

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 4 OF 4

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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
- ★**O** — Plaintiff's Declaration Summarizing Continued Harm

EXHIBIT K1

Request for Statement of Decision
Filed by Defendant

Dated: November 25, 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

**DEFENDANT COINBASE, INC.'S REQUEST
FOR STATEMENT OF DECISION ON
PETITION TO COMPEL ARBITRATION**

Date: November 26, 2025
Time: 8:30 a.m.
Dept.: 28

Reservation ID: 091839116039

Defendant Coinbase, Inc. submits the following request for statement of decision on Defendant's petition to compel arbitration, filed August 20, 2025, under Code of Civil Procedure section 632 and California Rule of Court 3.1590, subdivisions (d) and (n).

I. LEGAL STANDARD

In a nonjury trial, the trial court is required to render a statement of decision on a party's timely request. The decision must explain the factual and legal basis for the trial court's decision as to each of the principal controverted issues for which the statement was requested. (Code Civ. Proc., § 632.) Although generally, the trial court need not issue a statement of decision after a ruling on a motion (*In re Marriage of Turkanis & Price* (2013) 213 Cal.App.4th 332, 353; *In re Marriage of Askmo* (2000) 85 Cal.App.4th 1032, 1040; *Lavine v. Hospital of the Good Samaritan* (1985) 169 Cal.App.3d 1019, 1026), the statement of decision procedure applies to petitions to compel arbitration that involve controverted factual issues (see Code Civ. Proc., § 1291 ["A statement of decision shall be made by the court, if requested pursuant to Section 632, whenever an order or judgment, except a special order after final judgment, is made that is appealable under this title[,] that is, the California Arbitration Act]; Code Civ. Proc., § 632; *Acquire II, Ltd. v. Colton Real Estate Group* (2013) 213 Cal.App.4th 959, 970 ["California's statutory scheme regarding contractual arbitration ... requires a statement of decision for any ruling denying a motion to compel arbitration if a party requests one."]; *Metis Development LLC v. Bohacek* (2011) 200 Cal.App.4th 679, 687–688, as modified (Oct. 19, 2011)).

"When a trial is completed within one day or in less than eight hours over more than one day, a request for statement of decision must be made before the matter is submitted for decision" (Cal. R. Ct. 3.1590(n).)

II. BACKGROUND

Coinbase filed its petition to compel arbitration on August 20, 2025. The hearing on the petition is scheduled for Wednesday, November 26, 2025, at 8:30 a.m. Coinbase makes this request for a statement of decision before the matter is submitted for decision. (See Cal. R. Ct. 3.1590(n).)

III. REQUEST FOR STATEMENT OF DECISION

In the event the Court denies Coinbase's Petition to Compel Arbitration, and without characterizing any of the issues below as ones of fact or law, Coinbase respectfully requests a statement

of decision on the following issues, in addition to any that may be identified at the hearing on the petition to compel arbitration:

1. Whether Plaintiff Russell Rope assented to the Coinbase User Agreement in effect on November 26, 2023 (“2023 User Agreement”), or, in the alternative, whether Mr. Rope concedes (implicitly or explicitly) that he assented to this version of the User Agreement.
2. If the Court reaches the issue of waiver by litigation conduct, whether Coinbase preserved or waived the right to compel arbitration.
3. Whether Mr. Rope seeks public or private injunctive relief.
4. If the Court reaches the issue of scope, whether any of Mr. Rope’s claims are outside the scope of the 2023 User Agreement arbitration clause, and if so, why.
5. If the Court reaches unconscionability, whether the operative delegation clause is conscionable or unconscionable, and whether any unconscionable terms can be severed.
6. If the Court reaches unconscionability, whether the operative arbitration agreement is conscionable or unconscionable, and whether any unconscionable terms can be severed.

Dated: November 25, 2025

Respectfully submitted,

THE NORTON LAW FIRM PC

/s/ Josephine K. Petrick

Josephine K. Petrick
Attorneys for Defendant
COINBASE, INC.

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):

- **DEFENDANT COINBASE, INC.'S REQUEST FOR STATEMENT OF DECISION ON PETITION TO COMPEL ARBITRATION**

on the parties listed below by the following means:

(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
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: November 25, 2025

/s/ Jacob Bedwell

Jacob Bedwell

EXHIBIT K2

Response to & Request for SOD
Filed by Plaintiff

Dated: November 25, 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
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10
11 RUSSELL ROPE,

12 Plaintiff,

13 v.

14 COINBASE, INC. & DOES 1-20,

15 Defendants

) Case No.: 25STCV16692

) **PLAINTIFF’S RESPONSE TO**
) **DEFENDANT’S REQUEST FOR**
) **STATEMENT OF DECISION**

) **Date:** November 26, 2025 **Time:** 8:30 a.m.

