

Russell Rope
Petitioner In Pro Per
ID 1607 POB 1198
Sacramento, CA 95812
justice@russellrope.com
(310) 663-7655

**IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT**

RUSSELL ROPE,
Petitioner,

vs.

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF LOS ANGELES,**
Respondent,

COINBASE, INC.,
Real Party in Interest.

Case No. _____
Trial Court Case No. 25STCV16692
Hon. Rupert A. Byrdsong, Dept. 28

APPENDIX - EXHIBIT VOLUME 1 OF 4

Rope v. Coinbase – Appendix - Exhibit Volume 1 of 4 – Page 1 of 2

TABLE OF EXHIBITS

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★ = Key Exhibits Most Relevant to Issues Presented in Petition

VOLUME 1:

- ★**A** — Minute Order Compelling Arbitration + Stay
- ★**B** — Defendant's Notice of Ruling + Proof of Service
- ★**C1** — Timeline; **C2** — Register of Actions (ROA)
- ★**D** — Verified Complaint + Declaration + Exhibits
- E1** — Plaintiff's Discovery (*Stayed by Arbitration Order*) Requests for Admission;
- E2** — Production; **E3** — Special Interrogatories; **E4** — Deposition Notice
- F1** — Plaintiff's Motions (*Stayed by Arbitration Order*) for Claim & Delivery;
- F2** — Protective Order; **F3** — Sanctions; **F4** — Referral Law Enforcement

VOLUME 2:

- ★**G1** — Defendant: Petition to Compel Arbitration; **G2** — Declaration (Petrick) + Exhibits;
- G3** — Declaration (Nacoste) + Exhibits; **G4** — Request for Judicial Notice

VOLUME 3:

- ★**H1** — Opposition to Petition for Arbitration + Declaration & Exhibits; **H2** — Ex Parte Stay
- ★**I** — Plaintiff's Evidentiary Objections to Defendant's Arbitration Evidence
- J** — Defendant's Response to Plaintiff's Evidentiary Objections

VOLUME 4:

- K1** — Request for Statement of Decision by Defendant; ★**K2** — Also by Plaintiff
- L1** — Plaintiff's Notice of Intent; **L2** — Request for Immediate Entry / Clarification
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- ★**N** — Plaintiff's Declaration Summarizing Hearing
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EXHIBIT A

Minute Order
Compelling Arbitration + Stay

Dated: November 26, 2025

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 28

25STCV16692

RUSSELL ROPE vs COINBASE, INC.

November 26, 2025

8:30 AM

Judge: Honorable Rupert A. Byrdsong

Judicial Assistant: A. Robledo

Courtroom Assistant: S. Brown

CSR: Cheri Bullock, CSR# 4714

ERM: None

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): Russell Rope Pro Per present in the courtroom

For Defendant(s): Josephine Petrick and Celine Purcell appearing for Emily Kirk (Telephonic)

NATURE OF PROCEEDINGS: Hearing on Petition to Compel Arbitration and to Stay Proceedings (6039); Case Management Conference

Pursuant to Government Code sections 68086, 70044, and California Rules of Court, rule 2.956, Cheri Bullock, CSR # 4714, certified shorthand reporter is appointed as an official Court reporter pro tempore in these proceedings, and is ordered to comply with the terms of the Court Reporter Agreement. The Order is signed and filed this date.

The matter is called for hearing.

The Court has read and considered the moving papers.

The Court gives its oral tentative ruling and hears argument from the parties.

After consideration of all documents filed and oral argument, the Court adopts the tentative as the order of the Court.

The Petition DEFENDANT COINBASE, INC.S NOTICE OF PETITION AND PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES filed by Coinbase, Inc. on 08/20/2025 is Granted.

The case is ordered stayed pending binding arbitration as to the entire action.

All other scheduled hearings set in this department are ordered vacated.

Post-Arbitration Status Conference is scheduled for 03/25/2027 at 08:30 AM in Department 28 at Stanley Mosk Courthouse.

Counsel for the Defendant is to give notice and file proof of such.

EXHIBIT B

Notice of Ruling & Proof of Service

Dated: December 1, 2025

Josephine Petrick (SBN 280233)
jpetrick@nortonlaw.com
Celine G. Purcell (SBN 305158)
cpurcell@nortonlaw.com
Emily Kirk (SBN 348547)
ekirk@nortonlaw.com
THE NORTON LAW FIRM PC
300 Frank H. Ogawa Plaza, Suite 450
Oakland, CA 94612
Telephone: (510) 906-4900

Attorneys for Defendant
COINBASE, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

RUSSELL ROPE, an individual,

Plaintiff,

v.

COINBASE, INC., & DOES 1 through 20,

Defendant.

Case No. 25STCV16692

**NOTICE OF RULING ON DEFENDANT
COINBASE, INC.'S PETITION TO COMPEL
ARBITRATION AND MOTION TO STAY
PROCEEDINGS**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 26, 2025 at 8:30 a.m. in Department 28 of the above-entitled Court, located at 111 N. Hill Street, Los Angeles, California 90012, the Honorable Rupert A. Byrdsong, presiding, the Court held a hearing for Defendant Coinbase, Inc.'s ("Coinbase") Petition to Compel Arbitration and Motion to Stay Proceedings ("Petition") in the above referenced matter.

Plaintiff Russell Rope appeared in *Propria Persona* on his own behalf.

Coinbase appeared through its counsel Josephine Petrick and Celine G. Purcell appearing for defendant Coinbase, Inc.

After considering the Petition to Compel Arbitration and Motion to Stay Proceedings, other papers submitted in support of the Petition, as well as Plaintiff's opposition papers, the Court ruled as follows:

1. The Petition to Compel Arbitration and Motion to Stay Proceedings filed by Coinbase, Inc. on 8/20/2025 is Granted.
2. The case is ordered stayed pending binding arbitration as to the entire action.
3. All other scheduled hearings set in this department are ordered vacated.
4. Post-Arbitration Status Conference is scheduled for 3/25/2027 at 8:30 a.m. in Department 28 at Stanley Mosk Courthouse.
5. Counsel for the Defendant is to give notice and file proof of such.

A copy of the order entered on 11/26/2025 is attached hereto as Exhibit A.

Dated: December 1, 2025

Respectfully submitted,

THE NORTON LAW FIRM PC

/s/ Celine G. Purcell

Celine G. Purcell
Attorneys for Defendant
COINBASE, INC.

Exhibit A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 28

25STCV16692

RUSSELL ROPE vs COINBASE, INC.

November 26, 2025

8:30 AM

Judge: Honorable Rupert A. Byrdsong

Judicial Assistant: A. Robledo

Courtroom Assistant: S. Brown

CSR: Cheri Bullock, CSR# 4714

ERM: None

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): Russell Rope Pro Per present in the courtroom

For Defendant(s): Josephine Petrick and Celine Purcell appearing for Emily Kirk (Telephonic)

NATURE OF PROCEEDINGS: Hearing on Petition to Compel Arbitration and to Stay Proceedings (6039); Case Management Conference

Pursuant to Government Code sections 68086, 70044, and California Rules of Court, rule 2.956, Cheri Bullock, CSR # 4714, certified shorthand reporter is appointed as an official Court reporter pro tempore in these proceedings, and is ordered to comply with the terms of the Court Reporter Agreement. The Order is signed and filed this date.

The matter is called for hearing.

The Court has read and considered the moving papers.

The Court gives its oral tentative ruling and hears argument from the parties.

After consideration of all documents filed and oral argument, the Court adopts the tentative as the order of the Court.

The Petition DEFENDANT COINBASE, INC.S NOTICE OF PETITION AND PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES filed by Coinbase, Inc. on 08/20/2025 is Granted.

The case is ordered stayed pending binding arbitration as to the entire action.

All other scheduled hearings set in this department are ordered vacated.

Post-Arbitration Status Conference is scheduled for 03/25/2027 at 08:30 AM in Department 28 at Stanley Mosk Courthouse.

Counsel for the Defendant is to give notice and file proof of such.

PROOF OF SERVICE

I am employed in the City of Oakland, State of California. I am over 18 years of age and not a party to this action. My business address is 300 Frank H. Ogawa Plaza, Suite 450, Oakland, CA 94612.

On the date below I served a true copy of the following document(s):

- **NOTICE OF RULING ON DEFENDANT COINBASE, INC.’S PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS**

on the parties listed below by the following means:

(BY U.S. MAIL) By placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the business’s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

(BY E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable period of time, after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Russell Rope
ID 1607 POB 1198
Sacramento, CA 95812
310-663-7655
justice@russellrope.com

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Dated: December 1, 2025

/s/ Jacob Bedwell
Jacob Bedwell

EXHIBIT C1

Timeline

Chronology of Most Relevant Events

Dated: March 10, 2026

Russell Rope
Petitioner In Pro Per
ID 1607 POB 1198
Sacramento, CA 95812
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**IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
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RUSSELL ROPE,
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**SUPERIOR COURT OF CALIFORNIA,
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Respondent,

COINBASE, INC.,
Real Party in Interest.

*Trial Court Case No. 25STCV16692
Hon. Rupert A. Byrdsong, Dept. 28*

PROCEDURAL TIMELINE

Rope v. Coinbase – Exhibit C1: Procedural Timeline – 1 of 6

EXHIBIT C1 | PROCEDURAL TIMELINE

Rope v. Coinbase, Inc. – Los Angeles Superior Court – Case No. 25STCV16692

2023

Petitioner Russell Rope opened a Coinbase account via the Coinbase mobile application and completed identity verification.

April 2025

Coinbase restricted Petitioner’s access to the account associated with Petitioner’s Web3 Wallet and required additional biometric verification that had not been part of the original account setup.

June 2025

Petitioner filed the Verified Complaint in Los Angeles Superior Court alleging interference with property, claim and delivery, and related claims concerning digital assets and account access.

June 2025

Petitioner filed an **Ex Parte Application for Temporary Restraining Order and Claim and Delivery**

seeking emergency relief to prevent loss or impairment of digital assets associated with Petitioner's Coinbase Web3 Wallet.

July 2025

The Superior Court denied the requested Temporary Restraining Order.

Petitioner filed petitions for writ of mandate in the California Court of Appeal seeking review of the denial of the TRO.

The Court of Appeal and California Supreme Court denied relief.

Mid-2025

Petitioner initiated litigation activity in the Superior Court including:

- Notice of intent to issue subpoenas
 - Preparation for discovery
 - Requests for emergency relief related to threatened loss of digital assets
-

August 20, 2025

Coinbase filed a Petition to Compel Arbitration.

September 23, 2025

Petitioner filed:

- Opposition to Petition to Compel Arbitration
 - Supporting declaration and exhibits
 - Evidentiary objections to Coinbase’s submitted materials.
-

November 25, 2025

Both parties filed Requests for Statement of Decision regarding the arbitration ruling.

November 26, 2025

The Superior Court issued a **Minute Order granting Coinbase’s Petition to Compel Arbitration and staying the action.**

December 1, 2025

Coinbase served **Notice of Ruling** regarding the November 26 order.

December 4, 2025

Petitioner filed:

- Notice of Intent to seek further review
 - Request for Immediate Entry / Clarification of Statement of Decision.
-

December 2025 – February 2026

Petitioner sought status updates regarding the requested Statement of Decision and continued to experience inability to access digital assets associated with the locked Web3 wallet as well as ongoing harm connected to and suffered from racketeering documented in RICO complaints.

March 2026

Petitioner completes preparation of approximately 650 pages of legal documents and files **Petition for Writ of Mandate** in the California Court of Appeal challenging the order compelling arbitration.

Purpose of Timeline

This timeline summarizes the key procedural events reflected in the record and the Register of Actions to assist the Court of Appeal in reviewing the sequence of filings and rulings relevant to the challenged arbitration order.

Respectfully submitted,

Dated: March 10, 2026

/s/ Russell Rope

Petitioner In Pro Per
justice@russellrope.com

EXHIBIT C2

Register of Actions (ROA)
lacourt.ca.gov

Dated: March 4, 2026



Language Access

English ▼

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CASE INFORMATION: 25STCV16692

Case Title: RUSSELL ROPE VS COINBASE, INC.

Filing Courthouse: Stanley Mosk Courthouse

Filing Date: 6/10/2025

Case Type: Other Complaint (non-tort/non-complex) (General Jurisdiction)

Status: Pending

[Click here to access document images for this case.](#)

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page

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FUTURE HEARINGS

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3/25/2027	08:30	Department 28	111 North Hill Street, Los Angeles, CA 90012	Post-Arbitration Status Conference
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PARTY INFORMATION

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COINBASE INC.	Defendant
KIRK EMILY	Attorney for Defendant
PETRICK JOSEPHINE KENDRA	Attorney for Defendant
ROPE RUSSELL	Plaintiff

DOCUMENTS FILED

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12/4/2025	Notice PLAINTIFFS NOTICE OF INTENT TO SEEK RECONSIDERATION &/OR EXTRAORDINARY WRIT RELIEF REGARDING ORDER GRANTING PETITION TO COMPEL ARBITRATION	Filed by Russell Rope (Plaintiff)
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12/4/2025	Request FOR IMMEDIATE ENTRY OF STATEMENT OF DECISION REGARDING ORDER GRANTING PETITION TO COMPEL ARBITRATION (CCP 632 ; CRC 3.1590)	Filed by Russell Rope (Plaintiff)
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12/1/2025	Notice of Ruling	Filed by Coinbase, Inc. (Defendant)
11/26/2025	Minute Order (Hearing on Petition Petition to Compel Arbitration and to Sta...)	Filed by Clerk
11/26/2025	Order Appointing Court Approved Reporter as Official Reporter Pro Tempore By: Cheri Bullock, CSR# 4714	Filed by Coinbase, Inc. (Defendant)
11/25/2025	Request for Statement of Decision	Filed by Coinbase, Inc. (Defendant)
11/25/2025	Response to Defendants Request for Statement of Decision	Filed by Russell Rope (Plaintiff)
11/19/2025	Response DEFENDANT COINBASE, INC.S RESPONSE TO PLAINTIFF ROPES EVIDENTIARY OBJECTIONS AND OTHER FILINGS RE: COINBASES PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS	Filed by Coinbase, Inc. (Defendant)
11/12/2025	Declaration Corrected	Filed by Russell Rope (Plaintiff)
11/12/2025	Declaration Supplemental Declaration of Authentication of Exhibits	Filed by Russell Rope (Plaintiff)
11/12/2025	Objection Notice & Request	Filed by Russell Rope (Plaintiff)
11/12/2025	Proof of Service (not Summons and Complaint)	Filed by Russell Rope (Plaintiff)
11/12/2025	Proof of Service (not Summons and Complaint)	Filed by Russell Rope (Plaintiff)
11/12/2025	Request Stay Modification	Filed by Russell Rope (Plaintiff)
11/12/2025	Response to Petition TO DEFENDANT COINBASE, INC.?S REPLY IN SUPPORT OF PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS	Filed by Russell Rope (Plaintiff)
11/12/2025	Response to Petition TO DEFENDANT OBJECTIONS TO DISCOVERY	Filed by Russell Rope (Plaintiff)
11/7/2025	Declaration Declaration of Josephine Petrick in Support of Defendant Coinbase, Inc.'s Reply in Support of Petition to Compel Arbitration and to Stay Proceedings	Filed by Coinbase, Inc. (Defendant)
11/7/2025	Proof of Service (not Summons and Complaint)	Filed by Coinbase, Inc. (Defendant)
11/7/2025	Reply Reply in Support of Petition to Compel Arbitration and Motion to Stay Proceedings	Filed by Coinbase, Inc. (Defendant)
10/27/2025	Notice of Appearance	Filed by Coinbase, Inc. (Defendant)
10/6/2025	Notice of Ruling	Filed by Coinbase, Inc. (Defendant)
10/2/2025	Minute Order (Hearing on Ex Parte Application To Stay Proceedings)	Filed by Clerk
10/1/2025	Declaration of Russell Rope in Support of Opposition to Defendant's Ex Parte App to Stay Proceeding	Filed by Russell Rope (Plaintiff)
10/1/2025	Declaration in Support of Ex Parte Application	Filed by Coinbase, Inc. (Defendant)

10/1/2025	Ex Parte Application To Stay Proceedings	Filed by Coinbase, Inc. (Defendant)
10/1/2025	Memorandum Notice of and Memorandum of Points and Authorities In Support of Ex Parte Application to Stay Proceedings	Filed by Coinbase, Inc. (Defendant)
10/1/2025	Opposition To Defendant's Ex Parte Application to Stay Proceedings	Filed by Russell Rope (Plaintiff)
10/1/2025	Proof of Service (not Summons and Complaint)	Filed by Coinbase, Inc. (Defendant)
10/1/2025	Proof of Service (not Summons and Complaint)	Filed by Russell Rope (Plaintiff)
9/30/2025	Proof of Service (not Summons and Complaint)	Filed by Russell Rope (Plaintiff)
9/30/2025	Supplemental Declaration In Support Of Case Management Statement	Filed by Russell Rope (Plaintiff)
9/29/2025	Declaration in Support of Motion for Claim & Delivery	Filed by Russell Rope (Plaintiff); Coinbase, Inc. (Defendant)
9/29/2025	Declaration in Support of Motion for Protective Order	Filed by Russell Rope (Plaintiff)
9/29/2025	Declaration in Support of Motion for Referral to Law Enforcement	Filed by Russell Rope (Plaintiff)
9/29/2025	Declaration in Support of Motion for Sanctions	Filed by Russell Rope (Plaintiff)
9/29/2025	Motion for Order Claim & Delivery	Filed by Russell Rope (Plaintiff)
9/29/2025	Motion for Order Referral to Law Enforcement	Filed by Russell Rope (Plaintiff)
9/29/2025	Motion for Protective Order	Filed by Russell Rope (Plaintiff)
9/29/2025	Motion for Sanctions	Filed by Russell Rope (Plaintiff)
9/25/2025	Proof of Service (not Summons and Complaint)	Filed by Russell Rope (Plaintiff)
9/23/2025	Case Management Statement	Filed by Coinbase, Inc. (Defendant)
9/23/2025	Case Management Statement	Filed by Russell Rope (Plaintiff)
9/23/2025	Declaration of Russell Rope in Support of Opposition to Arbitration & Stay	Filed by Russell Rope (Plaintiff)
9/23/2025	Opposition to Defendant's Petition to Compel Arbitration & Stay Proceedings	Filed by Russell Rope (Plaintiff)
9/23/2025	Proof of Personal Service	Filed by Russell Rope (Plaintiff)
8/20/2025	Declaration OF JERRY NACOSTE IN SUPPORT OF DEFENDANT COINBASE, INC.S PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS	Filed by Coinbase, Inc. (Defendant)

6/26/2025	Proof of Service by First-Class mail	Filed by Russell Rope (Plaintiff)
6/18/2025	Clerks Certificate of Service By Electronic Service	Filed by Clerk
6/18/2025	Minute Order (Court Order: Order on Ex Parte Application)	Filed by Clerk
6/13/2025	Renewed Ex Parte Application for Proposed TRO (CH-110)	Filed by Russell Rope (Plaintiff)
6/13/2025	Supplemental Declaration of Russell Rope - Filed in Support of Renewed Ex Parte Application for TRO - June 20, 2025	Filed by Russell Rope (Plaintiff)
6/11/2025	Certificate of Mailing for (Hearing on Ex Parte Application for Temporary Restraining Order) of 06/11/2025	Filed by Clerk
6/11/2025	Minute Order (Hearing on Ex Parte Application for Temporary Restraining Order)	Filed by Clerk
6/11/2025	Proof of Service by Mail	Filed by Russell Rope (Plaintiff)
6/10/2025	Alternative Dispute Resolution Packet	Filed by Clerk
6/10/2025	Civil Case Cover Sheet	Filed by Russell Rope (Plaintiff)
6/10/2025	Complaint	Filed by Russell Rope (Plaintiff)
6/10/2025	Declaration in Support of Application for Temporary Restraining Order	Filed by Russell Rope (Plaintiff)
6/10/2025	Declaration re: Due Diligence Regarding Service of Process	Filed by Russell Rope (Plaintiff)
6/10/2025	Ex Parte Application for Temporary Restraining Order	Filed by Russell Rope (Plaintiff)
6/10/2025	Notice of Case Assignment - Unlimited Civil Case	Filed by Clerk
6/10/2025	Order on Court Fee Waiver (Superior Court)	Filed by Clerk
6/10/2025	Summons on Complaint	Filed by Clerk

