<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN

16<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb

17<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP

18<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL

19<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD

20<sup>th</sup> Defendant

### **ACKNOWLEDGMENT OF SERVICE OF 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 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 Writ of Summons.

Where words  
appear between  
square brackets,  
delete if  
inapplicable

Service of the 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.

**ERIC CHOW & CO.**  
*Solicitors for the Plaintiff*  
3401, Alexandra House  
18 Chater Road, Central, Hong Kong  
Tel: 2151 5150 Fax: 2151 5158  
Ref.: CL/LY/203608252544

**IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026**

LIU DAN

Plaintiff

and

- |   |                            |
|---|----------------------------|
| The holder of the electronic cryptocurrency wallet with the Tron address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn  | 1 <sup>st</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH | 2 <sup>nd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az | 3 <sup>rd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM | 4 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b | 5 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z | 6 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDYNY1oXZMCKPUuLMBqe4D64xm46nd4bLm | 7 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2 | 8 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk | 9 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M | 10 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEc5mBqfqNtySNya  | 11 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL | 12 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6 | 13 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ | 14 <sup>th</sup> Defendant |

The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y3lw6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

### **ACKNOWLEDGMENT OF SERVICE OF 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 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 Writ of Summons.

Where words  
appear between  
square brackets,  
delete if  
inapplicable

Service of the 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.

**ERIC CHOW & CO.**

*Solicitors for the Plaintiff*

3401, Alexandra House

18 Chater Road, Central, Hong Kong

Tel: 2151 5150 Fax: 2151 5158

Ref.: CL/LY/203608252544

高院民事訴訟 2026 年第

號

原告人

及

被告人

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. 述明對令狀作認收送達或由他人代為對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)

44

口 香

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)。


☐ 否

如擬作出承認，被告人可藉填寫隨附於傳訊令狀的表格 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。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於香港，則必須填上一個給予他的通訊所應送交的香港地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。

周俊軒律師事務所

原告人律師

香港中環遮打道 18 號歷山大廈 3401 室

電話：2151 5150

傳真: 2151 5158

檔案編號: CL/LY/203608252544

香港特別行政區  
高等法院  
原訟法庭

高 院 民 事 訴 訟 2026 年 第

號

原告人

及

被告人

### 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. 述明對令狀作認收送達或由他人代為對令狀作認收送達的  
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。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於香港，則必須填上一個給予他的通訊所應送交的香港地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。

周俊軒律師事務所

原告人律師

香港中環遮打道 18 號歷山大廈 3401 室

電話：2151 5150

傳真：2151 5158

檔案編號：CL/LY/203608252544



香港特別行政區  
高等法院  
原訟法庭

高 院 民 事 訴 訟 2026 年 第

號

原告人

及

被告人

### 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. 述明對令狀作認收送達或由他人代為對令狀作認收送達的  
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。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於香港，則必須填上一個給予他的通訊所應送交的香港地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。

周俊軒律師事務所

原告人律師

香港中環遮打道 18 號歷山大廈 3401 室

電話：2151 5150

傳真：2151 5158

檔案編號：CL/LY/203608252544

香港特別行政區  
高等法院  
原訟法庭  
高 院 民 事 訴 訟 2026 年 第 號

原告人

及

被告人

---

傳訊令狀

---

發出日期: 2026 年 月 日

周俊軒律師事務所  
原告人律師  
香港中環遮打道 18 號歷山大廈 3401 室  
電話: 2151 5150  
傳真: 2151 5158  
檔案編號: CL/LY/203608252544

**Admission (liquidated amount)**

(O. 13A rr. 4(2), 5(2) &amp; 13(2))

HCA

82

/ 2026

IN THE HIGH COURT OF THE  
HONG KONG SPECIAL ADMINISTRATIVE REGION  
COURT OF FIRST INSTANCE  
ACTION NO. 82 OF 2026

LIU DAN

Plaintiff

and

The holder of the electronic cryptocurrency wallet with the Tron  
address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn

1<sup>st</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH

2<sup>nd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az

3<sup>rd</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM

4<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b

5<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z

6<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TDYNY1oXZMCKPUuLMBqe4D64xm46nd4bLm

7<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2

8<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk

9<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M

10<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TAhKoLhdr2YTVcN7yfEcG5mBqfqNtySNya

11<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL

12<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron  
address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6

13<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ	14 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

#### Explanatory Note

- 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 –
  - within the period for service of your defence if you have been served with a writ; *or*
  - the period for filing of your affidavit evidence if you have been served with an originating summons; *or*
  - within 14 days after service of the originating process in any other case.
- 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.
- If you do not ask for time to pay, the plaintiff will decide how much and when you should pay.
- If you ask for time to pay, the plaintiff will decide whether or not to accept your proposal for payment.
- 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.
- If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
  - the information set out in this form;
  - the reasons why the plaintiff does not accept your proposal for payment; and
  - all other relevant matters.
- 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**

months

years

☐ **I am a pensioner**

**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 (give details below)		
	\$	per month
	\$	per month
	\$	per month
<b>Total income</b>	<b>\$</b>	<b>per month</b>