) **Department:** 28 – Hon. Rupert A. Byrdsong

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19 **Plaintiff Russell Rope, appearing in pro per, respectfully submits this Response to Defendant**
20 **Coinbase, Inc.’s “Request for Statement of Decision” filed November 25, 2025.**

21
22 **I. INTRODUCTION**

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Coinbase’s request is procedurally unnecessary, substantively incorrect, and improperly attempts to narrow and redefine the issues before the Court. Although Plaintiff does not oppose issuance of a Statement of Decision should the Court independently elect to prepare one, Coinbase’s filing misstates the applicable law, omits critical controverted issues, and seeks to confine the Court’s analysis to Coinbase’s preferred framing.

1 To ensure a complete and accurate record, Plaintiff submits this response clarifying (1) the legal
2 standards governing Statements of Decision; (2) Coinbase’s failure to establish any factual conflicts
3 requiring one; and (3) the full set of controverted issues that must be addressed **if** the Court issues such a
4 statement.

7 **II. A STATEMENT OF DECISION IS NOT REQUIRED ON A MOTION**

8 California Code of Civil Procedure § 632 applies to trials, not motions.

9 The California Supreme Court has held repeatedly that **Statements of Decision are not required for**
10 **rulings on motions**, including petitions to compel arbitration.

11 See:

- 12 • *Talla v. Asbestos Corp. Ltd.* (2019) 37 Cal.App.5th 983, 999 – Statements of Decision are not
13 required on motions.
- 14 • *People v. Snook* (1997) 16 Cal.4th 1210, 1215 – §632 applies to trials, not motion rulings.
- 15 • *In re Marriage of Askmo* (2000) 85 Cal.App.4th 1032, 1040 – A Statement of Decision is not
16 required where a court resolves a motion based on declarations and legal argument.
- 17
- 18
- 19

20 Thus, Coinbase’s request is **not mandatory** and does not bind the Court unless the Court wishes to issue
21 a statement voluntarily.

24 **III. COINBASE’S PROPOSED “PRINCIPAL ISSUES” ARE INCOMPLETE, MISSTATED, &** 25 **OMIT THE ACTUAL CONTROVERTED ISSUES**

26 Coinbase attempts to define six “principal issues,” all narrowly tailored to portray alleged user assent
27 while ignoring the central factual and legal disputes before the Court.
28

1 The actual controverted issues include the following, all of which have been fully briefed:
2
3

4 **1. Coinbase has not met its burden to prove assent to arbitration.**

5 Under *Rosenthal v. Great Western Fin. Securities Corp.* (1996) 14 Cal.4th 394, 413, the party seeking
6 arbitration must prove assent with competent, admissible evidence. Coinbase has offered:

- 7 • no evidence Plaintiff ever saw the relevant Terms of Service;
- 8 • no evidence which specific version was operative;
- 9 • unauthenticated screenshots;
- 10 • attorney declarations lacking personal knowledge;
- 11 • no business-records custodian;
- 12 • no metadata, logs, or acceptance records.
- 13
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19 **2. The delegation clause cannot be enforced absent proof of assent.**

20 See *Aanderud v. Superior Court* (2017) 13 Cal.App.5th 880, 892.
21
22

23 **3. Plaintiff's claims involve fraud, malice, and criminal conduct, which are not arbitrable.**

24 Under California law and public policy:
25

- 26 • Fraud in the execution
- 27 • Fraud in the inducement
- 28

- Criminal activity
- Public-interest exceptions

all bar enforcement of arbitration and delegation clauses.

4. The arbitration clause is unconscionable.

See *Armendariz v. Foundation Health* (2000) 24 Cal.4th 83.

5. Coinbase has waived arbitration.

See *St. Agnes Med. Ctr. v. PacifiCare* (2003) 31 Cal.4th 1187; *Quach v. California Commerce Club* (2024) __ Cal.5th __ (prejudice not required).

6. Coinbase’s evidence is inadmissible.

See:

- Evidence Code §§ 350, 352, 403, 702, 1552
- *People v. Goldsmith* (2014) 59 Cal.4th 258 (authentication of digital evidence).
- *Aguimatang v. Caltrans* (1992) 202 Cal.App.3d 241 (attorney declarations cannot supply facts outside personal knowledge).

7. Coinbase conflates Coinbase.com, Coinbase Wallet, and other products.

This creates factual confusion and independent grounds to deny arbitration.

1 **8. Coinbase cannot compel arbitration as to Does 1–20.**

2
3
4 **9. Public policy prohibits using arbitration to conceal criminal misconduct or prevent discovery**
5 **needed to identify perpetrators.**

6 All of these points are omitted from Coinbase’s framing and must be included if the Court elects to issue
7 a Statement of Decision.