PROCEEDINGS HELD

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1/12/2026 08:30 AM	Department 28	Hearing on Motion for Order	Not Held - Vacated by Court
1/12/2026 08:30 AM	Department 28	Hearing on Motion for Order	Not Held - Vacated by Court
12/10/2025 08:30 AM	Department 28	Hearing on Motion for Protective Order	Not Held - Vacated by Court
12/10/2025 08:30 AM	Department 28	Hearing on Motion for Sanctions	Not Held - Vacated by Court
11/26/2025 08:30 AM	Department 28	Case Management Conference	Not Held - Taken Off Calendar by Court
11/26/2025 08:30 AM	Department 28	Hearing on Petition	Held

8/20/2025	Declaration OF JOSEPHINE PETRICK IN SUPPORT OF DEFENDANT COINBASE, INC.S PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS AND ACCOMPANYING REQUEST FOR JUDICIAL NOTICE	Filed by Coinbase, Inc. (Defendant)
8/20/2025	Petition DEFENDANT COINBASE, INC.S NOTICE OF PETITION AND PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES	Filed by Coinbase, Inc. (Defendant)
8/20/2025	Proof of Service (not Summons and Complaint)	Filed by Coinbase, Inc. (Defendant)
8/20/2025	Request for Judicial Notice	Filed by Coinbase, Inc. (Defendant)
7/30/2025	Substitution of Attorney	Filed by Coinbase, Inc. (Defendant)
7/21/2025	Notice OF FILING OF COINBASE, INC.S ANSWER TO PETITION FOR REVIEW IN THE CALIFORNIA SUPREME COURT	Filed by Coinbase, Inc. (Defendant)
7/21/2025	Notice of Filing in CA Supreme Court; Reply To Answer	Filed by Russell Rope (Plaintiff)
7/21/2025	Notice of Supplement Declaration of Spiritual Belief in Support of Petition & Reply	Filed by Russell Rope (Plaintiff)
7/17/2025	Appeal Document Stay Order B3473930	Filed by Clerk
7/9/2025	Notice of Filing Corrected Emergency Petition for Review with Request for Stay	Filed by Russell Rope (Plaintiff)
7/9/2025	Notice of Supplemental Filing in California Supreme Court	Filed by Russell Rope (Plaintiff)
7/8/2025	Notice of Emergency Petition for Review at Supreme Court of California	Filed by Russell Rope (Plaintiff)
7/8/2025	Request Notice of and Respectful Request for In Camera Identity Verification by the Honorable Judge Byrdsong	Filed by Russell Rope (Plaintiff)
7/7/2025	Certificate of Mailing for (Hearing on Ex Parte Application for Order Permitting Alternat...) of 07/07/2025	Filed by Clerk
7/7/2025	Declaration OF SANTOSH NAGARAL IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE, INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS BEYOND TO WEB3 WALLET BEYOND JULY 7, 2025	Filed by Coinbase, Inc. (Defendant)
7/7/2025	Minute Order (Hearing on Ex Parte Application for Equivalent Relief in Lieu...)	Filed by Clerk
7/7/2025	Minute Order (Hearing on Ex Parte Application for Order Permitting Alternat...)	Filed by Clerk
7/7/2025	Notice of Clarification Filing in California Supreme Court Case No. S291749	Filed by Russell Rope (Plaintiff)
7/7/2025	Notice of Ruling	Filed by Coinbase, Inc. (Defendant)
7/7/2025	Order Appointing Court Approved Reporter as Official Reporter Pro Tempore Shayna Montgomery, CSR 13452	Filed by
7/7/2025	Reply Declaration in Response to the Declaration	Filed by Russell Rope (Plaintiff)

7/3/2025	Minute Order (Hearing on Ex Parte Application TO DISSOLVE AND MODIFY THE PO...)	Filed by Clerk
7/3/2025	Notice Emergency Declaration and Request for Protection	Filed by Russell Rope (Plaintiff)
7/3/2025	Notice OF FILING OF PETITION FOR WRIT OF MANDATE IN THE CALIFORNIA SUPREME COURT	Filed by Russell Rope (Plaintiff)
7/3/2025	Notice OF RENEWED EMERGENCY PETITION FOR REVIEW	Filed by Russell Rope (Plaintiff)
7/3/2025	Notice PETITIONER'S SUPPLEMENTAL BRIEF, REQUEST FOR JUDICIAL NOTICE, AND DECLARATION IN SUPPORT OF EMERGENCY RELIEF	Filed by Russell Rope (Plaintiff)
7/3/2025	Notice of Ruling	Filed by Coinbase, Inc. (Defendant)
7/3/2025	Order Appointing Court Approved Reporter as Official Reporter Pro Tempore Monica Castaneda, CSR 10323	Filed by Coinbase, Inc. (Defendant)
7/2/2025	Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order; Memorandum of Points & Authorities; Declaration of Russell Rope in Support	Filed by Russell Rope (Plaintiff)
7/2/2025	Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint; Declaration in Support	Filed by Russell Rope (Plaintiff)
7/1/2025	Declaration DECLARATION OF JACQUELINE C. FEICK IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO WEB3 WALLET BEYOND JULY 7, 2025	Filed by Coinbase, Inc. (Defendant)
7/1/2025	Declaration DECLARATION OF JERRY NACOSTE IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO WEB3 WALLET BEYOND JULY 7, 2025	Filed by Coinbase, Inc. (Defendant)
7/1/2025	Ex Parte Application SPECIALLY APPEARING DEFENDANT COINBASE, INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND JULY 7, 2025	Filed by Coinbase, Inc. (Defendant)
7/1/2025	Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint.	Filed by Russell Rope (Plaintiff)
7/1/2025	Opposition to Coinbases Ex Parte Application to Modify or Dissolve the June 27, 2025 Preservation Order	Filed by Russell Rope (Plaintiff)
7/1/2025	Proof of Service (not Summons and Complaint)	Filed by Coinbase, Inc. (Defendant)
6/30/2025	Notice of Case Management Conference	Filed by Clerk
6/30/2025	Proof of Mailing (Substituted Service)	Filed by Russell Rope (Plaintiff)
6/27/2025	Minute Order (Hearing on Ex Parte Application of Plaintiff for Temporary Re...)	Filed by Clerk
6/26/2025	Ex Parte Application for Temporary Restraining order	Filed by Russell Rope (Plaintiff)

10/8/2025 08:30 AM	Department 28	Case Management Conference	Not Held - Continued - Court's Motion
10/2/2025 08:30 AM	Department 28	Hearing on Ex Parte Application	Held
7/7/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Held
7/7/2025 08:30 AM	Department 28	Hearing on Ex Parte Application	Not Held - Advanced and Continued - by Court
7/7/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Held
7/7/2025 08:30 AM	Department 28	Hearing on Ex Parte Application	Held
7/3/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Not Held - Taken Off Calendar by Party
7/3/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Held - Continued
7/3/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Not Held - Taken Off Calendar by Party
6/27/2025 08:30 AM	Department 82	Hearing on Ex Parte Application	Not Held - Rescheduled by Court
6/27/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Held
6/20/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Not Held - Advanced and Vacated
6/18/2025 10:45 AM	Department 82	Court Order	
6/11/2025 08:30 AM	Department 85	Hearing on Ex Parte Application	Held

REGISTER OF ACTIONS

[Case Information](#) | [Register Of Actions](#) | [FUTURE HEARINGS](#) | [PARTY INFORMATION](#) | [Documents Filed](#) | [Past Proceedings](#)

- 12/4/2025 Notice PLAINTIFFS NOTICE OF INTENT TO SEEK RECONSIDERATION &/OR EXTRAORDINARY WRIT RELIEF REGARDING ORDER GRANTING PETITION TO COMPEL ARBITRATION; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 12/4/2025 Request FOR IMMEDIATE ENTRY OF STATEMENT OF DECISION REGARDING ORDER GRANTING PETITION TO COMPEL ARBITRATION (CCP 632; CRC 3.1590); Filed by: Russell Rope (Plaintiff)
- 12/1/2025 Notice of Ruling; Filed by: Coinbase, Inc. (Defendant)
- 11/26/2025 Order Appointing Court Approved Reporter as Official Reporter Pro Tempore By: Cheri Bullock, CSR# 4714; Filed by: Coinbase, Inc. (Defendant)
- 11/26/2025 Post-Arbitration Status Conference scheduled for 03/25/2027 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 11/26/2025 Minute Order (Hearing on Petition Petition to Compel Arbitration and to Sta...)
- 11/26/2025 Address for Josephine Kendra Petrick (Attorney) updated

- 11/26/2025 The case is placed in special status of: Stay - Binding Arbitration
- 11/26/2025 Hearing on Petition Petition to Compel Arbitration and to Stay Proceedings (6039) scheduled for 11/26/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 updated: Result Date to 11/26/2025; Result Type to Held
- 11/26/2025 Case Management Conference scheduled for 11/26/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Taken Off Calendar by Court on 11/26/2025
- 11/26/2025 Hearing on Motion for Sanctions (5389) scheduled for 12/10/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Vacated by Court on 12/10/2025
- 11/26/2025 Hearing on Motion for Protective Order (2110) scheduled for 12/10/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Vacated by Court on 12/10/2025
- 11/26/2025 Hearing on Motion for Order Claim & Delivery (3316) scheduled for 01/12/2026 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Vacated by Court on 01/12/2026
- 11/26/2025 Hearing on Motion for Order Referral To Law Enforcement (3206) scheduled for 01/12/2026 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Vacated by Court on 01/12/2026
- 11/26/2025 Updated -- Petition DEFENDANT COINBASE, INC.S NOTICE OF PETITION AND PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES: Filed By: Coinbase, Inc. (Defendant); Result: Granted ; Result Date: 11/26/2025
- 11/25/2025 Request for Statement of Decision; Filed by: Coinbase, Inc. (Defendant)
- 11/25/2025 Response to Defendants Request for Statement of Decision; Filed by: Russell Rope (Plaintiff)
- 11/19/2025 Response DEFENDANT COINBASE, INC.S RESPONSE TO PLAINTIFF ROPES EVIDENTIARY OBJECTIONS AND OTHER FILINGS RE: COINBASES PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS; Filed by: Coinbase, Inc. (Defendant)
- 11/12/2025 Response to Petition TO DEFENDANT COINBASE, INC.?S REPLY IN SUPPORT OF PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; Filed by: Russell Rope (Plaintiff)
- 11/12/2025 Proof of Service (not Summons and Complaint); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 11/12/2025 Declaration Corrected; Filed by: Russell Rope (Plaintiff)
- 11/12/2025 Declaration Supplemental Declaration of Authentication of Exhibits; Filed by: Russell Rope (Plaintiff)
- 11/12/2025 Response to Petition TO DEFENDANT OBJECTIONS TO DISCOVERY; Filed by: Russell Rope (Plaintiff)
- 11/12/2025 Objection Notice & Request; Filed by: Russell Rope (Plaintiff)
- 11/12/2025 Proof of Service (not Summons and Complaint); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 11/12/2025 Request Stay Modification; Filed by: Russell Rope (Plaintiff)
- 11/7/2025 Reply Reply in Support of Petition to Compel Arbitration and Motion to Stay Proceedings; Filed by: Coinbase, Inc. (Defendant)
- 11/7/2025 Declaration Declaration of Josephine Petrick in Support of Defendant Coinbase, Inc.'s Reply in Support of Petition to Compel Arbitration and to Stay Proceedings; Filed by: Coinbase, Inc. (Defendant)
- 11/7/2025 Proof of Service (not Summons and Complaint); Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 10/27/2025 Notice of Appearance; Filed by: Coinbase, Inc. (Defendant)
- 10/6/2025 Notice of Ruling; Filed by: Coinbase, Inc. (Defendant)

- 10/2/2025 Updated -- Ex Parte Application To Stay Proceedings: Filed By: Coinbase, Inc. (Defendant); Result: Granted ; Result Date: 10/02/2025
- 10/2/2025 The case is placed in special status of: Stay - Entire Action/Case
- 10/2/2025 Minute Order (Hearing on Ex Parte Application To Stay Proceedings)
- 10/2/2025 Hearing on Ex Parte Application To Stay Proceedings scheduled for 10/02/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 updated: Result Date to 10/02/2025; Result Type to Held
- 10/2/2025 On the Court's own motion, Case Management Conference scheduled for 10/08/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Continued - Court's Motion was rescheduled to 11/26/2025 08:30 AM
- 10/1/2025 Ex Parte Application To Stay Proceedings; Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 10/1/2025 Memorandum Notice of and Memorandum of Points and Authorities In Support of Ex Parte Application to Stay Proceedings; Filed by: Coinbase, Inc. (Defendant)
- 10/1/2025 Proof of Service (not Summons and Complaint); Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 10/1/2025 Declaration in Support of Ex Parte Application; Filed by: Coinbase, Inc. (Defendant)
- 10/1/2025 Hearing on Ex Parte Application To Stay Proceedings scheduled for 10/02/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 10/1/2025 Opposition To Defendant's Ex Parte Application to Stay Proceedings; Filed by: Russell Rope (Plaintiff)
- 10/1/2025 Proof of Service (not Summons and Complaint); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 10/1/2025 Declaration of Russell Rope in Support of Opposition to Defendant's Ex Parte App to Stay Proceeding; Filed by: Russell Rope (Plaintiff)
- 9/30/2025 Supplemental Declaration In Support Of Case Management Statement; Filed by: Russell Rope (Plaintiff)
- 9/30/2025 Proof of Service (not Summons and Complaint); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 9/30/2025 Hearing on Motion for Protective Order scheduled for 12/10/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 9/30/2025 Hearing on Motion for Order Claim & Delivery scheduled for 01/12/2026 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 9/30/2025 Hearing on Motion for Order Referral To Law Enforcement scheduled for 01/12/2026 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 9/30/2025 Hearing on Motion for Sanctions scheduled for 12/10/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 9/29/2025 Motion for Protective Order; Filed by: Russell Rope (Plaintiff)
- 9/29/2025 Declaration in Support of Motion for Protective Order; Filed by: Russell Rope (Plaintiff)
- 9/29/2025 Motion for Sanctions; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 9/29/2025 Declaration in Support of Motion for Sanctions; Filed by: Russell Rope (Plaintiff)
- 9/29/2025 Declaration in Support of Motion for Referral to Law Enforcement; Filed by: Russell Rope (Plaintiff)
- 9/29/2025 Motion for Order Referral to Law Enforcement; Filed by: Russell Rope (Plaintiff)

- 9/29/2025 Declaration in Support of Motion for Claim & Delivery; Filed by: Russell Rope (Plaintiff); Coinbase, Inc. (Defendant)
- 9/29/2025 Motion for Order Claim & Delivery; Filed by: Russell Rope (Plaintiff)
- 9/25/2025 Proof of Service (not Summons and Complaint); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 9/23/2025 Case Management Statement; Filed by: Coinbase, Inc. (Defendant)
- 9/23/2025 Case Management Statement; Filed by: Russell Rope (Plaintiff)
- 9/23/2025 Opposition to Defendant's Petition to Compel Arbitration & Stay Proceedings; Filed by: Russell Rope (Plaintiff)
- 9/23/2025 Declaration of Russell Rope in Support of Opposition to Arbitration & Stay; Filed by: Russell Rope (Plaintiff)
- 9/23/2025 Proof of Personal Service; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant); Service Date: 09/23/2025; Service Cost Waived: Yes
- 8/21/2025 Hearing on Petition Petition to Compel Arbitration and to Stay Proceedings scheduled for 11/26/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 8/20/2025 Petition DEFENDANT COINBASE, INC.S NOTICE OF PETITION AND PETITION TO COMPEL ARBITRATION AND MOTION TO STAY PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES; Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 8/20/2025 Declaration OF JOSEPHINE PETRICK IN SUPPORT OF DEFENDANT COINBASE, INC.S PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS AND ACCOMPANYING REQUEST FOR JUDICIAL NOTICE; Filed by: Coinbase, Inc. (Defendant)
- 8/20/2025 Declaration OF JERRY NACOSTE IN SUPPORT OF DEFENDANT COINBASE, INC.S PETITION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS; Filed by: Coinbase, Inc. (Defendant)
- 8/20/2025 Request for Judicial Notice; Filed by: Coinbase, Inc. (Defendant)
- 8/20/2025 Proof of Service (not Summons and Complaint); Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 7/30/2025 Substitution of Attorney; Filed by: Coinbase, Inc. (Defendant)
- 7/21/2025 Notice OF FILING OF COINBASE, INC.S ANSWER TO PETITION FOR REVIEW IN THE CALIFORNIA SUPREME COURT; Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 7/21/2025 Notice of Supplement Declaration of Spiritual Belief in Support of Petition & Reply; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/21/2025 Notice of Filing in CA Supreme Court; Reply To Answer; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/17/2025 Appeal Document Stay Order B3473930; Filed by: Clerk
- 7/9/2025 Notice of Filing Corrected Emergency Petition for Review with Request for Stay; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/9/2025 Notice of Supplemental Filing in California Supreme Court; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/8/2025 Request Notice of and Respectful Request for In Camera Identity Verification by the Honorable Judge Byrdsong; Filed by: Russell Rope (Plaintiff)
- 7/8/2025 Notice of Emergency Petition for Review at Supreme Court of California; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/7/2025 Updated -- Minute Order (Hearing on Ex Parte Application of Plaintiff for Temporary Re...): Name Extension changed from (Hearing on Ex Parte Application of Plaintiff for Temporary Re...) to (Hearing on Ex Parte Application of Plaintiff for Temporary Re...)

- 7/7/2025** Updated -- Ex Parte Application SPECIALLY APPEARING DEFENDANT COINBASE, INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND JULY 7, 2025: Filed By: Coinbase, Inc. (Defendant); Result: Granted ; Result Date: 07/07/2025
- 7/7/2025** Updated -- Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order; Memorandum of Points & Authorities; Declaration of Russell Rope in Support: Filed By: Russell Rope (Plaintiff); Result: Denied ; Result Date: 07/07/2025
- 7/7/2025** Updated -- Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint; Declaration in Support: Filed By: Russell Rope (Plaintiff); Result: Denied ; Result Date: 07/07/2025
- 7/7/2025** Notice of Ruling; Filed by: Coinbase, Inc. (Defendant)
- 7/7/2025** Order Appointing Court Approved Reporter as Official Reporter Pro Tempore Shayna Montgomery, CSR 13452; Filed by:
- 7/7/2025** Declaration OF SANTOSH NAGARAL IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE, INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS BEYOND TO WEB3 WALLET BEYOND JULY 7, 2025; Filed by: Coinbase, Inc. (Defendant)
- 7/7/2025** Notice of Clarification Filing in California Supreme Court Case No. S291749; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/7/2025** Reply Declaration in Response to the Declaration; Filed by: Russell Rope (Plaintiff)
- 7/7/2025** Certificate of Mailing for (Hearing on Ex Parte Application for Order Permitting Alternat...) of 07/07/2025; Filed by: Clerk
- 7/7/2025** Minute Order (Hearing on Ex Parte Application for Order Permitting Alternat...)
- 7/7/2025** Minute Order (Hearing on Ex Parte Application for Equivalent Relief in Lieu...)
- 7/7/2025** Hearing on Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 updated: Result Date to 07/07/2025; Result Type to Held
- 7/7/2025** Hearing on Ex Parte Application TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND JULY 7, 2025 scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 updated: Result Date to 07/07/2025; Result Type to Held
- 7/7/2025** Hearing on Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 updated: Result Date to 07/07/2025; Result Type to Held
- 7/3/2025** Updated -- Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint.: Name Extension changed from for Order Permitting Alternative Service of Summons and Complaint to for Order Permitting Alternative Service of Summons and Complaint.
- 7/3/2025** Updated -- Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint.: Filed By: Russell Rope (Plaintiff); Result: Withdrawn ; Result Date: 07/03/2025
- 7/3/2025** Notice PETITIONER'S SUPPLEMENTAL BRIEF, REQUEST FOR JUDICIAL NOTICE, AND DECLARATION IN SUPPORT OF EMERGENCY RELIEF; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/3/2025** Hearing on Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85
- 7/3/2025** Hearing on Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85

