

1 Michael Burshteyn (SBN 295320)
Michael.Burshteyn@gtlaw.com
2 Kristin O'Carroll (SBN 312902)
kristin.ocarroll@gtlaw.com
3 **GREENBERG TRAURIG, LLP**
101 Second Street, Suite 2200
4 San Francisco, CA 94105
Telephone: 415.655.1300
5 Facsimile: 415.707.2010

6 Arda Goker (*pro hac vice*)
Arda.Goker@gtlaw.com
7 **GREENBERG TRAURIG, P.A.**
450 South Orange Avenue, Suite 650
8 Orlando, FL 32801
Telephone: 407.420.1000
9 Facsimile: 407.420.5909

10
11 *Attorneys for Plaintiff*
12 *NIBI, INC.*

13
14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 NIBI, INC.,
17 Plaintiff,
18 v.
19 JOHN DOE, ET AL.,
20 Defendants.

CASE NO. 5:24-cv-06184-EKL

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S *EX PARTE* MOTION TO
EXPEDITE DISCOVERY AND FOR AN
ORDER AUTHORIZING ALTERNATIVE
SERVICE**

1 Having considered Plaintiff's *Ex Parte* Motion to Expedite Discovery and for an Order Authorizing
 2 Alternative Service ("Motion"), any statements or declarations submitted in support of the Motion, and
 3 counsel's arguments at the hearing on the Motion held on December 18, 2024, this Court hereby rules as
 4 follows:

5 **Expedited Discovery**

6 The Court grants Plaintiff Nibi, Inc.'s request to serve expedited discovery on third parties
 7 identified in its motion. Plaintiff may serve the proposed third-party subpoenas conditionally filed under
 8 seal (ECF Nos. 18-3, 18-7, 18-8, 18-9, 18-10, 18-11, 18-12, 18-13, 18-14).

9 Each proposed subpoena recipient shall have 30 days from service of the subpoena to object to or
 10 move to quash the subpoena.

11 Plaintiff may use the information identifying potential John Doe Defendants disclosed in response
 12 only to pursue its claims and rights related to the spoofing attack against Plaintiff, as alleged in the operative
 13 Complaint.

14 **NFT Service:**

15 The Court grants Plaintiff's request for leave to serve the Doe Defendants via NFT on the 3
 16 addresses identified during Plaintiff's investigation into the incident, as enumerated in Paragraph 3 of the
 17 Declaration of Julia Hardy (ECF No. 20 at ¶3.)

18 Plaintiff shall serve on these addresses an NFT which contains a notice of this action with summons
 19 language and a hyperlink to <https://nibiru.fi/docs/community/legal/2024-nibi-v-doe.html>, a specially
 20 created website that includes (a) a notice of this action, (b) a hyperlink to the summons and Complaint, and
 21 (c) all filings and orders in this action.

22 The NFT shall display on its face an image that includes the summons in this action when delivered
 23 to the addresses identified above.

24 Plaintiff shall mitigate the risk that the Doe Defendants will perceive the NFT as a scam or attempt
 25 to hack by including with the NFT messaging indicating that the NFT is effectuating service of official
 26 court documents.

27 DATED: _____, 20____

 United States District Court Judge