8
9
10 **IV. IF THE COURT ISSUES A STATEMENT OF DECISION, IT MUST ADDRESS ALL**
11 **CONTROVERTED ISSUES**

12
13 Should the Court prepare a Statement of Decision, Plaintiff respectfully requests that it address the
14 following:

- 15 1. Coinbase’s failure to prove assent with competent evidence.
- 16 2. The unenforceability of the delegation clause absent proof of assent.
- 17 3. Fraud, malice, and criminal conduct exceptions to arbitration.
- 18 4. Unconscionability.
- 19 5. Waiver of arbitration.
- 20 6. Public policy concerns.
- 21 7. Coinbase’s evidentiary defects and failure of authentication.
- 22 8. Coinbase’s conflation of distinct platforms.
- 23 9. Arbitrability of Doe defendants.
- 24
- 25
- 26
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1 10. Coinbase’s litigation conduct and discovery obstruction.

2 This ensures the record is complete and preserves judicial clarity on all contested issues.

3
4
5 **V. CONCLUSION**

6 Because a Statement of Decision is not required on a motion and Coinbase has not established any basis
7 for mandatory issuance, Plaintiff submits this response to ensure the Court is not constrained by
8 Coinbase’s selective framing.
9

10
11 Plaintiff has no objection if the Court elects to issue a Statement of Decision **so long as it encompasses**
12 **all controverted factual and legal issues**, not merely those identified by Defendant.
13
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16

17 Respectfully submitted,

18 Dated: November 25, 2025

19 /s/ Russell Rope
20 *Plaintiff In Pro Per*
21
22
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1 **[PROPOSED] ORDER REGARDING DEFENDANT COINBASE, INC.’S REQUEST FOR**
2 **STATEMENT OF DECISION**

3
4 The Court has reviewed Defendant Coinbase, Inc.’s “Request for Statement of Decision” and Plaintiff’s
5 Response.
6

7
8 Having reviewed the submissions and applicable law, the Court orders as follows:
9

- 10 1. A Statement of Decision is **not required** for rulings on motions, including a Petition to Compel
11 Arbitration and Motion to Stay Proceedings. (See *Talla v. Asbestos Corp. Ltd.* (2019) 37
12 Cal.App.5th 983; *In re Marriage of Askmo* (2000) 85 Cal.App.4th 1032; Code Civ. Proc. § 632.)
13
14 2. To the extent the Court elects **in its discretion** to issue a written explanation of its ruling, such
15 explanation shall not be limited to the issues identified unilaterally by Defendant. Any such
16 statement must address **all** controverted factual and legal issues placed before the Court by both
17 parties.
18
19 3. Those issues include, but are not limited to:
20 a. Whether Defendant has met its burden to prove Plaintiff assented to any arbitration agreement
21 or Terms of Service;
22 b. Whether any delegation clause is enforceable absent proof of assent;
23 c. Whether allegations involving fraud, malice, and criminal conduct render arbitration
24 unavailable as a matter of California law and public policy;
25 d. Whether the alleged arbitration agreement is procedurally and substantively unconscionable;
26 e. Whether Defendant has waived the right to compel arbitration;
27
28

1 f. Whether Defendant’s evidence is inadmissible or unauthenticated;

2 g. Whether the conflation of Coinbase.com, Coinbase Wallet, and other platforms creates factual
3 uncertainty;

4 h. Whether Does 1–20 can be compelled to arbitrate; and

5 i. Any other issues properly raised in the parties’ filings.

6
7 4. The Court therefore **declines to adopt Defendant’s proposed list** as the exclusive set of issues
8 for any written ruling.

9
10
11 IT IS SO ORDERED.

12
13
14 Dated: _____

15
16 HON. RUPERT A. BYRDSONG

17 Judge of the Superior Court
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1 **PROOF OF SERVICE**

2 (Code Civ. Proc. § 1010.6; Cal. Rules of Court, Rules 2.251 & 3.250)

3
4 I, **Russell Rope**, declare:

5
6 I am over the age of 18 and in pro per.

7 My business address is:

8 ID 1607, P.O. Box 1198, Sacramento, CA 95812.

9 My email address is: justice@russellrope.com

10
11
12 On **November 25, 2025**, I served the following document(s):

13
14 **PLAINTIFF’S RESPONSE TO DEFENDANT’S REQUEST FOR STATEMENT OF DECISION**
15 **[PROPOSED] ORDER REGARDING SAME**

16
17 by electronically serving the document(s) through the Court-approved e-filing and e-service system,

18 **OneLegal**, which provides electronic service to all counsel of record in this matter pursuant to Code of
19 Civil Procedure § 1010.6 and California Rules of Court 2.251.