- 7/3/2025** Notice OF FILING OF PETITION FOR WRIT OF MANDATE IN THE CALIFORNIA SUPREME COURT; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/3/2025** Notice of Ruling; Filed by: Coinbase, Inc. (Defendant)
- 7/3/2025** Notice OF RENEWED EMERGENCY PETITION FOR REVIEW; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/3/2025** Notice Emergency Declaration and Request for Protection; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/3/2025** Order Appointing Court Approved Reporter as Official Reporter Pro Tempore Monica Castaneda, CSR 10323; Filed by: Coinbase, Inc. (Defendant)
- 7/3/2025** Minute Order (Hearing on Ex Parte Application TO DISSOLVE AND MODIFY THE PO...)
- 7/3/2025** Hearing on Ex Parte Application TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND JULY 7, 2025 scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 updated: Result Date to 07/03/2025; Result Type to Held - Continued
- 7/3/2025** Hearing on Ex Parte Application For Order Permitting Alternative Service of Summons and Complaint scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 Not Held - Taken Off Calendar by Party on 07/03/2025
- 7/3/2025** On the Court's own motion, Hearing on Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28 Not Held - Advanced and Continued - by Court was rescheduled to 07/07/2025 08:30 AM at Department 85
- 7/2/2025** Hearing on Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85
- 7/2/2025** Hearing on Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 7/2/2025** Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint; Declaration in Support; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/2/2025** Hearing on Ex Parte Application For Order Permitting Alternative Service of Summons and Complaint scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85
- 7/2/2025** Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order; Memorandum of Points & Authorities; Declaration of Russell Rope in Support; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 7/2/2025** Hearing on Ex Parte Application for Equivalent Relief in Lieu of TRO or Emergency Preservation Order scheduled for 07/07/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 7/2/2025** Hearing on Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 Not Held - Taken Off Calendar by Party on 07/02/2025
- 7/1/2025** Ex Parte Application SPECIALLY APPEARING DEFENDANT COINBASE, INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND JULY 7, 2025; Filed by: Coinbase, Inc. (Defendant); As to: Russell Rope (Plaintiff)
- 7/1/2025** Declaration DECLARATION OF JERRY NACOSTE IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO WEB3 WALLET BEYOND JULY 7, 2025; Filed by: Coinbase, Inc. (Defendant)
- 7/1/2025** Proof of Service (not Summons and Complaint); Filed by: Coinbase, Inc. (Defendant)
- 7/1/2025** Hearing on Ex Parte Application TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO PLAINTIFFS WEB3 WALLET BEYOND

- JULY 7, 2025 scheduled for 07/03/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85
- 7/1/2025** Declaration DECLARATION OF JACQUELINE C. FEICK IN SUPPORT OF SPECIALLY APPEARING DEFENDANT COINBASE INC.S EX PARTE APPLICATION TO DISSOLVE AND MODIFY THE PORTION OF THE MINUTE ORDER ENTERED ON JUNE 27, 2025 PRESERVING ACCESS TO WEB3 WALLET BEYOND JULY 7, 2025; Filed by: Coinbase, Inc. (Defendant)
- 7/1/2025** Opposition to Coinbases Ex Parte Application to Modify or Dissolve the June 27, 2025 Preservation Order; Filed by: Russell Rope (Plaintiff)
- 7/1/2025** Ex Parte Application for Order Permitting Alternative Service of Summons and Complaint; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 6/30/2025** Case Management Conference scheduled for 10/08/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 6/30/2025** Notice of Case Management Conference; Filed by: Clerk
- 6/30/2025** Proof of Mailing (Substituted Service); Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant); Mailing Date: 06/28/2025; Cost Waived: Yes
- 6/30/2025** Case Management Conference scheduled for 11/26/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 28
- 6/27/2025** Updated -- Ex Parte Application for Temporary Restraining order: Filed By: Russell Rope (Plaintiff); Result: Granted in Part ; Result Date: 06/27/2025
- 6/27/2025** Minute Order (Hearing on Ex Parte Application of Plaintiff for Temporary Re...)
- 6/27/2025** Ex-parte Hearing on Ex Parte Application for Temporary Restraining order scheduled for 06/27/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 updated: Result Date to 06/27/2025; Result Type to Held
- 6/26/2025** Proof of Service by First-Class mail; Filed by: Russell Rope (Plaintiff); After Substituted Service of Summons and Complaint?: No
- 6/26/2025** Ex Parte Application for Temporary Restraining order; Filed by: Russell Rope (Plaintiff)
- 6/26/2025** Ex-parte Hearing on Ex Parte Application for Temporary Restraining order scheduled for 06/27/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 82
- 6/26/2025** Ex-parte On the Court's own motion, Hearing on Ex Parte Application for Temporary Restraining order scheduled for 06/27/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 82 Not Held - Rescheduled by Court was rescheduled to 06/27/2025 08:30 AM at Department 85
- 6/18/2025** Updated -- Renewed Ex Parte Application for Proposed TRO (CH-110); Filed By: Russell Rope (Plaintiff); Result: Denied ; Result Date: 06/18/2025
- 6/18/2025** Minute Order (Court Order: Order on Ex Parte Application)
- 6/18/2025** Clerks Certificate of Service By Electronic Service; Filed by: Clerk; As to: Russell Rope (Plaintiff)
- 6/18/2025** Ex-parte On the Court's own motion, Hearing on Ex Parte Application for Proposed TRO (CH-110) scheduled for 06/20/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 Not Held - Advanced and Vacated on 06/18/2025
- 6/13/2025** Ex Parte Application for Proposed TRO (CH-110); Filed by: Russell Rope (Plaintiff)
- 6/13/2025** Ex-parte Hearing on Ex Parte Application for Proposed TRO (CH-110) scheduled for 06/20/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85
- 6/13/2025** Supplemental Declaration of Russell Rope - Filed in Support of Renewed Ex Parte Application for TRO - June 20, 2025; Filed by: Russell Rope (Plaintiff)
- 6/13/2025** Updated -- Renewed Ex Parte Application for Proposed TRO (CH-110); Name Extension: blank ; Exact Name: Renewed Ex Parte Application for Proposed TRO (CH-110)

- 6/11/2025 Updated -- Ex Parte Application for Temporary Restraining Order: Filed By: Russell Rope (Plaintiff); Result: Denied ; Result Date: 06/11/2025
- 6/11/2025 Proof of Service by Mail; Filed by: Russell Rope (Plaintiff); After Substituted Service of Summons and Complaint?: No
- 6/11/2025 Minute Order (Hearing on Ex Parte Application for Temporary Restraining Order)
- 6/11/2025 Certificate of Mailing for (Hearing on Ex Parte Application for Temporary Restraining Order) of 06/11/2025; Filed by: Clerk
- 6/11/2025 Ex-parte Hearing on Ex Parte Application for Temporary Restraining Order scheduled for 06/11/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85 updated: Result Date to 06/11/2025; Result Type to Held
- 6/10/2025 Complaint; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 6/10/2025 Declaration in Support of Application for Temporary Restraining Order; Filed by: Russell Rope (Plaintiff)
- 6/10/2025 Declaration re: Due Diligence Regarding Service of Process; Filed by: Russell Rope (Plaintiff); As to: Coinbase, Inc. (Defendant)
- 6/10/2025 Order on Court Fee Waiver (Superior Court); Signed and Filed by: Clerk; As to: Russell Rope (Plaintiff)
- 6/10/2025 Civil Case Cover Sheet; Filed by: Russell Rope (Plaintiff)
- 6/10/2025 Summons on Complaint; Issued and Filed by: Clerk
- 6/10/2025 Alternative Dispute Resolution Packet; Filed by: Clerk
- 6/10/2025 Notice of Case Assignment - Unlimited Civil Case; Filed by: Clerk
- 6/10/2025 Case assigned to Hon. Rupert A. Byrdsong in Department 28 Stanley Mosk Courthouse
- 6/10/2025 Ex Parte Application for Temporary Restraining Order; Filed by: Russell Rope (Plaintiff)
- 6/10/2025 Ex-parte Hearing on Ex Parte Application for Temporary Restraining Order scheduled for 06/11/2025 at 08:30 AM in Stanley Mosk Courthouse at Department 85

[Back To Top](#)

EXHIBIT D

Verified Complaint + Declaration & Exhibits FAC Pending Discovery

Dated: June 10, 2025

1 RUSSELL ROPE
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 In Pro Per

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10 RUSSELL ROPE,)

11 Plaintiff,)

12 v.)

13 COINBASE, INC. & DOES 1-20,)

14 Defendant(s))

Case No.: _____

- 15) **VERIFIED COMPLAINT FOR:**
- 16) - **TEMPORARY RESTRAINING ORDER,**
- 17) - **INJUNCTIVE RELIEF,**
- 18) - **DECLARATORY RELIEF,**
- 19) - **CLAIM AND DELIVERY**
- 20) - **CONVERSION**
- 21) - **UNFAIR BUSINESS PRACTICES,**
- 22) - **CONSUMER LEGAL REMEDIES**
- 23) **ACT VIOLATION,**
- 24) - **CONSTRUCTIVE FRAUD,**
- 25) - **INTENTIONAL MISREPRESENTATION,**
- 26) - **INTENTIONAL INFLICTION OF**
- 27) **EMOTIONAL DISTRESS,**
- 28) - **INTERFERENCE WITH PROSPECTIVE**
-) **ECONOMIC ADVANTAGE,**
-) - **DEFAMATION, FALSE LIGHT,**
-) - **BREACH OF FIDUCIARY DUTY,**
-) - **HARASSMENT,**
-) - **MISAPPROPRIATION OF LIKENESS,**
-) - **VIOLATION OF CA PRIVACY RIGHTS,**
-) - **CIVIL CONSPIRACY,**
-) - **EXTORTION,**
-) - **COMPENSATORY DAMAGES,**
-) - **PUNITIVE DAMAGES**

24
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1 **I. INTRODUCTION**

2 1) Plaintiff RUSSELL ROPE sues Defendant COINBASE, INC. and DOES 1–20 for claim and
3 delivery, conversion, unfair business practices, violation of the Consumer Legal Remedies Act,
4 constructive fraud, intentional misrepresentation, intentional infliction of emotional distress, intentional
5 interference with prospective economic advantage, defamation, false light, breach of fiduciary duty,
6 harassment, misappropriation of likeness, violation of California privacy rights, civil conspiracy,
7 extortion, and declaratory relief, arising from malicious and oppressive conduct, including wrongfully
8 withholding access to Plaintiff’s Web3 Wallet containing potentially priceless Digital Assets valued at
9 \$2 million to hundreds of millions, with intent to cause injury (malice, Cal. Civ. Code §3294(c)(1)) and
10 impose cruel hardship (oppression, §3294(c)(2)).

11
12 2) Defendants are attempting to coerce Biometric Verification without consent, violated the California
13 Consumer Privacy Act (Cal. Civ. Code §1798.150(a)), caused intentional NFT display errors, schemed
14 to disrupt Plaintiff’s 999-NFT collection (~240 current, 160 ready and stalled) and cryptocurrency
15 presale for Classy Savage (CSVG @ classysavageart.com/coin), and risked CSVG’s indexing, causing
16 financial, emotional, and reputational harm.

17
18 3) Plaintiff seeks a Temporary Restraining Order (TRO) to restore Web3 Wallet access by June 30, 2025
19 by verifying and providing access to Coinbase account and Web3 Wallet without biometrics, or via
20 courtroom release of the private keys or seed phrases for the Web3 Wallet used to access accounts on
21 various NFT marketplaces as well as transferring NFT and cryptocurrency assets to a noncustodial
22 wallet, plus a \$100 million settlement (\$50 million cash + \$50 million CSVG investment) without RICO
23 claims, or significantly more if we go to trial without asset loss, or \$1 billion or more for total asset loss,
24 reserving federal RICO rights.

1 **II. DEFINITIONS**

2 4) **Web3 Wallet:** A cryptocurrency wallet using decentralized architecture to manage blockchain-based
3 assets, requiring digital signature-based access. The Web3 Wallet in this case is custodial, managed by
4 Coinbase, but owned by Plaintiff.

5
6 5) **Biometric Verification:** Authentication requiring physiological data, such as facial recognition scans,
7 to confirm identity; including a live unedited high-definition close-up selfie aka self-portrait.

8
9 6) **NFT (Non-Fungible Token):** A cryptographically unique digital token representing ownership of
10 digital or real-world assets, traded on blockchain platforms.

11
12 7) **Digital Assets:** Blockchain-based instruments, including the Web3 Wallet and its digital holdings;
13 NFTs and cryptocurrencies, here comprising potentially priceless digital art.

14
15 8) **Constructive Trust:** An equitable remedy to prevent unjust enrichment from wrongful property
16 retention (Cal. Civ. Code §2224).

17
18 9) **DOES 1–20:** Unknown and suspected parties involved in the misconduct, to be named upon
19 discovery per Cal. Code Civ. Proc. §474.

20
21 **III. NATURE OF THE ACTION**

22 10) On information and belief, Defendants, with malice and oppression, violated Plaintiff's rights by
23 imposing unconsented Biometric Verification (Cal. Civ. Code §1798.150(a)), misrepresenting access
24 options via correspondence with support chat using intentionally harassing aliases, wrongfully
25 withholding access to Plaintiff's Web3 Wallet, after initially causing intentional NFT display errors,
26 scheming to disrupt Plaintiff's 999-NFT collection and CSVG presale (advertised post-NFT drop), and
27 risking CSVG's indexing, despite CSVG tokens (999,999,999, minted via Solana CLI) being stored in a
28 cold wallet, not Coinbase, constituting grounds for claim and delivery and conversion (§§ 50–53).

1
2 11) Plaintiff requests: a. A TRO and injunction restoring Web3 Wallet access via courtroom private keys
3 or seed phrases release for NFT marketplace access (e.g., OpenSea, Rarible) and asset transfer to a
4 noncustodial wallet; b. A \$100 million settlement (\$50 million cash + \$50 million CSVG investment,
5 100x growth potential), excluding RICO claims; c. Alternatively, \$1 billion or more for total asset loss,
6 reserving federal RICO rights; d. Declaratory relief, restitution, and punitive damages (Cal. Civ. Code
7 §3294).

8
9 12) Plaintiff objects to Coinbase's arbitration clause and terms of service as procedurally and
10 substantively unconscionable under California law. Coinbase imposed these terms in a non-negotiable
11 adhesion contract, presented on a take-it-or-leave-it basis as a condition of accessing Plaintiff's custodial
12 Web3 Wallet containing digital property. The arbitration clause, not prominently displayed during
13 account creation if it was even posted at the time, lacked meaningful review or affirmative consent.
14 Plaintiff expressly rejected arbitration and small claims limitations through support chats, emails, and
15 certified mail. Substantively, the clause unduly restricts Plaintiff's remedies, limits public court access,
16 and grants Coinbase unilateral authority to freeze access, as evidenced by the Web3 Wallet lockout,
17 unfairly favoring Coinbase. These terms are unenforceable under Cal. Civ. Code §1670.5 and
18 *Armendariz v. Foundation Health Psychcare Services, Inc.*, 24 Cal. 4th 83 (2000).

19
20 13) Prior to filing, Plaintiff delivered a cease-and-desist and demand letter to Defendants, demanding
21 Web3 Wallet access, via certified mail to Coinbase's registered agent, also a copy sent the CEO's home
22 address, emails to support and legal addresses, internal support chats, and public notice through social
23 media and Plaintiff's blog. Defendants have not meaningfully responded despite the claims' severity.
24 These efforts are detailed in Plaintiff's concurrently to be filed Declaration of Due Diligence Regarding
25 Service of Process.

26
27 14) The arbitration clause's class action waiver creates an impermissible barrier to enforcing statutory
28 rights, constituting substantive unconscionability. For California Consumer Privacy Act violations (Cal.

1 Civ. Code §1798.150), with statutory damages of \$100–\$750 per incident, individual arbitration costs
2 far exceed potential recovery, effectively immunizing Coinbase from compliance. This barrier,
3 combined with arbitration's limited discovery procedures, prevents Plaintiff from obtaining evidence of
4 internal corporate policies, technical system failures (e.g., NFT display errors, ¶ 27), and misconduct
5 needed to prove who is behind claims more so than what is already evidenced regarding digital asset
6 conversion (¶ 52), unfair business practices (¶ 54), and civil conspiracy (¶ 79). The discovery
7 deprivation prejudices claims requiring proof of corporate intent for punitive damages and human
8 initiated technical causation of NFT errors.

9
10 15) The unconscionability is further evidenced by Coinbase's coercive terms imposition. Circa 2024,
11 Coinbase retroactively applied new verification requirements, including selfie demands without
12 Plaintiff's agreement, to existing accounts holding deposited assets, creating a coercive predicament
13 where Plaintiff faced loss of access to his custodial Web3 Wallet (¶ 10). This, combined with the June
14 30, 2025, wallet sunset, which threatens permanent asset loss (¶ 43), constitutes economic duress forcing
15 compliance. Coinbase's substantial resources, including \$6.56 billion in 2024 revenue and \$22.5 billion
16 in assets, exacerbate this imbalance, rendering arbitration costs inaccessible for Plaintiff, supported by
17 his in forma pauperis application (¶ 86(d)), compared to California's guaranteed court access. The
18 arbitration clause's prohibition on court access for high-value digital asset disputes and restricted
19 discovery, essential for proving technical and corporate misconduct, deceitfully shields Coinbase from
20 accountability.

21
22 16) Coinbase has already lost several precedent-setting arbitration challenges; specifically, in the
23 Supreme Court of The United States where justices unanimously ruled judges decide arbitrability
24 disputes (Coinbase v. Suski; 2024), and in the Ninth Circuit where Coinbase's arbitration enforcement
25 was denied (Coinbase v. Bielski, 2023). Moreover, Coinbase has previously settled at least one lawsuit
26 involving patterns of misconduct with a \$100 million NY DFS settlement — clearly not much of a
27 deterrent — and is currently facing multiple ongoing class actions. Plaintiff was allegedly not affected
28

1 by a recent data breach disclosure, but it would have caused irreparable damage had he played into their
2 scheme and gave them that for which they appeared to be both fishing & phishing.

3
4 **IV. PARTIES**

5 17) **Plaintiff RUSSELL ROPE**, a native Los Angeles, California resident, is a highly educated and
6 experienced entrepreneur, an award-winning both digital artist and web developer, and currently owns
7 and operates NFT and cryptocurrency ventures. These ventures include RRP OG LLC, a California-
8 based parent company overseeing a California general corporation, a multi-state nonprofit corporation,
9 and other interconnected businesses (russellrope.com/productions). The NFT collections in the custodial
10 Coinbase Web3 Wallet are part of Plaintiff's original "Classy Savage" art, crypto, and fashion brand,
11 operated as a sole proprietorship protected by common law trademark and copyright. Conceived more
12 than a decade ago, this has been the main focus (40+ hrs/wk) of Plaintiff's career for the past two years.
13 Defendants and other perpetrators have attempted to defraud Plaintiff of this and other ventures. As a
14 victim of similar crimes, Plaintiff has been an active member (ID 1607) of the California Secretary of
15 State's Safe at Home program since 2014, and with not limited to address confidentiality provisions that
16 account for his Sacramento address.

17
18 18) **Defendant COINBASE, INC.**, a Delaware corporation with headquarters in California overseeing
19 operations, is subject to this Court's jurisdiction, with its registered agent: CSC Lawyers Incorporating
20 Service, 251 Little Falls Drive, Wilmington, DE 19808, maintaining a designated office in Sacramento,
21 California.

22
23 19) Demonstrable by clear and convincing facts and evidence, DOES 1–20 are both known and
24 unknown parties scheming with Defendants to harm Plaintiff. Plaintiff will amend this complaint to
25 name DOES 1–20 upon ascertaining their identities, pursuant to Cal. Code Civ. Proc. §474.

1 **V. JURISDICTION AND VENUE**

2 20) Jurisdiction is proper under California Constitution, Article VI, §10. This action is not subject to
3 exclusive federal jurisdiction. Plaintiff seeks equitable and legal relief under California law for conduct
4 occurring in and impacting Los Angeles County.

5
6 21) Venue is proper under Cal. Code Civ. Proc. §395(a), as the harm occurred in Los Angeles County.

7
8 22) Plaintiff objects to Coinbase's arbitration and small claims limitation clauses on grounds of
9 procedural and substantive unconscionability (Cal. Civ. Code §1670.5), lack of mutual assent, and
10 adhesion, communicated via support chats, emails, and certified mail.

11
12 23) Coinbase's terms are invalid due to coercion and service inaccessibility.

13
14 **VI. GENERAL ALLEGATIONS**

15 24) Plaintiff holds Digital Assets in a Web3 Wallet linked to Coinbase, comprising potentially priceless
16 digital art presently valued at \$2 million to hundreds of millions. These assets include a portfolio of
17 approximately 4,000 NFTs, with a legendary 999-NFT collection in progress (~240 current, 160 ready
18 and stalled), potentially worth billions in 10–20 years. Defendants' wrongful withholding of access to
19 the Web3 Wallet constitutes grounds for claim and delivery (§ 50).

20
21 25) Plaintiff's valuation reflects documented digital art market realities. Recent transactions demonstrate
22 market willingness to pay millions for industry-relevant conceptual art pieces and up to \$69 million for
23 individual digital collectibles. Established NFT projects maintain market capitalizations exceeding \$800
24 million, validated through celebrity acquisitions and institutional auction house acceptance. Plaintiff's
25 \$2 million baseline for his NFT portfolio, including approximately 4,000 NFTs with a 999-NFT
26 collection in progress (~240 current, 160 ready and stalled), is a conservative valuation based on
27 comparable market transactions, initial sales, declined offers, missed offers, and excludes his CSVG
28 token venture and long-term business projections.