## 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 ( <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
<b>Total expenses</b>	<b>\$ per month</b>

## 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 ( <i>give details below</i> )	
	\$
	\$
<b>Total liabilities</b>	<b>\$</b>

**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.

表格 16  
承認(經算定款額)  
(第 13A 號命令第 4(2)、5(2)及 13(2)條規則)

HCA 82 /2026

香港特別行政區  
高等法院  
原訟法庭

高院民事訴訟 2026 年第

82

號

LIU DAN

Plaintiff

and

- |   |                            |
|---|----------------------------|
| The holder of the electronic cryptocurrency wallet with the Tron address TYJ6cUCbETyjuFREo9hMPtXWZzAAWx3DYn | 1 <sup>st</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH | 2 <sup>nd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az | 3 <sup>rd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM | 4 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b | 5 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z | 6 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDYNY1oXZMCkPUuLMBqe4D64xm46nd4bLm | 7 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2 | 8 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk | 9 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M | 10 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcG5mBqfqNtySNya | 11 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL | 12 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6 | 13 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ | 14 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6 | 15 <sup>th</sup> Defendant |

The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN

16<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ9lcATozQxtXiVoqBG9pyb

17<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP

18<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL

19<sup>th</sup> Defendant

The holder of the electronic cryptocurrency wallet with ETH blockchain address  
0x1020508c8b9FfA57172901114F64FC4D4992BfcD

20<sup>th</sup> Defendant

**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。

HCA

82 / 2026

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

ACTION NO. 82 OF 2026

BETWEEN

LIU DAN

Plaintiff

and

- |   |                            |
|---|----------------------------|
| The holder of the electronic cryptocurrency wallet with the Tron address TYJ6cUCbETyufreo9hMPtXWZzAAWx3DYn  | 1 <sup>st</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TRznt2uknCUdWWkMDMtfgnm1grQ9cfZkrH | 2 <sup>nd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TFZXDYhEi89bQuSWjmVoq6qc33ybrGB1Az | 3 <sup>rd</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TNnvsdeLPvccsV3xVFJHojWv2kGuv4F2nM | 4 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TEt4fxNPF1NGo9d8JbnYoqRsdYVJno3J2b | 5 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TVd9GhBawj4F9eA1dhiM4JFPKYVW9mef5z | 6 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDYNY1oXZMCKPUuLMBqe4D64xm46nd4bLm | 7 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TYF4TbdMQ8bbtGgGjUxkMcc2U6witLQjo2 | 8 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TDptPDG9sXnLJfrefoBVkGfQyL4UzUhUzk | 9 <sup>th</sup> Defendant  |
| The holder of the electronic cryptocurrency wallet with the Tron address TLapWJeJCemDnkm2i2ZPC7PFV6gQ9Pnr7M | 10 <sup>th</sup> Defendant |
| The holder of the electronic cryptocurrency wallet with the Tron address TAhKoLhdr2YTVcN7yfEcq5mBqfqNtySNya | 11 <sup>th</sup> Defendant |

The holder of the electronic cryptocurrency wallet with the Tron address TPmwhJgxPBvL1DRhG4TFAfCcxU7D6kXYeL	12 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TStpKCL6F492EsYuPwtaBh8RjgH3smZGG6	13 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TBpd3KreoaLP6Rk3qaeFBTzyP9xck3FjnQ	14 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TSF2adYcmivMgf8Y31w6rmwhNzpfSSoEA6	15 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TRZonQC3DVYNn7biZpX1U3eveMtGRixvpN	16 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TXd1PLXApK7MJ91cATozQxtXiVoqBG9pyb	17 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address THHb16mPT5eYd9Hap6y8TLArqodHNzQsmP	18 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with the Tron address TVBGc7kn1HV1MBARRjKgTjDP5trSXTXvaL	19 <sup>th</sup> Defendant
The holder of the electronic cryptocurrency wallet with ETH blockchain address 0x1020508c8b9FfA57172901114F64FC4D4992BfcD	20 <sup>th</sup> Defendant

---

~~STATEMENT OF CLAIM~~  
**WRIT OF SUMMONS**

---

Dated the 16<sup>th</sup> day of January 2026

Filed on the 16<sup>th</sup> day of January 2026

**ERIC CHOW & CO.**  
*Solicitors for the Plaintiff*  
3401, Alexandra House  
18 Chater Road, Central, Hong Kong  
Tel: 2151 5150 Fax: 2151 5158  
Ref.: CL/LY/203608252544