1 26) Plaintiff's deflationary CSVG tokens (total supply 999,999,999, minted via Solana CLI, stored in a
2 cold wallet via Phantom opposed to Coinbase) are intended for a presale advertised to follow the NFT
3 drop, disrupted by Coinbase's Web3 Wallet lockout.

4
5 27) During Plaintiff's NFT launches, Defendants schemed to cause errors in Coinbase's app and sites,
6 including mismatched metadata, image loading failures, and incorrect attribute displays, despite
7 identical metadata functioning correctly on marketplaces (e.g., OpenSea, Rarible), forcing Plaintiff to
8 abandon Coinbase's NFT features after support intentionally neglected numerous complaints.

9
10 28) Despite Plaintiff's public endorsements of Coinbase, including a newbie guide designed to educate
11 and create new potential clients, Defendants coordinated with DOES 1–20 to harm Plaintiff's ventures
12 since inception.

13
14 29) Plaintiff verified identity at signup with government ID, email, and phone; Biometric Verification
15 was not required, but there was an option to use it for login; specifically including facial recognition,
16 which Plaintiff has never enabled on any device or service.

17
18 30) Coinbase demanded unconsented "live high-definition close-up face scans," violating CCPA's notice
19 and consent requirements (Cal. Civ. Code §1798.100(a), §1798.150(a)), with oppressive intent to coerce
20 compliance.

21
22 31) Coinbase's support agents used mocking aliases (prison-themed, personal insults, medical
23 references), akin to NFT errors, linking Coinbase to other conspirators, to inflict emotional distress,
24 demonstrating malice, and eliminating any semblance of trust.

25
26 32) Plaintiff objected to Biometric Verification due to privacy concerns, medical issues, and synthetic
27 identity risks, which Coinbase disregarded oppressively.

1 33) Plaintiff invested into his 999-NFT and CSVG ventures, gas(transaction) fees valued around \$1,000,
2 Coinbase One membership valued around \$310, hardware & software valued around \$1,000,
3 mysteriously vanishing Coinbase Wallet valued at \$100, and at least two years of full-time labor, valued
4 at \$300,000–\$500,000 (based on a \$150,000–\$250,000 annual salary for tech/media skills,
5 (russellrope.com/original-genius-og); all disrupted by Coinbase's actions.
6

7 34) Plaintiff suffered severe emotional distress and privacy harm due to Defendants' actions, including
8 agitation, anger, anxiety, and sleeplessness from coercive Biometric Verification demands (§ 30),
9 mocking aliases (§ 31), and threats of permanent asset loss (§ 43). Plaintiff had a reasonable expectation
10 of privacy, given no initial Biometric Verification requirement (§ 29), and suffered reputational harm in
11 the cryptocurrency industry.
12

13 35) Defendants' false statements via mocking aliases (§ 31) were exposed to third parties, including
14 Coinbase support staff, other users or affiliates, through coerced publication, implying Plaintiff's
15 untrustworthiness and other character flaws damaging his reputation as a reputable entrepreneur (§ 17).
16 Evidence of these communications is preserved in screenshots and chat transcripts (§ 48).
17

18 36) Plaintiff's allegations regarding Defendants' scheming with DOES 1–20 (§ 28), risks to CSVG
19 indexing (§ 40), and post-dispute stalking and phishing (§ 46) are based on information and belief,
20 pending substantiation through discovery, including identification of DOES 1–20 and evidence of
21 Defendants' internal policies, technical errors, and coordinated misconduct.
22

23 37) Cryptocurrency and NFT markets operate in cyclical patterns with time-sensitive opportunities
24 impacting asset valuations, as seen on the Ethereum blockchain hosting Plaintiff's Classy Savage NFTs.
25 For example, Bitcoin's volatility—peaking near \$69,000 in November 2021, falling to \$15,500 in
26 November 2022, and recovering to approximately \$105,360 in June 2025—exemplifies this. Ethereum,
27 valued at approximately \$2,611 in June 2025, followed similar patterns, with NFT market volume
28 reaching \$17 billion in 2021, contracting through 2022–2024. Plaintiff strategically timed his launches

1 to capitalize on this bull market recovery, a 12–18-month cycle. Defendants' Web3 Wallet lockout and
2 NFT errors disrupted this.

3
4 38) Plaintiff lost around \$50,000 in NFT offers and halted development for his CSVG presale (150M
5 tokens, \$0.10–\$0.50 across five phases, targeting \$45 million, 100x growth to \$4.5 billion), advertised
6 post-NFT drop, causing delays, reputational and investor harm.

7
8 39) CSVG, with a white paper and tokenomics, was promoted publicly, including via multiple more
9 established brands for promotion and reputability. Coinbase, aware via identifiable DOES' influence on
10 support chats, maliciously disrupted the presale.

11
12 40) On information and belief, unresolved, Defendants' actions risk impairing CSVG's indexing on
13 Coinbase and other platforms, threatening Plaintiff's ventures.

14
15 41) Plaintiff sent emails and cease-and-desist letters; Coinbase refused acknowledgment let alone
16 substantive responses or alternatives.

17
18 42) Agents provided deceptive instructions risking asset loss (e.g., transfer of NFTs and cryptocurrency
19 to a new wallet without means for accessing marketplace accounts), showing reckless disregard.

20
21 43) Coinbase's June 30, 2025, Web3 Wallet sunset threatens permanent asset loss; with evidence (¶ 48)
22 to justify the TRO (¶ 86(a)).

23
24 44) Assuming that is individually targeted, Coinbase failed to adequately notify inactive users, risking
25 public harm to all at risk of losing access to their Web3 Wallets, to be explored in discovery.

26
27 45) Plaintiff's technical tests (taking pictures of older high-resolution selfies, creating and using realistic
28 AI headshots) revealed biased delays, then auto-rejection, both suggesting intentional barriers.

1 46) Plaintiff faced a significant increase of aggressive stalking, targeted phishing, and harassment,
2 consistent with Defendants' scheming and prior reports to law enforcement.

3
4 47) Coinbase's post-notice data breach validated Plaintiff's Biometric phishing concerns, showing
5 reckless disregard.

6
7 48) Plaintiff possesses evidence, including screenshots of Coinbase interfaces showing Biometric
8 Verification demands, the June 30 sunset notice, NFT metadata errors, support chats (mocking aliases),
9 and proof of CSVG promotional materials and tokenomics. Full documentation will be provided via
10 exhibits, discovery, or amendment.

11
12 49) Plaintiff reserves federal claims, including civil RICO, for a related future case.

13 14 **VII. CAUSES OF ACTION**

15 16 **First Cause of Action:**

17 **Claim and Delivery** (Cal. Code Civ. Proc. §512.010 et seq.)

18 50) Elements (CACI 2101; Cal. Code Civ. Proc. §512.010 et seq.): a. Plaintiff has a property right in his
19 Web3 Wallet and the Digital Assets contained within, valued at \$2 million to hundreds of millions (¶
20 24). b. Defendants are wrongfully withholding access by locking the Web3 Wallet, preventing Plaintiff
21 from accessing or transferring his Digital Assets (¶ 10). c. Plaintiff suffered harm, including \$50,000 in
22 lost NFT offers, inability to both renew NFT sales listings and collect royalties from previous sales,
23 delayed release of ready-to-drop NFTs, and a potential \$45 million presale with 100x growth potential (¶
24 38). d. The Digital Assets are unique, with no adequate remedy at law due to their irreplaceable nature (¶
25 24). e. Plaintiff is entitled to immediate possession of the Web3 Wallet and its contents, or injunctive
26 relief to restore access (Cal. Code Civ. Proc. §512.010).

27
28 51) Due to the imminent threat of permanent asset loss by June 30, 2025 (¶ 43), Plaintiff seeks

1 injunctive relief to restore Web3 Wallet access without Biometric Verification, including a court order
2 for Defendants to provide private keys or seed phrases to facilitate transfer of Digital Assets to a
3 noncustodial wallet, and/or possession of the Digital Assets under claim and delivery (Cal. Code Civ.
4 Proc. §512.010).

5
6 **Second Cause of Action:**

7 **Conversion** (Common Law)

8 52) Elements (CACI 2100; *Fremont Indem. Co. v. Fremont Gen. Corp.*, 148 Cal. App. 4th 97, 119
9 (2007)): a. Plaintiff owned or had a right to possess his Web3 Wallet’s Digital Assets (¶ 24). b.
10 Defendants intentionally and wrongfully withheld access to the Web3 Wallet, caused NFT display
11 errors, and prevented maintenance of sales listings (¶¶ 10, 27). c. Plaintiff did not consent to
12 Defendants’ actions (¶¶ 29, 31). d. Plaintiff was harmed, suffering losses of \$50,000 in NFT offers,
13 \$300,000–\$500,000 in labor, and potentially \$45 million in presale revenue with 100x growth potential
14 post-presale (¶¶ 33, 38). e. Defendants’ malicious (scheming, ¶ 27) and oppressive (coercion, ¶ 30)
15 conduct was a substantial factor in causing Plaintiff’s harm.

16
17 53) Plaintiff seeks compensatory damages for the value of the converted property (Cal. Civ. Code
18 §3336), punitive damages for Defendants’ malicious and oppressive conduct (Cal. Civ. Code §3294),
19 and injunctive relief to restore Web3 Wallet access.

20
21 **Third Cause of Action:**

22 **Unfair Business Practices** (Cal. Bus. & Prof. Code §17200 et seq.)

23 54) Elements (CACI 4600): a. Defendants committed: i. Unlawful acts by violating CCPA (Cal. Civ.
24 Code §1798.150(a), ¶ 30). ii. Unfair acts by coercing Biometric Verification and blocking Web3 Wallet
25 access (¶¶ 30, 10). iii. Fraudulent acts by misrepresenting access options and NFT functionality (¶¶ 27,
26 42). b. Defendants’ oppressive conduct harmed Plaintiff’s ventures (¶¶ 38–40). c. Public harm is likely
27 (inactive users, ¶ 44), warranting injunctive relief for Plaintiff and the public.

1
2 55) Plaintiff seeks restitution, disgorgement, and injunctive relief.
3

4 **Fourth Cause of Action:**

5 **Violation of Consumer Legal Remedies Act** (Cal. Civ. Code §1770)

6 56) Elements (CACI 4700): a. Plaintiff is a consumer (§ 17). b. Defendants engaged in unfair or
7 deceptive acts, including misrepresenting Web3 Wallet access and NFT functionality (§§ 27, 42) and
8 coercive Biometric Verification (§ 30), violating Cal. Civ. Code §1770(a)(5), (7), (14). c. Plaintiff was
9 harmed (\$50,000, \$45 million presale, § 38). d. Defendants' acts were a substantial factor (§ 10).

10 57) Plaintiff seeks damages, restitution, and injunctive relief.
11

12 **Fifth Cause of Action:**

13 **Constructive Fraud** (Cal. Civ. Code §1573)

14 58) Elements (CACI 4110): a. Defendants had a confidential relationship with Plaintiff as Web3 Wallet
15 custodians (§ 24). b. Defendants breached this duty by withholding access and causing NFT errors
16 without disclosure (§§ 10, 27). c. Plaintiff relied on Defendants' implied duty to act in good faith (§ 39).
17 d. Plaintiff was harmed (\$300,000–\$500,000, labor, potentially \$45 million presale to \$4.5 billion post-
18 presale, §§ 33, 38).
19

20 59) Plaintiff seeks damages and equitable relief.
21

22 **Sixth Cause of Action:**

23 **Intentional Misrepresentation** (Cal. Civ. Code §1710)

24 60) Elements (CACI 1900): a. Defendants misrepresented Web3 Wallet access, instruction safety, and
25 NFT functionality (§§ 27, 42). b. Defendants knew or recklessly disregarded the falsehoods (§ 42). c.
26 Defendants intended Plaintiff's reliance (§ 30). d. Plaintiff reasonably relied (§ 39). e. Plaintiff was
27 harmed, with losses to Digital Assets valued at \$2 million to hundreds of millions, \$300,000–\$500,000
28 in labor, and potentially \$45 million presale to \$4.5 billion post-presale (§§ 24, 33, 38).

1
2 61) Plaintiff seeks damages, punitive damages, \$50 million cash plus \$50 million CSVG investment.
3
4

5 **Seventh Cause of Action:**

6 **Intentional Infliction of Emotional Distress** (Common Law)

7 62) Elements (CACI 1600): a. Defendants' conduct (mocking aliases, Biometric Verification coercion,
8 NFT errors) was outrageous, intending distress (¶¶ 27, 31). b. Plaintiff suffered severe emotional
9 distress, including extreme agitation, anger, and heightened emotional volatility, manifesting as
10 sleeplessness and anxiety (¶ 34). c. Defendants' oppressive conduct was a substantial factor (¶ 30).

11
12 63) Plaintiff seeks compensatory and punitive damages.
13

14 **Eighth Cause of Action:**

15 **Intentional Interference with Prospective Economic Advantage** (Common Law)

16 64) Elements (CACI 2202; Blank v. Kirwan, 39 Cal. 3d 311 (1985)): a. Plaintiff had economic
17 relationships with buyers and investors (¶¶ 38–39). b. Defendants knew of these relationships (¶ 39). c.
18 Defendants wrongfully acted (lockout, fraud, NFT errors, scheming, ¶¶ 10, 27) with malice (¶ 31). d.
19 Relationships were disrupted (lost offers, presale delay, indexing risks, ¶¶ 38, 40). e. Plaintiff was
20 harmed (\$50,000, \$300,000–\$500,000 labor, potentially \$45 million presale to \$4.5 billion post-presale ,
21 ¶¶ 33, 38).

22
23 65) Plaintiff seeks compensatory damages and \$50 million cash plus \$50 million CSVG investment.
24

25 **Ninth Cause of Action:**

26 **Defamation** (Common Law)

27 66) Elements (CACI 1704): a. On information and belief, Defendants published false statements via
28 mocking aliases implying Plaintiff's untrustworthiness (¶ 31). b. Statements were seen by third parties

1 (necessarily publicized to thousands of followers, ¶¶ 35, 48). c. Statements made by Coinbase's support
2 staff were false, and contradictory to Plaintiff being a reputable entrepreneur (¶ 17). d. Defendants acted
3 with malice (¶ 31). e. Plaintiff suffered reputational harm, impacting investor relations in the
4 cryptocurrency industry where Defendant holds a prominent position, exacerbated by forced public
5 filings.

6
7 67) Plaintiff seeks damages and injunctive relief.
8

9 **Tenth Cause of Action:**

10 **False Light (Common Law)**

11 68) Elements (CACI 1802): a. Defendants publicized false facts via mocking aliases, placing Plaintiff in
12 a false light (¶ 31). b. The false light was highly offensive to a reasonable person (¶ 34). c. Defendants
13 acted with malice (¶ 31). d. Plaintiff suffered reputational and emotional harm in the cryptocurrency
14 industry where Defendant holds a prominent position, exacerbated by forced public filings (¶ 34).

15
16 69) Plaintiff seeks damages and injunctive relief.
17

18 **Eleventh Cause of Action:**

19 **Breach of Fiduciary Duty (Restatement (Second) of Torts §874)**

20 70) Elements (CACI 4100): a. Defendants, as Web3 Wallet custodians, owed Plaintiff a fiduciary duty
21 (¶ 24). b. Defendants breached this duty by locking Plaintiff out of the Web3 Wallet and causing NFT
22 errors (¶¶ 10, 27). c. Plaintiff was harmed (\$50,000, potential \$45 million presale to \$4.5 billion post-
23 presale, ¶ 38). d. The breach was a substantial factor (¶ 10).

24
25 71) Plaintiff seeks damages and equitable relief.
26
27
28

1 **Twelfth Cause of Action:**

2 **Harassment** (Cal. Civ. Code §527.6)

3 72) This cause of action is asserted in conjunction with Plaintiff’s request for a civil harassment
4 restraining order pursuant to Cal. Civ. Code §527.6.

5
6 73) Elements (CACI 1300): a. Defendants engaged in a knowing and willful course of conduct directed
7 at Plaintiff — including mocking aliases, phishing, stalking, and threatening correspondence (§§ 31, 46,
8 36); b. Said conduct would cause a reasonable person to suffer substantial emotional distress, and
9 Plaintiff in fact suffered such distress (§ 34); c. Plaintiff reasonably feared for his safety, property, or
10 continued access to his digital livelihood (§ 46).

11
12 74) Plaintiff seeks: A civil harassment restraining order enjoining Defendants from further harassment,
13 threats, or coercion; Injunctive relief preventing asset destruction or contact; and Compensatory
14 damages to the extent allowable under law.

15 **Thirteenth Cause of Action:**

16 **Misappropriation of Likeness** (Cal. Civ. Code §3344)

17 75) Elements (CACI 1803): a. Defendants used Plaintiff’s likeness by demanding Biometric Verification
18 scans (§ 30). b. Use was without consent (§ 31). c. Defendants gained a commercial advantage (§ 30). d.
19 Plaintiff was harmed (privacy invasion, § 34).

20
21 76) Plaintiff seeks damages, including statutory damages (\$750, §3344(a)).

22
23 **Fourteenth Cause of Action:**

24 **Violation of California Privacy Rights** (Article I, §1, Cal. Const.)

25 77) Elements (Hill v. Nat’l Collegiate Athletic Ass’n, 7 Cal. 4th 1 (1994)): a. Plaintiff has a legally
26 protected privacy interest in his biometric data (§ 30). b. Plaintiff had a reasonable expectation of
27 privacy, given no initial Biometric Verification requirement (§ 29). c. Defendants’ unconsented scans
28 constituted a serious invasion (§ 30), analogous to Illinois BIPA (Rosenbach v. Six Flags Ent. Corp.,

1 2019 IL 123186). d. Plaintiff suffered harm (privacy violation, emotional distress, ¶ 34).

2
3 78) Plaintiff seeks damages and injunctive relief.

4
5 **Fifteenth Cause of Action:**

6 **Civil Conspiracy** (Common Law)

7 79) Elements (CACI 3600; Wyatt v. Union Mortg. Co., 24 Cal. 3d 773 (1979)): a. Defendants and
8 DOES 1–20 agreed to commit wrongful acts (lockout, NFT errors, scheming, ¶¶ 10, 27, 28, 36). b.
9 Defendants committed overt acts (Biometric Verification, mocking aliases, ¶¶ 30, 31). c. Plaintiff was
10 harmed (\$50,000, \$300-500,000 labor, potentially \$45 million presale to \$4.5 billion post-presale, ¶ 38).

11
12 80) Plaintiff seeks damages and injunctive relief.

13
14 **Sixteenth Cause of Action:**

15 **Extortion** (Cal. Penal Code §518, Civil Liability)

16 81) Elements (CACI 1830; Flatley v. Mauro, 39 Cal. 4th 299 (2006)): a. Defendants demanded Plaintiff
17 create and submit a self-portrait (Biometric Verification scan, ¶ 30), a rare, unique, and therefore
18 valuable artwork as Plaintiff is a professional digital artist (¶ 17). b. Defendants threatened to destroy
19 Plaintiff's unique Digital Assets (Web3 Wallet and its holdings, ¶ 24) by June 30, 2025, if Plaintiff did
20 not comply (¶ 43). c. On information and belief, Defendants acted with intent to obtain the self-portrait
21 with malicious intent, or deprive Plaintiff of his assets (¶ 27). d. Plaintiff was harmed by emotional
22 distress (agitation, anger, anxiety, ¶ 62) and financial loss (¶ 38). e. Defendants' coercive threat was a
23 substantial factor in causing harm (¶ 30).

24
25 82) Plaintiff seeks compensatory damages, punitive damages (Cal. Civ. Code §3294), and injunctive
26 relief to prevent Web3 Wallet and asset destruction.

1 **Seventeenth Cause of Action:**

2 **Declaratory Relief** (Cal. Code Civ. Proc. §1060)

3 83) Elements (CACI 3900): a. A controversy exists over Plaintiff’s right to Web3 Wallet access without
4 nonstandard KYC (know your customer) use of Biometric Verification (¶¶ 10–12). b. Plaintiff seeks
5 judicial determination of his rights.

6
7 84) Plaintiff requests a declaration of access rights without Biometric Verification.

8
9 **VIII. PRAYER FOR RELIEF**

10 85) Plaintiff prays for judgment against Defendants as follows:

11
12 86) a. Due to the imminent threat of permanent asset loss by June 30, 2025, (¶ 43), a TRO for both
13 temporarily restoring Coinbase account and Web3 Wallet access without Biometric Verification and
14 courtroom release of the Web3 Wallet private keys or seed phrases in order to secure NFT marketplace
15 access (e.g., OpenSea, Rarible) and transfer Digital Assets to a noncustodial wallet (Cal. Code Civ. Proc.
16 §512.010, §527); b. A preliminary and permanent injunction barring Biometric Verification coercion,
17 asset deletion, and harassment (Cal. Code Civ. Proc. §527, Cal. Civ. Code §527.6); c. A declaratory
18 judgment confirming Plaintiff’s right to access Digital Assets without Biometric Verification (Cal. Code
19 Civ. Proc. §1060); d. Authorization for expedited sheriff-executed service, with sheriff fee waiver due to
20 Plaintiff’s in forma pauperis status, via simultaneous application, necessitated by financial hardship and
21 urgency by June 30, 2025 (¶ 43); e. Sealing of sensitive exhibits to protect Plaintiff’s reputation, not
22 limited to in the cryptocurrency industry (Cal. Rules of Court, Rule 2.550);

23
24 87) Damages and equitable relief, including: a. Compensatory Damages: \$47,350,000 (\$2–100+ million
25 art valuation, \$300,000–\$500,000 labor, potentially \$45 million CSVG presale to \$4.5 billion post-
26 presale delay, ¶¶ 24, 33, 38). b. Lost NFT revenue: \$50,000 (missed offers, ¶ 38). c. Punitive Damages:
27 \$100 million for malicious and oppressive conduct (Cal. Civ. Code §3294, ¶¶ 27, 30, 31). d. Statutory
28 Damages: \$750 for misappropriation of likeness (Cal. Civ. Code §3344(a), ¶ 75). e. Restitution and

1 Disgorgement: To be determined based on discovery (Cal. Bus. & Prof. Code §17203, ¶ 48). f.

2 Investment: \$50 million investment in CSVG (100x growth potential, ¶ 38).

3
4 88) Alternatively, \$1 billion or more in compensatory and punitive damages for total asset loss,
5 including the \$2 million to hundreds of millions valuation of Digital Assets and potential \$45 million to
6 \$4.5 billion CSVG presale losses, reserving federal RICO rights for a related case (¶ 49);

7
8 89) Referral to law enforcement for criminal prosecution of Defendants in violation of state or federal
9 laws; costs of suit and other just relief.

10
11 **IX. VERIFICATION**

12 90) I, Russell Rope, declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct to the best of my knowledge, including matters stated on information and
14 belief, which are based on reasonable grounds that I believe to be true.

15
16
17 Dated this 4th day of June, 2025

18 _____
19 *Russell Rope, Pro Se Plaintiff*

1 RUSSELL ROPE
ID 1607 POB 1198
2 Sacramento, CA 95812
3 310-663-7655
justice@russellrope.com
4 In Pro Per

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10 RUSSELL ROPE,

11 Plaintiff,

12 v.

13 COINBASE, INC. & DOES 1-20,

14 Defendant(s)
15
16
17
18
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20
21
22
23

Case No.: _____

**EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION IN
SUPPORT; DECLARATION RE NOTICE**

Hearing Date: _____ Dept: _____

Judge: _____

24
25 **Disclaimer & Notice of Copyright:** This application, including its original allegations and exhibits, is
26 the work of Plaintiff Russell Rope and is protected by copyright © 2025 Russell Rope. All rights
27 reserved. Reproduction or distribution for purposes other than judicial proceedings requires express
28 written permission from the copyright holder.

1 **TO THE COURT AND TO ALL INTERESTED PARTIES:**

2 1) Plaintiff Russell Rope respectfully applies ex parte for a Temporary Restraining Order (TRO) to
3 compel Defendant Coinbase, Inc. to immediately restore full and permanent access to Plaintiff's
4 custodial Web3 Wallet, or alternatively, to securely disclose the private keys or passphrase for said
5 wallet to enable transfer to a noncustodial wallet under Plaintiff's control, preferably in-camera or via a
6 court-approved secure method (Proposed TRO, ¶¶ 2–3).

7 2) This application is made pursuant to California Code of Civil Procedure §527, California Civil Code
8 §3422, and related equitable principles. Plaintiff seeks emergency relief due to Coinbase's imminent
9 June 30, 2025, deadline threatening permanent destruction of Plaintiff's digital assets, including unique
10 NFTs, resulting in irreparable harm (Verified Complaint, ¶¶ 43, 51).

11
12 **RELIEF REQUESTED**

13 3) Plaintiff respectfully requests the Court issue a TRO enjoining Coinbase, Inc., its agents, employees,
14 and those acting in concert, from:

- 15
- 16 a) Destroying, deleting, transferring, or otherwise rendering inaccessible Plaintiff's digital assets,
17 including the Web3 Wallet and its holdings (e.g., ~4,000 NFTs and cryptocurrency, Verified
18 Complaint, ¶ 24) stored in Coinbase's custodial Web3 Wallet services (Proposed TRO, ¶ 1(a));
 - 19 b) Requiring or imposing biometric verification (e.g., facial scans, 3D selfies) as a condition for
20 accessing or recovering Plaintiff's Web3 Wallet or its associated Coinbase account (Proposed
21 TRO, ¶ 1(b));
 - 22 c) Interfering with Plaintiff's administrative control or listings for NFT collections (e.g., "Classy
23 Savage" on OpenSea, Rarible, Magic Eden) linked to the Web3 Wallet, or engaging in retaliatory
24 or harassing actions, such as disabling login functionality to third-party platforms (Proposed
25 TRO, ¶ 1(c–d));
 - 26 d) Alternatively, compelling Coinbase to securely disclose the private keys or passphrase for the
27 Web3 Wallet within five court days, in-camera or via a court-approved secure method, to enable
28 transfer of digital assets to a noncustodial wallet (Proposed TRO, ¶ 3).

1
2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3 **I. Introduction**

4 4) Plaintiff is an entrepreneur, brand, and NFT creator whose Coinbase Web3 Wallet contains unique
5 digital assets, primarily NFT collections (~4,000 NFTs valued at \$1M–\$100M+, potentially higher,
6 Verified Complaint, ¶ 24). These assets are critical to Plaintiff’s business operations on OpenSea,
7 Rarible, and Magic Eden (Complaint, ¶ 17). Since April 19, 2025, Coinbase has locked Plaintiff out of
8 the Web3 Wallet and Coinbase account, demanding coercive biometric verification (e.g., facial scans,
9 3D selfies) not previously required (Complaint, ¶¶ 10, 30; Declaration, ¶¶ 18, 27). Coinbase’s June 30,
10 2025 “sunset” notice threatens permanent loss of access and assets, causing irreparable harm
11 (Complaint, ¶ 43, 51; Declaration, § 38).

12
13 **II. Legal Standard**

14 5) Under Cal. Code Civ. Proc. §527(a), a TRO may issue ex parte to prevent immediate and irreparable
15 injury before a hearing. Irreparable harm is established where monetary compensation is inadequate or
16 the property is unique (Cal. Civ. Code §3422; Robbins v. Superior Court (1985) 38 Cal.3d 199, 207).
17 The court balances hardships, favoring the applicant if harm outweighs defendant’s burden (IT Corp. v.
18 County of Imperial (1983) 35 Cal.3d 63, 69–70). Protection of constitutional privacy rights, including
19 against coerced biometric data collection, further justifies relief (White v. Davis (1975) 13 Cal.3d 757,
20 775; Cal. Civ. Code §1798.81.5). Explanation: Changed Robbins pinpoint to 207 for specific irreparable
21 harm discussion.

22
23 **III. Application**

24 6) Irreparable Harm: Plaintiff’s Web3 Wallet contains unique NFTs (~4,000, Complaint, ¶ 24), critical
25 to business operations. Permanent loss by June 30, 2025, cannot be compensated monetarily
26 (Declaration, ¶ 38).
27
28

1 7) Balance of Hardships: Plaintiff faces loss of livelihood, reputation, and investments, while Coinbase
2 faces minimal burden in restoring access or disclosing keys (Declaration, ¶¶ 34, 39; TRO, ¶¶ 2–3).

3 8) Biometric Privacy: Coinbase’s biometric demands (e.g., 3D facial scans) violate standard KYC
4 practices and privacy rights (Complaint, ¶ 30; Declaration, ¶ 21; Cal. Civ. Code §1798.81.5).

5 9) Likelihood of Success: Plaintiff’s claims (e.g., Claim and Delivery, Intentional Interference,
6 Complaint, ¶¶ 50–65) are supported by evidence of Coinbase’s and DOES 1–20’s malice and non-
7 responsiveness (Declaration, ¶¶ 28–31, 37; Complaint, ¶¶ 19, 27, 31).

8 10) Without a TRO, Plaintiff’s digital assets and business will be irrevocably lost.
9

10
11 **DECLARATION IN SUPPORT**

12 11) [Incorporated by reference: Declaration of Russell Rope, filed concurrently, detailing lockout since
13 April 19, 2025, biometric demands, NFT value, and urgency of June 30, 2025, deadline (Declaration, ¶¶
14 17–18, 35, 38).]

15
16 **DECLARATION RE: NOTICE**

17 I, Russell Rope, declare:

18 12) I am the Plaintiff in this action.

19 13) This is an ex parte request due to imminent and irreparable harm—Coinbase’s policy threatens asset
20 loss by June 30, 2025 (Verified Complaint, ¶ 43; Declaration, ¶ 38).

21 14) I attempted to provide notice of this application to Defendant, but Defendant failed to respond to
22 my formal cease-and-desist letter sent May 14, 2025, and subsequent communications (Verified
23 Complaint, ¶ 13; Declaration, ¶ 28). Further delay risks irreversible loss of digital assets by June 30,
24 2025, and emergency relief is necessary to prevent injustice (Cal. Rules of Court, Rule 3.1204).

25 15) I posted public notices and attempted to resolve the matter through Coinbase support channels (case
26 #23176995, April 19, 2025) and legal demand, to no avail (Declaration, ¶¶ 19, 28).
27
28

1 16) I request that the Court waive any possibly remaining notice requirement due to the urgent and
2 time-sensitive nature of this emergency.

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
5 correct.
6

7
8 Dated this 10th day of June, 2025

9
10 _____
11 *Russell Russell Rope, Plaintiff In Pro Per*
12
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3 justice@russellrope.com
In Pro Per
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5 c

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10 RUSSELL ROPE,

11 Plaintiff,

12 v.

13 COINBASE, INC. & DOES 1-20,

14 Defendant(s)
15
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22
23

) Case No.: _____

) **DECLARATION IN SUPPORT OF**
) **APPLICATION FOR TEMPORARY**
) **RESTRAINING ORDER**

24
25 **Disclaimer & Notice of Copyright:** This declaration, including its original allegations and exhibits, is
26 the work of Plaintiff Russell Rope and is protected by copyright © 2025 Russell Rope. All rights
27 reserved. Reproduction or distribution for purposes other than judicial proceedings requires express
28 written permission from the copyright holder.

1 I, Russell Rope, declare as follows:

2 **I. PERSONAL KNOWLEDGE AND COMPETENCY**

3 1) I am over 18 years of age and competent to testify to the matters set forth herein. I have personal
4 knowledge of the facts stated in this declaration, and if called as a witness, I could and would testify
5 competently thereto.

6 2) I conducted research on Defendant Coinbase, Inc.'s financial status, confirming its 2024 revenue as
7 approximately \$6.56 billion, as reported on Wikipedia and supported by public financial data, which is
8 referenced in my Verified Complaint (¶ 15) and attached as Exhibit A (Wikipedia screenshot or
9 Coinbase 2024 10-K filing excerpt, attached hereto).

10
11 **II. ACCOUNT CREATION AND INITIAL ACCESS (November 2023)**

12 3) I created my Coinbase account in November 2023 using standard identity verification requirements
13 including government-issued real ID (California Driver's License), verified email address, and verified
14 phone number.

15 4) No biometric verification was required at account creation or during initial setup. There was an option
16 to use biometrics for login, but I have never enabled facial recognition for any device or service. All of
17 my lenses are covered.

18 5) I was previously granted immediate access to Web3 Wallet services without any additional
19 verification requirements beyond the standard KYC (Know Your Customer) documentation.

20 6) I purchased Coinbase One membership, paying fees for premium features and support.

21
22 **III. DIGITAL ASSETS AND FINANCIAL INVESTMENT**

23 7) My most important Web3 ETH wallet address is 0x18e1dfcb9cc548e63afa943224d08cfa5baea7b8,
24 which can be verified on the Ethereum blockchain. Additional blockchain-based addresses are
25 connected to the private keys and/or passphrase.

26 8) As of June 2025, the wallet contains: a) The sole key to access and administer my NFT marketplace
27 accounts, collections, listings, sales, and royalties on multiple platforms; b) Approximately 400 NFTs,
28

1 including 202 unique items across 6 collections I created (~240 currently listed, 160 ready for listing,
2 Verified Complaint, ¶ 24); c) ETH Balance: 0.018034253552720271 ETH (valued at approximately
3 \$47.07 at current market rates); d) Additional cryptocurrencies valued at approximately \$10.

4 9) I have invested approximately \$435.35 USD in gas and transaction fees (equivalent to 0.17413947
5 ETH) to build and maintain my digital asset portfolio.

6 10) I have invested approximately \$100 on domain name registration, hosting, and printing.

7 11) I have invested a lifetime of experience; time in excess of 40 hours/week for 2 years (4,320 hours).

8 12) All transactions and holdings are verifiable on-chain, not limited to (TRO/Discovery for full list):

9 @ etherscan.io/txs?a=0x18e1dfcb9cc548e63afa943224d08cfa5baea7b8

11 IV. BUSINESS OPERATIONS AND MARKETPLACE ACCESS

12 13) I operate as a professional entrepreneur; brand and NFT creator, a digital artist with personal
13 collections listed on three major marketplaces; specifically, but not limited to:

14 @ opensea.io/russellrope

15 @ opensea.io/collection/classy-savage-nft

16 @ opensea.io/collection/classysavage

17 @ opensea.io/collection/classysavageart

18 @ rarible.com/russellrope

19 @ rarible.com/classysavage

20 @ rarible.com/classy-savage-nft

21 @ magiceden.io/u/russellrope

22 @ magiceden.us/collections/ethereum/classysavageart

23 @ magiceden.us/collections/ethereum/classy-savage-nft

24
25 14) Through those accounts, I maintain administrative control over 18 “Classy Savage” branded NFT
26 collection instances across three platforms, requiring active management (Verified Complaint, ¶ 24).

27 15) These NFT collections represent my artistic work and investment in digital assets, with some pieces
28 verifiably listed at high values (up to 999+ ETH) reflecting my business strategy of holding assets for

1 long-term appreciation.

2 16) Beginning in November 2024, I began systematically documenting account irregularities, including
3 intentional display of incorrect images and metadata for my NFT collections on Coinbase’s platform,
4 despite identical metadata functioning properly on other platforms (Verified Complaint, ¶ 27).

5
6 **V. DISCOVERY OF LOCKOUT AND VERIFICATION DEMAND (April 19, 2025)**

7 17) On April 19, 2025, I attempted to access my Web3 Wallet and discovered it was locked with an
8 error message stating “You must recover your account before you can sign this transaction. Go to
9 account recovery” (Verified Complaint, ¶ 10).

10 18) On April 19, 2025, Coinbase first demanded biometric verification (facial scan/selfie) as a condition
11 for restoring wallet access—the first time in over 17 months of account operation since November 2023
12 that any such verification had been demanded.

13 19) I immediately contacted Coinbase support on April 19, 2025, to dispute this new verification
14 requirement, opening support case #23176995.

15 20) During initial support chats beginning April 19, 2025, I explicitly rejected in writing: a) Biometric
16 verification requirements; b) Arbitration clauses; c) Small claims court limitations; d) Any modified
17 terms of service.

18 21) I noted that four-factor identification including biometric data is not standard KYC practice, and that
19 most platforms offering biometrics do so as an optional convenience feature, not a mandatory
20 requirement.

21 22) The lockout notice initially displayed a “48-hour” timeframe for resolution, but this notice remained
22 active significantly longer than 48 hours on multiple occasions.

23 23) I discovered an in-app notice about the verification requirement on April 19, 2025, and took a
24 screenshot for evidence. I received only one email notification about this significant account change,
25 which is inadequate given the potential impact on users and the reality that email inboxes are often filled
26 with spam (Verified Complaint, ¶ 44).

1 **VI. TESTING AND VALIDATION OF SUSPICIONS**

2 24) To test my suspicions about Coinbase’s intent and technical capabilities, I attempted verification
3 using both a high-quality archived selfie and AI-generated test images after initially refusing the
4 biometric requirement.

5 25) Initially, the verification process took a long time to fail; later, it became instant, suggesting manual
6 intervention rather than automated technical issues.

7 26) These tests validated my concerns about Coinbase’s verification process and confirmed patterns of
8 irregular behavior that I had been documenting since November 2024.

9 27) More recently, Coinbase logged me out of my entire account and attempted to require an even more
10 invasive 3D rotating face scan, escalating their biometric demands beyond the original selfie
11 requirement.

12
13 **VII. FORMAL LEGAL NOTICE AND RETALIATION (May 2025)**

14 28) On May 14, 2025, I sent a formal Cease, Desist & Demand letter to Coinbase, which is available at
15 russellrope.com/RRvsCB-CDD21-redacted.pdf.

16 29) On May 15, 2025—one day after my formal legal demand—news broke of an alleged Coinbase data
17 breach, reported publicly, validating my concerns about providing biometric data and raising questions
18 about the timing relative to my cease-and-desist (Verified Complaint, ¶ 16).

19 30) I received a response from escalations@coinbase.com on June 2, 2025, which repeated the same
20 demands without addressing my legal communications or the substantive issues raised in my cease-and-
21 desist letter.

22 31) The support representative appeared to be attempting to provoke a response while ignoring
23 communications through proper legal channels, coinciding with suspicious phishing attempts against me
24 from unknown parties.

25
26 **VIII. BUSINESS INTERFERENCE AND DAMAGES**

27 32) Coinbase’s lockout has prevented me from managing my business operations, including:

28 a. Unable to access my Web3 Wallet for transactions;

1 b. Unable to manage NFT collections on connected marketplaces;

2 c. Loss of administrative control over 18 collection instances across three platforms.

3 33) I informed Coinbase that they would be sued for interfering with my listings (some as high as 999+
4 ETH); they locked me out of the entire account and demanded a rotating/3D face scan in addition to the
5 Web3 Wallet demand for a selfie.

6 34) This interference with my artistic work and investment strategy has caused substantial business
7 damage, as I set prices based on my assessment of the art's value and invest in holding assets for long-
8 term appreciation.

9 35) I have been locked out of my account for over 7 weeks, with Coinbase indicating a June 30, 2025,
10 deadline for compliance with their biometric demands, threatening permanent loss of access to my
11 digital assets.

12
13 **IX. EVIDENCE PRESERVATION AND DOCUMENTATION**

14 36) I have systematically collected extensive evidence of these issues, including: a) Chat transcripts
15 from support case #23176995 and related interactions; b) Screenshots documenting the lockout process
16 and error messages; c) Evidence of NFT display irregularities dating back to November 2024; d)
17 Documentation of my written rejections of biometric verification and arbitration; e) File creation
18 timestamps showing systematic evidence preservation beginning in November 2024.

19 37) This evidence demonstrates a pattern of harassment and intentional interference with my business
20 operations by Coinbase and DOES 1–20, showing malice and intent rather than random technical
21 difficulties, as alleged in my Verified Complaint (¶¶ 19, 27, 31).

1 **X. URGENCY AND IRREPARABLE HARM**

2 38) The June 30, 2025, deadline imposed by Coinbase creates immediate urgency, as permanent loss of
3 access to my digital assets and business operations would cause irreparable harm that cannot be
4 adequately compensated by monetary damages, necessitating the injunctive relief requested in the
5 Proposed Temporary Restraining Order (¶¶ 1–3).

6 39) My reputation as a digital artist and NFT creator is being damaged by the inability to manage my
7 collections and maintain my marketplace presence.

8 40) The ongoing lockout prevents me from conducting normal business operations and responding to
9 market opportunities in the rapidly-changing cryptocurrency and NFT markets.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
11 correct.

12
13
14 Dated this 10th day of June, 2025

15 _____
16 *Russell Rope, Pro Se Plaintiff*
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EXHIBIT 1

SCREENSHOTS OF NFT COLLECTIONS ON MARKETPLACES

Source: opensea.com/russellrope, rarible.com/russellrope, magiceden.us/russellrope

Date: Various Dates (2023-2025)

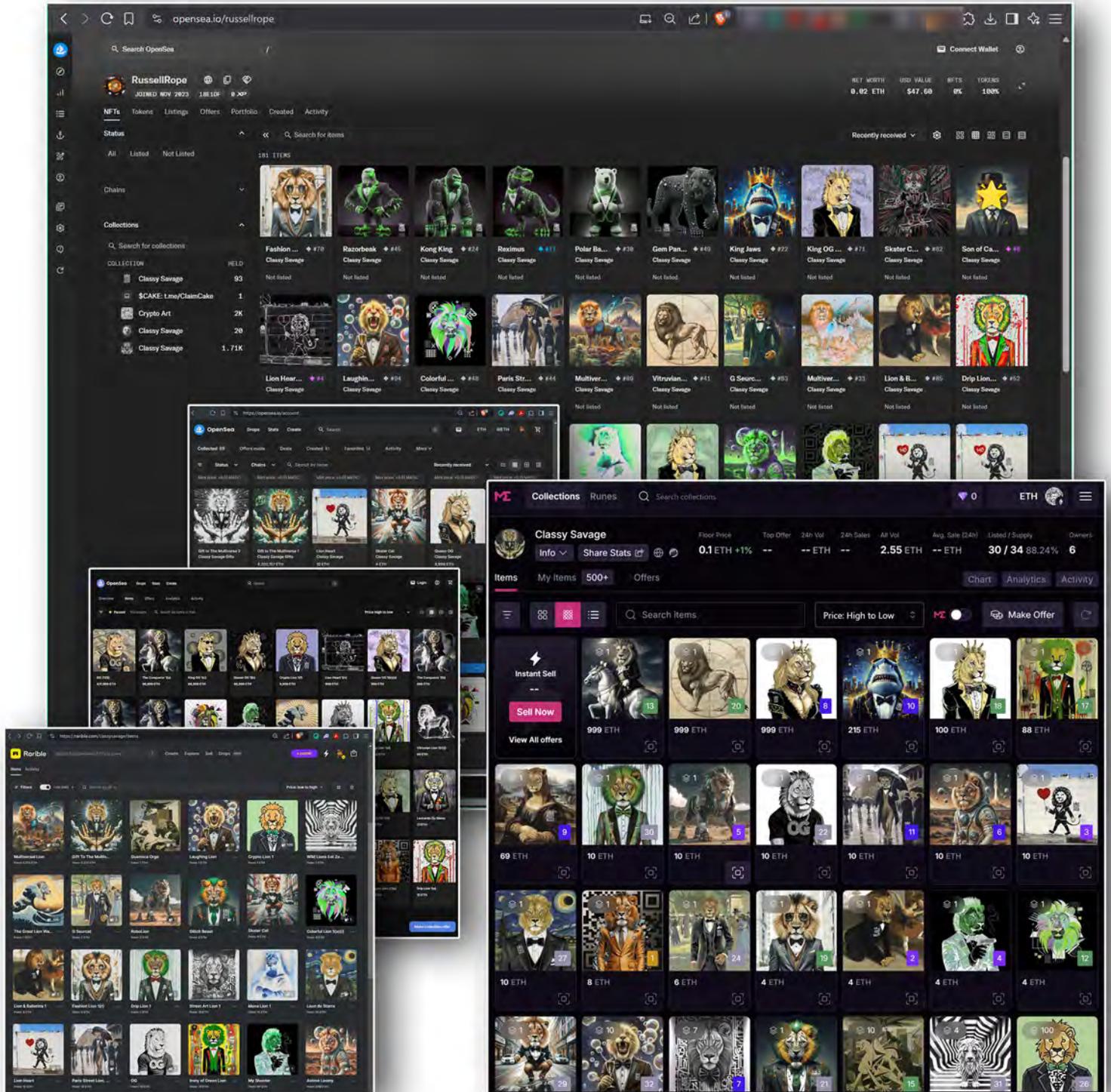


EXHIBIT 2

SCREENSHOTS DISPLAYING PROOF OF LOCKOUT

Source: Coinbase in app Web3 browser (left) & Coinbase app (right)

Date: 4-19-2025

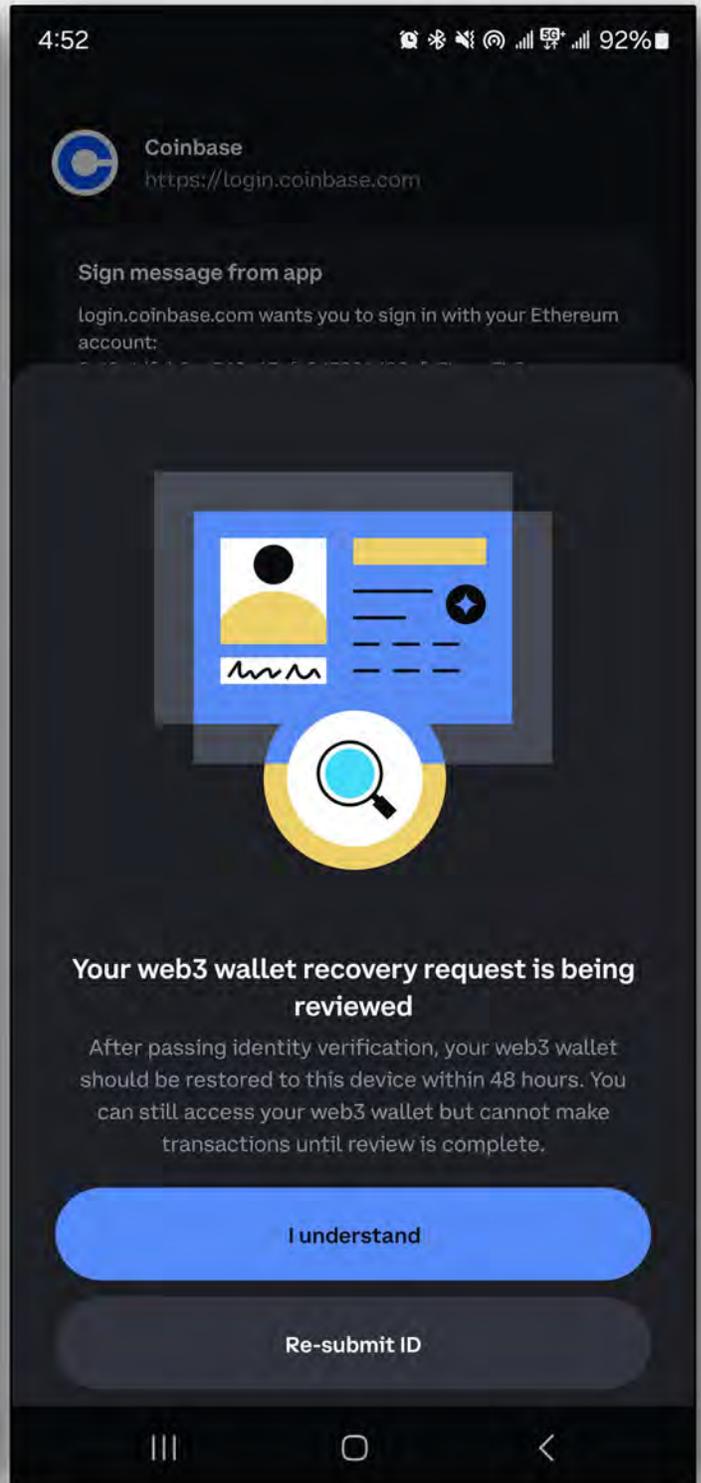
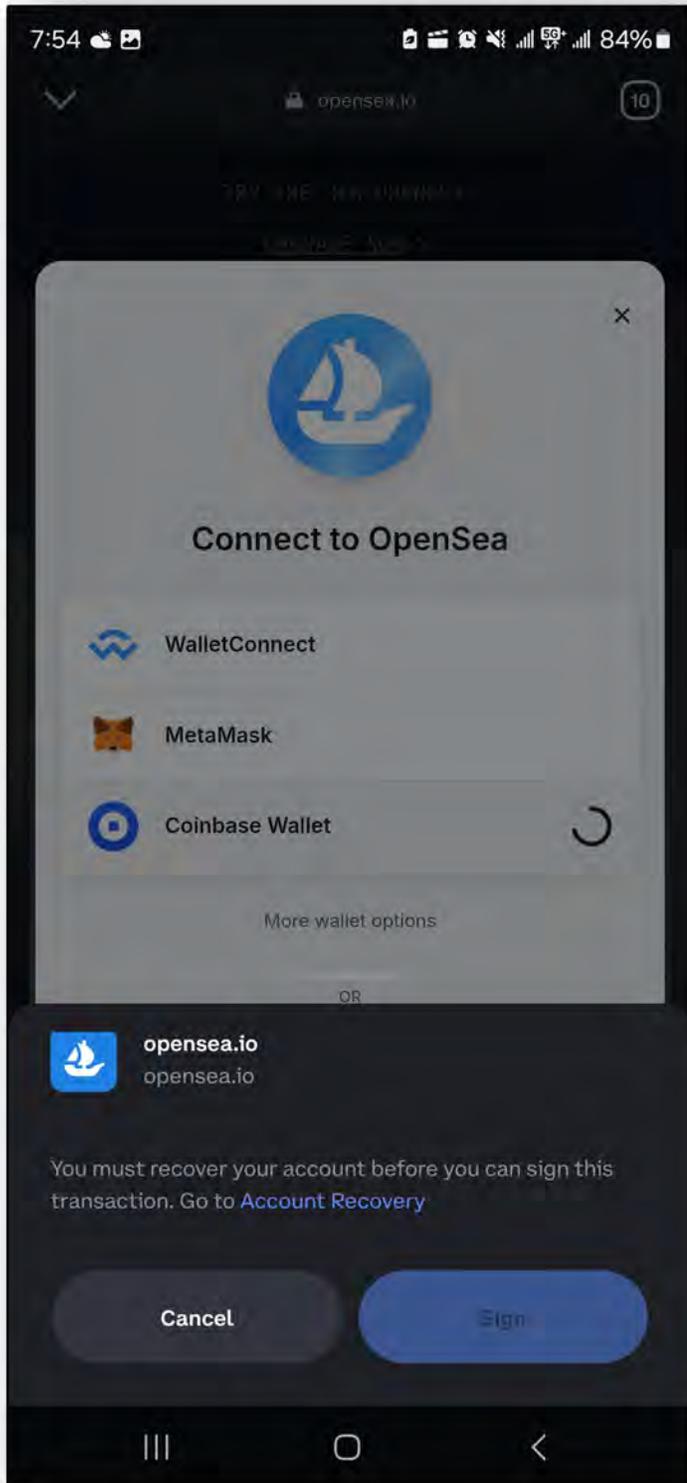


EXHIBIT 3

SCREENSHOT OF SUPPORT CHAT DISCONNECTION ATTEMPTS EACH TIME THEY WERE WRONG

Source: coinbase.com

Date: Various Dates (4-19-2025)

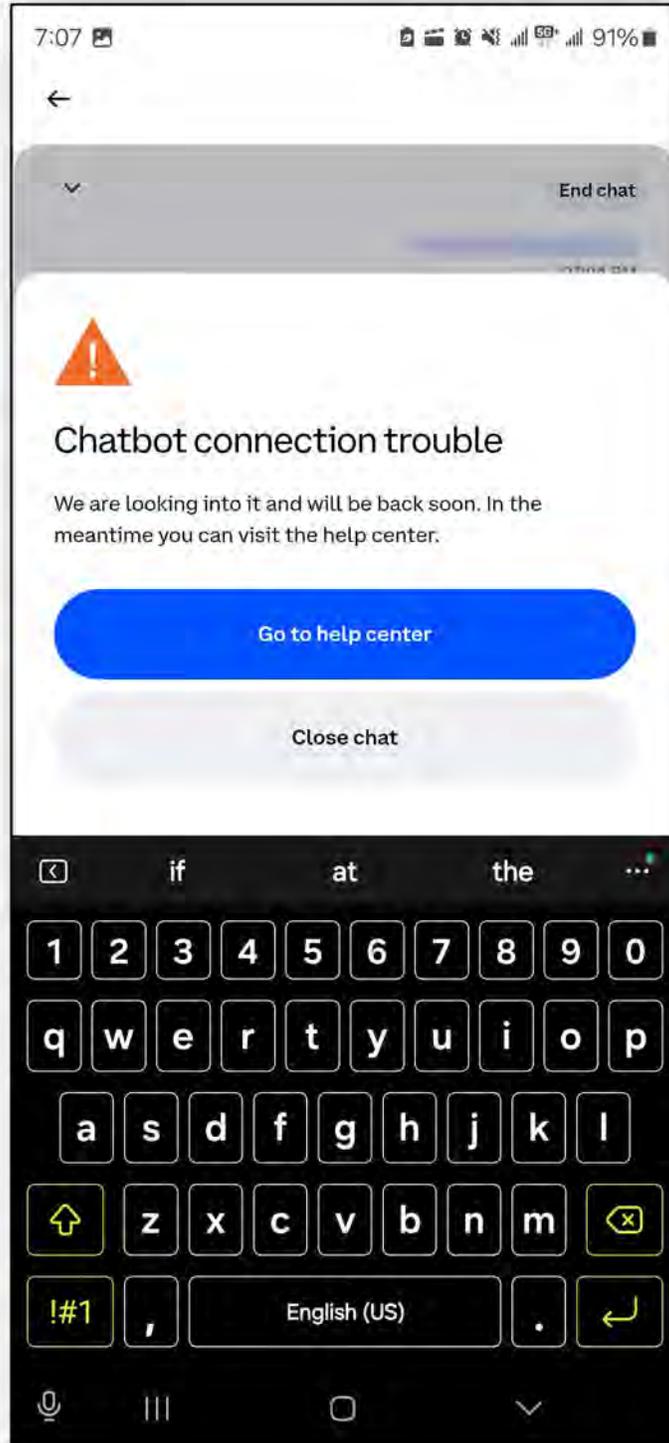


EXHIBIT 4

SCREENSHOT DISPLAYING THREAT OF IRREPARAPBLE LOSS

Source: Coinbase App

Date: 4-19-2025

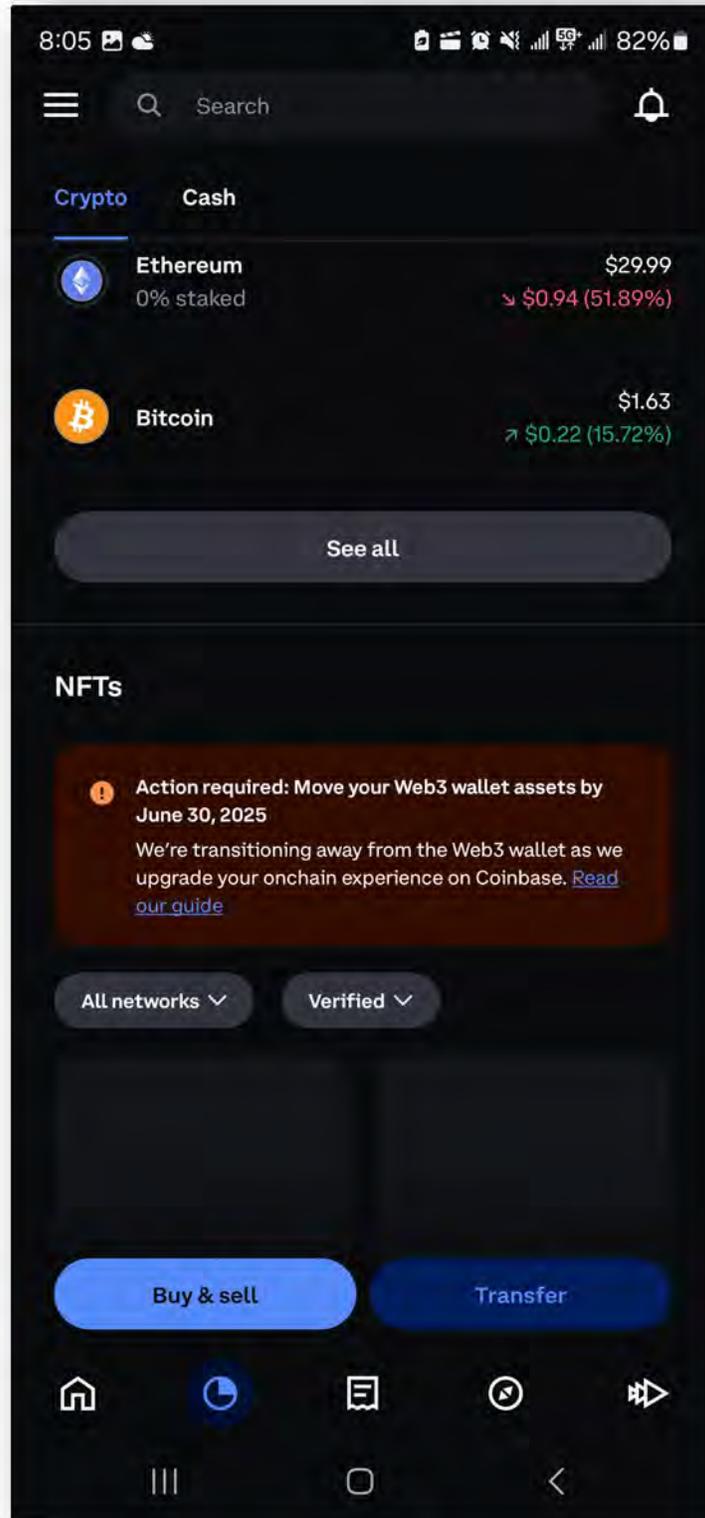


EXHIBIT 5

SCREENSHOT DISPLAYING TIMING DISCREPENCIES

Source: Coinbase App

Date: 5-15-2025

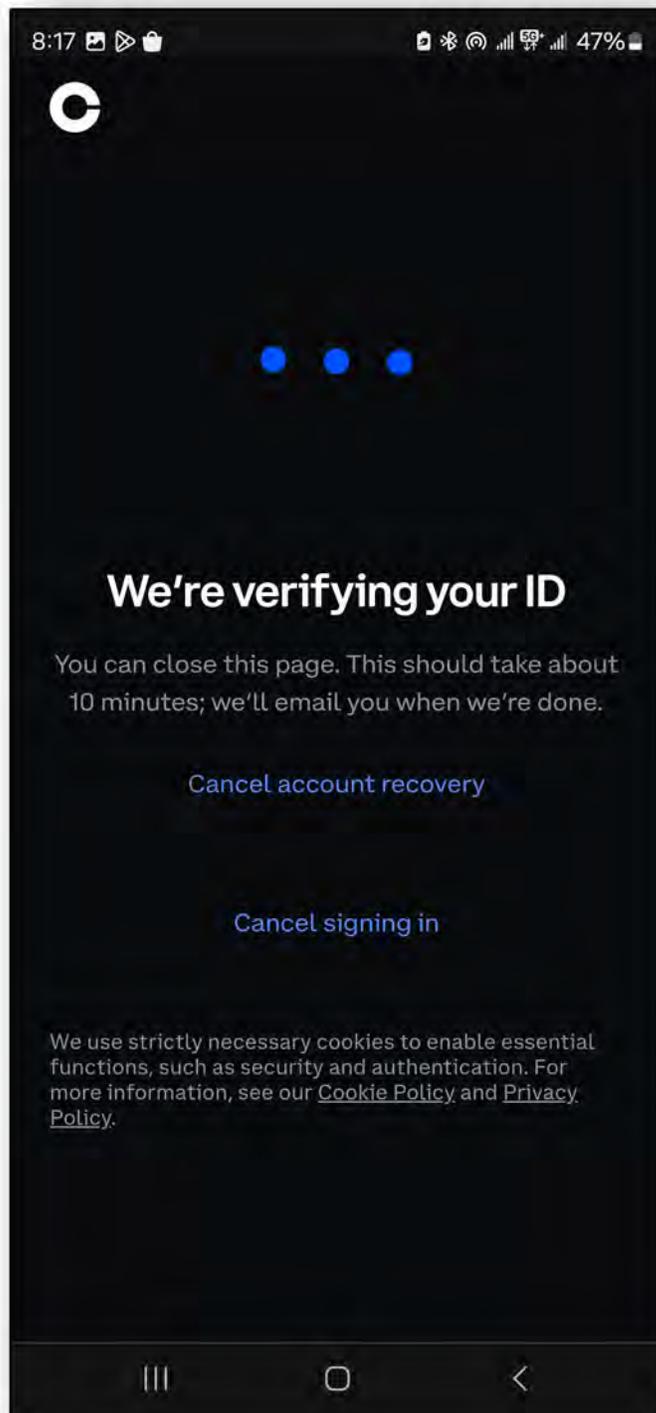


EXHIBIT 6

SCREENSHOTS DISPLAYING RELEVANT NEWS FOLLOWING OFFICIAL DEMAND LETTER

Source: Instagram App

Date: 5-15-2025 (left), 5-23-2025 (right)



1 RUSSELL ROPE
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
In Pro Per
4

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10 RUSSELL ROPE,
11 Plaintiff,
12
13 v.
14 COINBASE, INC. & DOES 1-20,
15 Defendant(s)
16
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22
23

) Case No.: _____

) **DECLARATION OF DUE DILIGENCE**
) **REGARDING SERVICE OF PROCESS**

24
25 **Disclaimer & Notice of Copyright:** This document, including all content, allegations, and exhibits, is
26 the original work of Plaintiff Russell Rope and is protected by copyright © 2025 Russell Rope. All
27 rights reserved. No part of this document may be reproduced, distributed, or transmitted in any form
28 without the express written permission of the copyright holder, except as permitted by law.

1 **I, Russell Rope, declare:**

2
3 1) I am the Plaintiff in this action, representing myself in pro per.

4
5 2) I have made repeated efforts to notify and serve Defendant **Coinbase, Inc.**, including through:

6
7 a. **Certified Mail:** Priority Express (overnight) – A cease and desist and demand letter was
8 sent to Coinbase’s registered agent via **certified mail** on or around **May 14, 2025**, directed
9 to: **CSC - Lawyers Incorporating Service**

10 2710 Gateway Oaks Drive, Suite 150N

11 Sacramento, CA 95833

12 b. **Email:** I sent notice and the same letter to multiple Coinbase email addresses, including:

13 support@coinbase.com, escalations@coinbase.com, & legal@coinbase.com

14
15 c. **Coinbase Support System:** I submitted the cease, desist, and demand letter plus relevant
16 legal documents through Coinbase’s browser-based support systems. My ongoing case
17 reference is: **#23176995**.

18 d. **Public Posting:** I posted notice of my legal claims and correspondence, including the
19 cease-and-desist letter, @ <https://russellrope.com/RRvsCB-CDD21-redacted.pdf>

20 e. **Social Media Publication:** I published reference to this legal dispute and claims on social
21 platforms used in connection with my business and professional reputation.

22 f. **Public Posting:** I posted everything @ <https://russellrope.com/real-legaltrilog-revolution>

23
24
25 3) Despite these efforts, Coinbase has failed to respond substantively or acknowledge any of my legal
26 claims, and continues to ignore requests for accommodation, dispute resolution, or preservation of
27 assets.
28

1 4) Due to my **in forma pauperis status**, I respectfully request that the Court allow **service by certified**
2 **mail** and/or authorize **service via court-ordered alternative method**, as personal service through
3 sheriff or professional process server is **not financially feasible**, especially given Defendant's out-of-
4 state agent and unresponsiveness.

5
6 5) Given the emergency circumstances and **June 30, 2025** deadline imposed by Coinbase, I am
7 preparing to **overnight** a copy of the Complaint, TRO Application, Summons, and supporting
8 documents via **certified mail** with return receipt requested to Coinbase's registered agent.

9
10 I declare under penalty of perjury under the laws of the State of California that, to the best of my
11 knowledge, the foregoing is true and correct.

12
13
14 Dated this 10th day of June, 2025

15 _____
16 *Russell Russell Rope, Plaintiff In Pro Per*
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6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10 RUSSELL ROPE,

11 Plaintiff,

12 v.

13 COINBASE, INC. & DOES 1-20,

14 Defendant(s)
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23

Case No.: _____

[PROPOSED]

TEMPORARY RESTRAINING ORDER

24
25 **[PROPOSED] TEMPORARY RESTRAINING ORDER**

26 This matter came before the Court on Plaintiff's **Ex Parte Application for Temporary Restraining**
27 **Order** against Defendant **COINBASE, INC.**, filed concurrently with the Verified Complaint and
28 Declaration of Russell Rope.

1 Having reviewed the Complaint, Declarations, and supporting documents, and good cause appearing due
2 to the imminent threat of permanent asset loss by June 30, 2025, as alleged in Plaintiff’s Verified
3 Complaint (¶¶ 43, 51):

4 **IT IS HEREBY ORDERED THAT:**

- 5
- 6 1) **Defendant COINBASE, INC.** and its agents, employees, representatives, contractors,
7 subsidiaries, or anyone acting in concert with it, are restrained and enjoined from: a. Permanently
8 deleting, disabling, transferring, or otherwise restricting access to Plaintiff’s custodial Web3
9 Wallet associated with Coinbase Wallet services; b. Imposing or enforcing biometric verification
10 requirements (e.g., facial recognition scans, live high-definition selfies) as a condition for
11 accessing or recovering Plaintiff’s Coinbase account or Web3 Wallet; c. Removing, altering, or
12 interfering with Plaintiff’s administrative control or listings for NFT collections, including the
13 999-NFT collection (~240 current, 160 ready), linked to Plaintiff’s Web3 Wallet on platforms
14 such as OpenSea and Rarible; d. Taking any further retaliatory or harassing actions against
15 Plaintiff, including disabling login functionality to third-party platforms integrated with the
16 Web3 Wallet (e.g., OpenSea, Rarible) or using coercive or mocking communications.
- 17 2) Alternatively, within five (5) court days of service of this Order, Defendant may temporarily
18 restore access to both Coinbase App including the Web3 Wallet, then securely disclose the
19 private keys or seed phrases for Plaintiff’s Web3 Wallet in-camera in order to protect Plaintiff’s
20 Digital Assets until they are completely transferred to a noncustodial wallet.
- 21 3) This Order shall remain in effect until a hearing on Plaintiff’s request for a preliminary
22 injunction, to be scheduled by the Court within 15–22 days of this Order’s issuance, or until
23 further order of this Court.
- 24 4) Pursuant to Cal. Code Civ. Proc. §995.240, Plaintiff requests a waiver of the bond requirement
25 due to his indigent status, as supported by his concurrently filed in forma pauperis application
26 (Verified Complaint, ¶ 86(d)).
27
28

1 5) This Order shall be served on Defendant COINBASE, INC. via expedited sheriff-executed
2 service, with sheriff fees waived pursuant to Plaintiff's in forma pauperis status (Verified
3 Complaint, ¶ 86(d)), at Defendant's registered agent: Corporation Service Company, 2710
4 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833, within two (2) court days of issuance.
5

6 **IT IS SO ORDERED.**
7

8 Dated this _____ day of June, 2025
9

10 _____
Russell Judge of The Superior Court
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EXHIBIT E1

Petitioner's Discovery Request For Admission (RFA)

Dated: September 24, 2025

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

<p>10 RUSSELL ROPE,</p> <p>11 Plaintiff,</p> <p>12 v.</p> <p>13 COINBASE, INC. & DOES 1-20,</p> <p>14 Defendants</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p>	<p>)</p>	<p>Case No.: <u>25STCV16692</u></p> <p>PLAINTIFF’S FIRST SET OF REQUESTS</p> <p>FOR ADMISSION TO DEFENDANT</p> <p>COINABASE, INC.</p> <p>Propounding Party: Plaintiff Russell Rope</p> <p>Responding Party: Defendant Coinbase, Inc.</p> <p>Set Number: One</p>
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19
20 **PLEASE ADMIT, OR DENY**

21 Pursuant to Code of Civil Procedure §2033.010 et seq., Plaintiff requests Defendant admit or deny the
22 following:

- 23 1. Admit that Plaintiff was locked out of his Coinbase account by Defendant’s custodial controls
- 24 and not because Plaintiff lost his private keys.
- 25
- 26 2. Admit that Defendant, through its employees or agents, had the ability to override or reset the
- 27
- 28
- lockout.

- 1 3. Admit that the lockout of Plaintiff’s account was triggered while Plaintiff attempted to log in
2 from a new or different device.
- 3 4. Admit that Coinbase’s system retains audit logs recording when and why a customer account is
4 locked or restricted.
- 5 5. Admit that after Plaintiff canceled his Coinbase One subscription, Defendant reactivated billing
6 or auto-pay without Plaintiff’s authorization.
- 7 6. Admit that Defendant charged Plaintiff’s payment method at least three times after he canceled
8 his Coinbase One subscription.
- 9 7. Admit that the purported “refund” of \$119.96 was not returned to Plaintiff’s original payment
10 method but was deposited into Plaintiff’s locked USDC wallet.
- 11 8. Admit that at no time did Plaintiff expressly consent to receiving refunds in USDC rather than
12 his original method of payment.
- 13
- 14
- 15
- 16
- 17

18 **DEFINITIONS & INSTRUCTIONS**

- 19 1. These Requests for Admission are propounded pursuant to California Code of Civil Procedure
20 §2033.010 et seq.
- 21 2. The term “YOU” or “YOUR” refers to Defendant Coinbase, Inc., including its present and
22 former officers, directors, employees, agents, contractors, attorneys, affiliates, and
23 representatives.
- 24 3. The term “DOCUMENT” means any written, printed, typed, recorded, or electronically stored
25 matter of any kind, whether draft or final, including but not limited to emails, logs, manuals,
26 policies, contracts, and records.
- 27
- 28

- 1 4. The term “COMMUNICATION” means any oral, written, or electronic transmission of
2 information, including conversations, correspondence, calls, emails, texts, or internal messaging.
3
4 5. If YOU object to any Request, state the specific ground(s) for objection and admit to the extent
5 the Request is not objectionable.
6
7 6. If YOU cannot admit the Request in full, admit so much as is true and qualify or deny the
8 remainder.
9
10 7. If YOU deny a Request, YOU must state all facts, witnesses, and documents upon which the
11 denial is based.
12
13 8. These Requests are deemed continuing under CCP §2033.080 and YOU must provide
14 supplemental responses if additional information becomes available.
15
16 9. Unless otherwise specified, the relevant time period is from the date Plaintiff created his
17 Coinbase account to the present.
18

19 Respectfully submitted,

20 Dated: September 24, 2025

21 /s/ Russell Rope
22 *Plaintiff In Pro Per*
23
24
25
26
27
28

EXHIBIT E2

Petitioner's Discovery Request For Production

Dated: September 24, 2025

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

<p>10 RUSSELL ROPE,</p> <p>11 Plaintiff,</p> <p>12 v.</p> <p>13 COINBASE, INC. & DOES 1-20,</p> <p>14 Defendants</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p>	<p>)</p>	<p>Case No.: <u>25STCV16692</u></p> <p>PLAINTIFF’S FIRST REQUESTS FOR</p> <p>PRODUCTION TO DEFENDANT</p> <p>COINBASE, INC.</p> <p>Propounding Party: Plaintiff Russell Rope</p> <p>Responding Party: Defendant Coinbase, Inc.</p> <p>Set Number: One</p>
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19
20 Pursuant to CCP §2031.010 et seq., Plaintiff requests Defendant produce the following documents **no**
21 **later than seven (7) days prior to the scheduled PMK deposition:**

- 22 1. All audit logs reflecting the lockout of Plaintiff’s account, including timestamps, device
- 23 identifiers, IP addresses, and reasons recorded for the lockout.
- 24 2. All documents, manuals, or policies describing Coinbase’s account lockout and administrative
- 25 override processes.
- 26 3. All communications (internal and external) relating to Plaintiff’s account lockout.
- 27
- 28

- 1 4. All contracts, agreements, or communications with biometric verification vendors in effect at the
2 time of Plaintiff's lockout.
- 3 5. All documents evidencing Plaintiff's cancellation of Coinbase One.
- 4 6. All billing records showing Coinbase One charges applied to Plaintiff after cancellation.
- 5 7. All documents showing Coinbase's internal handling of the purported \$119.96 refund, including
6 records showing the decision to convert the refund into USDC.
- 7 8. All policies in effect concerning refunds and whether they must be returned to the original
8 payment method.
- 9 9. All internal communications referencing Plaintiff's refund or Coinbase One billing issue.
- 10 10. All organizational charts, or identification documents, sufficient to show the names and titles of
11 employees involved in Plaintiff's lockout, billing/reactivation, or refund.
- 12
- 13
- 14
- 15
- 16

17 **DEFINITIONS & INSTRUCTIONS**

- 18 1. These Requests for Production are propounded pursuant to California Code of Civil Procedure
19 §2031.010 et seq.
- 20 2. The term "YOU" or "YOUR" refers to Defendant Coinbase, Inc., including its present and
21 former officers, directors, employees, agents, contractors, attorneys, affiliates, and
22 representatives.
- 23 3. The term "DOCUMENT" means any written, printed, typed, recorded, or electronically stored
24 matter of any kind, whether draft or final, including but not limited to emails, logs, manuals,
25 policies, contracts, and records.
- 26
- 27
- 28

- 1 4. The term “COMMUNICATION” means any oral, written, or electronic transmission of
2 information, including conversations, correspondence, telephone calls, emails, texts, or internal
3 messaging.
- 4 5. Produce all responsive documents in the form in which they are kept in the usual course of
5 business, or organized and labeled to correspond with the categories in these Requests.
- 6 6. If YOU withhold any document on the basis of privilege, provide a privilege log identifying the
7 document, its date, author, recipients, subject matter, and the privilege asserted.
- 8 7. These Requests are deemed continuing and YOU must produce additional responsive documents
9 if they are discovered or created after YOUR initial response.
- 10 8. Unless otherwise specified, the relevant time period is from the date Plaintiff created his
11 Coinbase account to the present.
- 12
- 13
- 14
- 15
- 16

17 Respectfully submitted,

18 Dated: September 24, 2025

19 /s/ Russell Rope
20 *Plaintiff In Pro Per*
21
22
23
24
25
26
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EXHIBIT E3

Petitioner's Discovery Request For Special Interrogatories

Dated: September 24, 2025

- 1 3. State whether Coinbase disclosed Plaintiff's personal identifying information (PII) (including
2 name, email, phone, ID documents, or wallet ownership) to any third party (including
3 contractors, vendors, biometric vendors, domain privacy services, law enforcement, or other
4 customers) from [date] to present. For each disclosure, identify: (a) recipient; (b) date/time; (c)
5 data disclosed; (d) basis for disclosure; (e) production reference if produced.
6
- 7 4. Identify (by name, title, department, vendor) any third-party vendor, contractor, or affiliate that
8 had access to Coinbase's support chat, escalation queue, customer PII, or account administration
9 systems during the period [date] to present.
10
- 11 5. Describe Coinbase's internal procedure for assigning support chats and escalation tickets
12 (include who can reassign, what criteria used, and whether any automated rules route chats by
13 name/keyword/region).
14
- 15 6. Identify any internal or external person(s) who searched for, flagged, or otherwise used
16 Plaintiff's name, email address, domain, or wallet addresses in any internal monitoring, anti-
17 fraud, or moderation systems, and provide dates and reasons.
18
- 19 7. State whether Coinbase has received complaints, reports, or alerts that Plaintiff's personal data
20 was being circulated, used in harassment campaigns, or used in alias account creation. If yes,
21 identify the source, date, and actions taken.
22
- 23 8. Identify all Coinbase employees, agents, or contractors who used aliases or non-work account
24 names to communicate about Plaintiff's account or assets (state dates, content if non-privileged,
25 and any discipline or investigation).
26
- 27 9. Identify every instance Coinbase received a request from any third party to pause, restrict, freeze,
28 or otherwise limit Plaintiff's account, and provide the basis and documentation.

1 10. State whether Coinbase maintained, allowed, or used any “name masking” or alias assignment
2 practices on support channels that would permit internal users or third parties to post or
3 otherwise create display names that impersonate or confuse Plaintiff’s brand or alias, and identify
4 any such policies/instances.
5

6
7 **DEFINITIONS & INSTRUCTIONS:**
8

- 9 1. These Special Interrogatories are propounded pursuant to California Code of Civil Procedure
10 §2030.010 et seq.
11
12 2. The term “YOU” or “YOUR” refers to Defendant Coinbase, Inc., including without limitation its
13 present and former officers, directors, employees, agents, contractors, attorneys, affiliates,
14 representatives, and anyone acting or purporting to act on its behalf.
15
16 3. The term “PLAINTIFF” refers to Russell Rope.
17
18 4. The term “DOCUMENT” is defined as in California Evidence Code §250, and includes without
19 limitation any written, printed, typed, recorded, graphic, photographic, or electronically stored
20 matter of any kind, whether draft or final, including but not limited to emails, chat logs, manuals,
21 policies, internal messages, contracts, and records.
22
23 5. The term “COMMUNICATION” means any transmission of information, whether oral, written,
24 electronic, or otherwise, including but not limited to conversations, meetings, telephone calls,
25 correspondence, emails, texts, and internal messaging.
26
27 6. Each Interrogatory shall be answered separately, fully, and in writing under oath, within the time
28 prescribed by law.

- 1 7. If YOU object to any Interrogatory, state the specific ground(s) for the objection and respond to
2 the extent the Interrogatory is not objectionable.
- 3 8. If YOU cannot answer an Interrogatory in full, answer to the extent possible, specify the reasons
4 for your inability to answer further, and identify any persons or documents that may supply
5 additional information.
- 6 9. If YOU claim that any information responsive to an Interrogatory is privileged, state the nature
7 of the privilege asserted and provide sufficient information to permit PLAINTIFF and the Court
8 to assess the claim (including, where applicable, the date, author, recipient(s), subject matter, and
9 type of document or communication).
- 10 10. These Interrogatories are deemed continuing in nature pursuant to CCP §2030.070, and YOU
11 must provide supplemental responses if additional information becomes available.
- 12 11. Unless otherwise specified, the relevant time period for these Interrogatories is from the date
13 PLAINTIFF created his Coinbase account to the present.
14
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19 Respectfully submitted,

20 Dated: September 24, 2025

21 /s/ Russell Rope
22 *Plaintiff In Pro Per*
23
24
25
26
27
28

EXHIBIT E4

Petitioner's Discovery Request Deposition Notice

Dated: September 24, 2025

1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,
12 Plaintiff,
13 v.
14 COINBASE, INC. & DOES 1-20,
15 Defendants

) Case No.: 25STCV16692
)
) **PLAINTIFF’S NOTICE OF DEPOSITION OF**
) **PERSON(S) MOST KNOWLEDGEABLE OF**
) **DEFENDANT COINBASE, INC.**
)
) **Deposing Party:** Plaintiff Russell Rope
) **Deponent:** PMKs of Defendant Coinbase, Inc.
) **Date/Time of Deposition:** TBD
) **Location:** Los Angeles **Court Reporter:** TBD

20
21 TO: Coinbase, Inc. and its attorneys of record

22
23
24 PLEASE TAKE NOTICE that pursuant to Code of Civil Procedure §§2025.010 et seq. and §2025.230,
25 Plaintiff Russell Rope will take the deposition(s) of the person(s) most knowledgeable at Coinbase, Inc.
26 regarding the topics listed below.
27
28

1 **Topics for Examination**

- 2 1. Policies, procedures, and triggers for account lockouts, including logins from new devices.
- 3
- 4 2. Administrative override capabilities to unlock customer accounts.
- 5
- 6 3. Coinbase’s audit log systems and what data they capture (timestamps, IP, device ID, reasons for
- 7 restriction).
- 8
- 9 4. The specific audit log entries relating to Plaintiff’s account lockout.
- 10
- 11 5. Contracts, policies, or communications with third-party biometric vendors related to account
- 12 verification.
- 13
- 14 6. Policies and internal practices regarding refunds, including whether refunds must be returned to
- 15 the original payment method.
- 16
- 17 7. All facts concerning Plaintiff’s Coinbase One cancellation and subsequent billing/reactivation.
- 18
- 19 8. The decision to issue Plaintiff’s “refund” in USDC rather than to his payment method.
- 20
- 21 9. Coinbase’s record retention and destruction policies for audit logs, billing data, and support
- 22 communications.
- 23
- 24 10. The individuals who approved or implemented actions regarding Plaintiff’s lockout, billing, or
- 25 refund.
- 26
- 27
- 28

1 **DEFINITIONS & INSTRUCTIONS**

- 2 1. This deposition is noticed pursuant to California Code of Civil Procedure §§2025.010 et seq. and
3 §2025.230.
- 4
- 5 2. The term “YOU” or “YOUR” refers to Defendant Coinbase, Inc., including its present and
6 former officers, directors, employees, agents, contractors, attorneys, affiliates, and
7 representatives.
- 8
- 9 3. Pursuant to CCP §2025.230, YOU are required to designate and produce one or more officers,
10 directors, managing agents, employees, or other persons most qualified to testify on the matters
11 specified in the notice.
- 12
- 13 4. The person(s) designated shall testify to matters known or reasonably available to the
14 organization, and such testimony shall be binding on the organization.
- 15
- 16 5. If no single individual has sufficient knowledge to testify as to all matters listed, YOU must
17 designate additional persons to provide complete testimony.
- 18
- 19 6. The deposition will be recorded stenographically, and may also be audio- and video-recorded by
20 Plaintiff.
- 21
- 22 7. These obligations are continuing, and YOU must designate additional person(s) if new
23 information becomes available prior to the deposition.

24
25 Respectfully submitted,

26 Dated: September 24, 2025

27 /s/ Russell Rope
28 *Plaintiff In Pro Per*

EXHIBIT F1

Petitioner's Motion
For Claim & Delivery

Dated: September 24, 2025

1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
310-663-7655
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4 *In Pro Per*

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6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **NOTICE & MOTION FOR ORDER OF**
14 COINBASE, INC. & DOES 1-20,) **CLAIM & DELIVERY**
15 Defendants) Hearing Date: 1/12/25 Time: 8:30am
16) Department: 28 Judge: Hon. Byrdsong
17) CRS ID: 238978093316

18 **NOTICE AND MOTION FOR CLAIM AND DELIVERY**
19

20 Plaintiff Russell Rope, in pro per, moves under CCP § 511.010 et seq. for an order directing immediate
21 return of Plaintiff’s digital property, specifically unique NFTs and related digital assets including Web3
22 Wallet keys for NFT marketplace access wrongfully detained by Defendant Coinbase, Inc.
23

24 **I. INTRODUCTION**
25

26 Plaintiff’s NFTs are unique works of art, chattel property wrongfully withheld. Coinbase has unlawfully
27 detained these assets by locking Plaintiff out of his custodial wallet and refusing access. Claim and
28 delivery is the proper statutory remedy to compel return.

1 **II. FACTUAL BACKGROUND**

- 2 1. Plaintiff minted and listed over 4,000 NFTs, collectively valued at \$2.4 billion (Exhibits A–C,
3 Declaration).
- 4
- 5 2. Coinbase locked Plaintiff out, misrepresenting this as “lost keys,” despite retaining custodial
6 control.
- 7
- 8 3. Plaintiff has suffered irreparable harm as the NFTs are unique, one-of-a-kind assets, not fungible
9 commodities.
- 10 4. Plaintiff is requesting total asset recovery including cryptocurrency, NFTs, and Web3 Wallet
11 keys for access to NFT marketplaces and control of unique usernames and accounts.
12

13 **III. MEMORANDUM OF POINTS & AUTHORITIES**

- 14
- 15 • **CCP § 511.010** permits claim and delivery where personal property is wrongfully detained.
 - 16 • Courts recognize **intellectual property and digital assets** as chattel subject to recovery.
 - 17 • NFTs, like artwork, constitute unique property; monetary damages cannot replace them.
18

19 **IV. RELIEF REQUESTED**

20

21 Plaintiff requests an order directing Coinbase to immediately return Plaintiff’s NFTs and digital assets
22 including access credentials, and authorizing issuance of a writ of possession.
23

24 Respectfully submitted,

25 Corrected: September 29, 2025

26 Dated: September 24, 2025

27 /s/ Russell Rope
28 *Plaintiff In Pro Per*

1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
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4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11) Case No.: 25STCV16692
12)
13) **DECLARATION OF RUSSELL ROPE IN**
14) **SUPPORT OF MOTION FOR**
15) **CLAIM & DELIVERY**
16)
17)
18)
19)
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21)
22)
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25)
26)
27)
28)

RUSSELL ROPE,
Plaintiff,
v.
COINBASE, INC. & DOES 1-20,
Defendants

I, Russell Rope, declare:

1. I am the Plaintiff in this action, in pro per.
2. I created, minted, and listed ~4k NFTs, valued at \$2.4 billion (Exhibits A-C, Opposition Declaration)
4. Defendant Coinbase locked me out of my custodial wallet, detaining these NFTs. Coinbase falsely claimed “lost keys,” though custodial recovery was possible.
5. NFTs are unique, non-fungible works of art. Both their detention and deprivation of marketplace access credentials causes irreparable harm.

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I seek immediate return of these assets under CCP § 511.010 et seq., and declare, to the best of my knowledge, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Respectfully submitted,

Dated: September 24, 2025

/s/ Russell Rope
Plaintiff In Pro Per

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
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4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **[PROPOSED] ORDER GRANTING**
14 COINBASE, INC. & DOES 1-20,) **PLAINTIFF’S MOTION FOR**
15 Defendants) **CLAIM AND DELIVERY**

16
17 **The Court, having considered Plaintiff Russell Rope’s Motion for Claim and Delivery, the**
18 **supporting Declaration and Exhibits A–R (Opposition Declaration, incorporated by reference),**
19 **and all arguments presented, finds as follows:**

- 20
- 21 1. Plaintiff has established a clear right to possession of his NFTs and digital assets under CCP §
 - 22 512.010.
 - 23
 - 24 2. Defendant Coinbase, Inc. is wrongfully detaining Plaintiff’s property through custodial lockout,
 - 25 not loss of keys.
 - 26
 - 27 3. The NFTs constitute unique, non-fungible works of art and intellectual property, rendering
 - 28 monetary damages inadequate.

1 4. Plaintiff has demonstrated irreparable harm, including compounding damages from Ethereum
2 value increases, loss of creative control, and ongoing interference with his ventures.
3

4 **IT IS HEREBY ORDERED:**
5

- 6 1. Plaintiff's Motion for Claim and Delivery is GRANTED.
7
8 2. Defendant Coinbase, Inc. shall immediately return possession of Plaintiff's NFTs and digital
9 assets, including restoring access credentials or equivalent technical access.
10
11 3. If Defendant fails to comply voluntarily, the Clerk of Court shall issue a writ of possession
12 pursuant to CCP § 512.010 et seq. authorizing immediate recovery.
13
14 4. Plaintiff's prior Declaration in Support of Opposition to Compel Arbitration and Stay Proceeding
15 and Exhibits A–R are incorporated as evidentiary support for this relief.
16
17
18

19 **IT IS SO ORDERED.**

Dated: _____

20
21 _____
22 Hon. Rupert A. Byrdsong | *Judge of the Superior Court*
23
24
25
26
27
28

EXHIBIT F2

Petitioner's Motion
For Protective Order

Dated: September 24, 2025

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,
12 Plaintiff,
13 v.
14 COINBASE, INC. & DOES 1-20,
15 Defendants

) Case No.: 25STCV16692
) **NOTICE & MOTION**
) **FOR PROTECTIVE ORDER**
) Hearing Date: 12/10/25 Time: 8:30am
) Department: 28 Judge: Hon. Byrdsong
) CRS ID: 928940852110

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17
18
19 **Plaintiff Russell Rope, in pro per, moves under CCP § 2025.420 for a protective order against**
20 **ongoing harassment, intimidation, and misuse of litigation tactics by Defendant and Does.**

21
22
23 **I. INTRODUCTION**

24 Plaintiff faces harassment, stalking, and threats tied to litigation events. Protective measures are essential
25 to ensure Plaintiff can safely prosecute this action.
26
27
28

1 **II. FACTUAL BACKGROUND**

- 2 1. Plaintiff documented threats, assaults, and coordinated harassment (Exhibits L–M, Opposition
3 Declaration).
- 4
- 5 2. Harassment has escalated during litigation events, suggesting misuse of discovery and leaks of
6 private data.
- 7
- 8

9 **III. MEMORANDUM OF POINTS & AUTHORITIES**

- 10 • **CCP § 2025.420** authorizes protective orders to prevent unwarranted annoyance, embarrassment,
11 oppression, or undue burden.
- 12
- 13 • Courts may fashion protective orders to safeguard litigants against intimidation or abusive tactics
14 (*Armendariz; Lisa M. v. Henry Mayo*).
- 15

16

17 **IV. RELIEF REQUESTED**

18 An order directing:

- 19
- 20 1. Defendant and agents to cease harassment, intimidation, or dissemination of private information;
- 21 2. Law enforcement notification if violations occur.
- 22
- 23

24 Respectfully submitted,

25 Corrected: September 29, 2025

26 Dated: September 24, 2025

27 /s/ Russell Rope
28 *Plaintiff In Pro Per*

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
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4 *In Pro Per*

5
6
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **DECLARATION OF RUSSELL ROPE IN**
14 COINBASE, INC. & DOES 1-20,) **SUPPORT OF MOTION FOR**
15 Defendants) **PROTECTIVE ORDER**

16 **I, Russell Rope, declare:**

- 17 1. I am Plaintiff, in pro per.
- 18 2. I have experienced harassment, intimidation, and threats tied to litigation events (Exhibits L–M,
19 Opposition Declaration).
- 20 3. Harassment has escalated during discovery and court filings, suggesting misuse of private
21 information.
- 22 4. Protective measures are required to ensure discovery proceeds safely.

23
24
25 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
26 correct.

27 Respectfully submitted,

Dated: September 24, 2025

28 /s/ Russell Rope
Plaintiff In Pro Per

1 **RUSSELL ROPE**
ID 1607 POB 1198
2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **[PROPOSED] ORDER GRANTING**
14 COINBASE, INC. & DOES 1-20,) **PLAINTIFF’S MOTION FOR**
15 Defendants) **PROTECTIVE ORDER**

16 **The Court, having considered Plaintiff’s Motion for Protective Order, orders:**
17

- 18 1. Plaintiff’s Motion is GRANTED.
19
20 2. Defendant and its agents shall cease harassment, intimidation, and dissemination of Plaintiff’s
21 private information.
22
23 3. Violations shall be reported to law enforcement.

24 Dated: _____

25 IT IS SO ORDERED.

26 *Hon. Rupert A. Byrdsong | Judge of the Superior Court*
27
28

EXHIBIT F3

Petitioner's Motion For Sanctions

Dated: September 24, 2025

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8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **NOTICE & MOTION FOR SANCTIONS**
14 COINBASE, INC. & DOES 1-20,) Hearing Date: 12/10/25 Time: 8:30am
15 Defendants) Department: 28 Judge: Hon. Byrdsong
16) CRS ID: 967270175389

17 **Plaintiff Russell Rope, in pro per, moves under CCP §§ 128.7 and 2023.010 for sanctions against**
18 **Defendant Coinbase, Inc. and counsel for misrepresentations and abuse of process.**

19
20 **I. INTRODUCTION**

21 Defendant’s filings contain repeated falsehoods, including claims Plaintiff “lost keys” and was
22 “inexperienced,” directly contradicted by exhibits. Delay tactics multiply proceedings, increase costs,
23 and prejudice Plaintiff.
24

25
26 **II. FACTUAL BACKGROUND**

- 27
28 1. Defendant misrepresented app screenshots, terms, and NFT holdings (Exhibit H, Declaration).

1 2. Defendant claimed Plaintiff never listed NFTs, despite listings on OpenSea, Rarible, and Magic
2 Eden (Exhibits A–C, Declaration).

3 3. Defendant falsely minimized Coinbase One fraud as “paused,” contradicted by billing records
4 (Exhibit N, Declaration).
5

6
7 **III. MEMORANDUM OF POINTS & AUTHORITIES**
8

- 9 • **CCP § 128.7** authorizes sanctions for false representations to the Court.
10 • **CCP § 2023.010** authorizes sanctions for misuse of discovery, including delay or obstruction.
11 • Sanctions deter parties from misleading courts or harassing opponents (*In re Marriage of*
12 *Flaherty* (1982) 31 Cal.3d 637).
13
14

15 **IV. RELIEF REQUESTED**
16

17 Monetary and evidentiary sanctions against Defendant and counsel, including:

- 18 1. Attorney’s fees and costs Plaintiff would have incurred but for self-representation;
19
20 2. An order striking misrepresentations from Defendant’s petition;
21
22 3. Referral of counsel’s conduct to the State Bar if warranted.

23 Respectfully submitted,

24 Corrected: September 29, 2025

25 Dated: September 24, 2025

26 /s/ Russell Rope
27 *Plaintiff In Pro Per*
28

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8 COUNTY OF LOS ANGELES
9

10
11) Case No.: 25STCV16692
12)
13) **DECLARATION OF RUSSELL ROPE IN**
14) **SUPPORT OF MOTION FOR SANCTIONS**
15)
16)
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28)

RUSSELL ROPE,
Plaintiff,
v.
COINBASE, INC. & DOES 1-20,
Defendants

I, Russell Rope, declare:

1. I am Plaintiff, in pro per.
2. Defendant has repeatedly misrepresented material facts, including:
 - Claiming I “lost keys” (Exhibit H, Opposition Declaration, disproves).
 - Minimizing Coinbase One fraud (Exhibit N, Opposition Declaration, contradicts).
 - Denying NFT listings (Exhibits A–C, Opposition Declaration, confirm).
3. Defendant’s counsel has multiplied proceedings and obstructed discovery.

1 4. These acts have caused unnecessary delay and prejudice.
2
3

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
5 correct.
6
7

8 Respectfully submitted,

9 Dated: September 24, 2025

10 /s/ Russell Rope
11 *Plaintiff In Pro Per*
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10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **[PROPOSED] ORDER GRANTING**
14 COINBASE, INC. & DOES 1-20,) **PLAINTIFF’S MOTION FOR SANCTIONS**
15 Defendants)

16 **The Court, having considered Plaintiff’s Motion for Sanctions, orders:**
17

- 18 1. Plaintiff’s Motion is GRANTED.
19
20 2. Defendant and counsel are sanctioned under CCP §§ 128.7 and 2023.010.
21
22 3. Sanctions include monetary penalties and striking of misrepresentations from the record.
23
24 4. The Court may refer counsel’s conduct to the State Bar.

25 Dated: _____

26 IT IS SO ORDERED.

27 _____
28 *Hon. Rupert A. Byrdsong | Judge of the Superior Court*

EXHIBIT F4

Petitioner's Motion
For Referral to Law Enforcement

Dated: September 24, 2025

1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
310-663-7655
3 justice@russellrope.com
4 *In Pro Per*

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9

10
11 RUSSELL ROPE,
12 Plaintiff,
13 v.
14 COINBASE, INC. & DOES 1-20,
15 Defendants

) Case No.: 25STCV16692
) **NOTICE & MOTION FOR REFERRAL**
) **TO LAW ENFORCEMENT**
) Hearing Date: 1/12/25 Time: **8:30am**
) Department: **28** Judge: **Hon. Byrdsong**
) CRS ID: **826562563206**

16
17
18 **Plaintiff Russell Rope, in pro per, moves for an order referring the record of this case to law**
19 **enforcement for investigation.**

20 **I. INTRODUCTION**
21

22 The record contains allegations of fraud, theft, stalking, harrassment, threats of violence, assault and
23 coordinated entrapment attempts. These matters exceed civil jurisdiction and implicate criminal law.
24

25 **II. FACTUAL BACKGROUND**
26

- 27 1. Police reports have been made documenting stalking and threats (Exhibits L–M, Declaration).
- 28 2. Bank records confirm fraudulent Coinbase One charges (Exhibit N, Declaration).

1 3. Coinbase misrepresented “refunds,” diverting funds into inaccessible USDC wallets (Exhibit R,
2 Declaration).

3 4. There are other most serious instances of not limited to fraud connected to Does 1-20 not
4 mentioned in this case, but which law enforcement should be investigating.
5

6 **III. MEMORANDUM OF POINTS & AUTHORITIES**

- 7
- 8 • Courts have inherent authority to refer suspected crimes to prosecutors (*People v. Superior Court*
9 (*Greer*) (1977) 19 Cal.3d 255, 262).
 - 10 • Fraud, stalking, and willful injury are outside arbitration and fall squarely under public safety
11 jurisdiction.
12

13 **IV. RELIEF REQUESTED**

14 Referral of the case record, including Plaintiff’s declarations and exhibits, to:
15

- 16 1. Los Angeles Police Department;
17
18 2. Beverly Hills Police Department;
19
20 3. California Governor’s Office (neglecting gubernatorial petition);
21
22 4. Federal Bureau of Investigation.

23 Plaintiff further requests assignment of investigators/detectives to **cooperate with Plaintiff** in resolving
24 these crimes.

25 Respectfully submitted,

26 Corrected: September 29, 2025

27 Dated: September 24, 2025

28 /s/ Russell Rope

Plaintiff In Pro Per

1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
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4 *In Pro Per*

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10
11) Case No.: 25STCV16692
12)
13) **DECLARATION OF RUSSELL ROPE IN**
14) **SUPPORT OF MOTION FOR REFERRAL**
15) **TO LAW ENFORCEMENT**
16)
RUSSELL ROPE,)
Plaintiff,)
v.)
COINBASE, INC. & DOES 1-20,)
Defendants)

17
18 **I, Russell Rope, declare as follows:**

- 19 1. I am the Plaintiff in this action, in pro per. I make this declaration in support of my Motion for
20 Referral to Law Enforcement.
- 21 2. Since initiating this case, I have been subjected to fraud, stalking, threats, assaults, and
22 coordinated entrapment attempts. I have made police reports to LAPD, BHPD, and FBI. (Not
23 limited to Exhibits L–M, Opposition Declaration).
- 24 3. I have also documented fraudulent Coinbase One charges after cancellation, confirmed as fraud
25 by my bank (Exhibit N, Opposition Declaration), and deceptive refund practices (Exhibit R,
26 Opposition Declaration).
27
28

1 4. Additional evidence shows interference with my brand and domain names consistent with
2 racketeering activity (Exhibits F–G, Q, Opposition Declaration).

3 5. These acts go beyond civil disputes. They involve criminal conduct — including fraud, theft,
4 stalking, and coordinated obstruction — which cannot be remedied through arbitration or civil
5 process alone.
6

7 6. Detectives and investigators must be assigned to cooperate directly with me in order to resolve
8 these crimes. Without such cooperation, the patterns of harassment and obstruction will continue.
9

10
11 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
12 correct.
13

14
15 Respectfully submitted,

16 Dated: September 24, 2025

17
18 /s/ Russell Rope
19 *Plaintiff In Pro Per*
20
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1 **RUSSELL ROPE**
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2 Sacramento, CA 95812
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8 COUNTY OF LOS ANGELES
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10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **[PROPOSED] ORDER GRANTING**
14 COINBASE, INC. & DOES 1-20,) **PLAINTIFF’S MOTION FOR REFERRAL**
15 Defendants) **TO LAW ENFORCEMENT**

16 **The Court, having considered Plaintiff’s Motion for Referral to Law Enforcement and supporting**
17 **declaration, and good cause appearing:**
18

19
20 IT IS HEREBY ORDERED:

21 1. The record in this case, including Plaintiff’s declarations and Exhibits A–R (Opposition
22 Declaration), shall be referred to appropriate law enforcement agencies for investigation,
23 including but not limited to:

- 24 • Los Angeles Police Department
- 25 • Beverly Hills Police Department
- 26 • California Governor’s Office
- 27 • Federal Bureau of Investigation
- 28

1 2. Said agencies are directed to assign detectives or investigators to review the record and cooperate
2 directly with Plaintiff to investigate patterns of fraud, stalking, threats, assaults, domain
3 interference, and other misconduct documented in this case.

4 3. Law enforcement shall not engage in surveillance or contact with Plaintiff without his express
5 consent, other than to coordinate investigation.
6

7
8 **IT IS SO ORDERED.**

Dated: _____

9
10 _____
11 *Hon. Rupert A. Byrdsong | Judge of the Superior Court*
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7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 COUNTY OF LOS ANGELES
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10
11 RUSSELL ROPE,) Case No.: 25STCV16692
12 Plaintiff,)
13 v.) **PROOF OF SERVICE OF MOTIONS FOR**
14 COINBASE, INC. & DOES 1-20,) **PROTECTIVE ORDER, ODERS FOR**
15 Defendants) **CLAIM & DELIVERY, REFERALL TO LAW**
16) **ENFORMENT, & SANCTIONS, WITH**
17) **DECLARATIONS & PROPOSED ORDERS**

18 **I, Russell Rope, am the Petitioner in this action, appearing in pro per. I am over the age of 18.**

19 On September 25 2025, I served the following documents:
20

21
22 **1. Motion for Claim and Delivery;**

23 Declaration of Russell Rope in Support; [Proposed] Order Granting Claim and Delivery.

24 **2. Motion for Referral to Law Enforcement;**

25 Declaration of Russell Rope in Support; [Proposed] Order Referring Evidence to Law Enforcement.

26 **3. Motion for Protective Order;**

27 Declaration of Russell Rope in Support; [Proposed] Order Granting Protective Order.
28

1 **4. Motion for Sanctions;**

2 Declaration of Russell Rope in Support; [Proposed] Order Granting Sanctions.

3
4 on counsel for Defendant Coinbase, Inc. by **electronic service**, pursuant to counsel's consent to e-
5 service, by sending true and correct copies to the following email addresses:

- 6
- 7 • Celine Purcell – cpurcell@nortonlaw.com
 - 8 • Josephine Petrick – jpetrick@nortonlaw.com
- 9

10
11 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
12 correct.

13
14
15 Respectfully submitted,

16 Dated: September 25, 2025

17
18 /s/ Russell Rope
19 *Plaintiff In Pro Per*