20
21 The recipients are:

22
23 **The Norton Law Firm PC**

24 Celine Purcell – cpurcell@nortonlaw.com

25 Josephine Petrick – jpetrick@nortonlaw.com

26 Emily Kirk – ekirk@nortonlaw.com

1 300 Frank H. Ogawa Plaza, Suite 450

2 Oakland, CA 94612

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 Submitted on **November 25, 2025**, at Los Angeles, California.
8
9

10 /s/ Russell Rope
11 *Plaintiff In Pro Per*
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EXHIBIT L1

Notice of Intent
to Seek Reconsideration or Writ Relief

Dated: December 4, 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

12 Plaintiff,

13 v.

14 COINBASE, INC. & DOES 1-20,
15

16 Defendants
17

) Case No.: 25STCV16692

) **PLAINTIFF’S NOTICE OF INTENT TO**
) **SEEK RECONSIDERATION**
) **&/OR EXTRAORDINARY WRIT RELIEF**
) **REGARDING ORDER GRANTING**
) **PETITION TO COMPEL ARBITRATION**

) **Department: 28 – Hon. Rupert A. Byrdsong**
18

19 **NOTICE**
20

21 Plaintiff respectfully gives **formal notice** that he intends to:

22
23 **1. File a Motion for Reconsideration (CCP § 1008(b))**

24 based on **new and different facts**, including but not limited to:

- 25
26
 - More than 10-year pattern of fraud and malice
 - biometric lockout misconduct
27
28

- newly compiled evidence from federal RICO claim
- evidence connecting Coinbase’s vendors/partners to prior criminal patterns
- additional technical materials disproving Coinbase’s “impossibility” claims
- supplementary evidence showing lack of assent to arbitration

2. Seek Extraordinary Relief (Writ of Mandate/Prohibition)

if reconsideration is denied.

This Notice preserves Plaintiff’s rights and informs the Court and parties that Plaintiff is preparing the required evidentiary record.

MEMORANDUM OF POINTS & AUTHORITIES

I. CCP § 1008(b) Permits Reconsideration at Any Time Before Judgment

The statute allows reconsideration based on new facts, new law, or new circumstances.

There is **no 10-day limit**.

II. Newly Discovered Evidence Necessitates Reconsideration

Plaintiff will present:

- RICO complaint & something like 100 new exhibits

- evidence of ongoing concerted fraud
- technical evidence disproving Coinbase’s assertions
- new records of biometric system misconduct
- newly explained communications and patterns

The new evidence also includes documentation of discriminatory effects from the biometric verification requirement, which disproportionately impacted Plaintiff due to documented medical conditions and constitutes new circumstances relevant to reconsideration under CCP § 1008(b). These issues were not previously evaluated by the Court and materially affect enforceability of the arbitration clause.

These facts were not presented at the hearing and materially affect the outcome.

III. A Writ of Mandate Will Be Sought if Necessary

Arbitration orders are reviewable only via writ.

This Notice preserves all rights.

DECLARATION OF RUSSELL ROPE

1. I am the Plaintiff.
2. I intend to file a Motion for Reconsideration under CCP § 1008(b).

1 3. I have identified new evidence tying this case to a larger pattern of fraud and misconduct, as well
2 as new information concerning the discriminatory effect of the biometric lockout.

3 4. I require the Statement of Decision to identify omissions and legal error.
4

5 5. If reconsideration is denied, I intend to seek writ review.
6

7 I declare this under penalty of perjury.
8

9 Submitted on December 4, 2025

10 /s/ Russell Rope

11 *Plaintiff In Pro Per*
12
13
14

15
16 **[PROPOSED] ORDER**

17 **RE: NOTICE OF INTENT TO SEEK RECONSIDERATION / WRIT RELIEF**
18

19 The Court acknowledges Plaintiff's Notice of Intent.

20 No further order is required.
21

22
23 IT IS SO ORDERED.
24

25 Date: _____

26 _____
27 Hon. Rupert A. Byrdsong

28 Judge of the Superior Court

1 **PROOF OF SERVICE**

2 I am over the age of 18 and plaintiff in pro per. My address is:

3 ID 1607 POB 1198, Sacramento, CA 95812.
4

5
6 On the date below, I served the following:

7 **PLAINTIFF’S NOTICE OF INTENT TO SEEK RECONSIDERATION / WRIT RELIEF**

8 on all counsel of record via electronic service to:
9

- 10 • jpetrick@nortonlaw.com
- 11 • cpurcell@nortonlaw.com
- 12 • ekirk@nortonlaw.com
- 13
- 14

15
16 I declare under penalty of perjury that the foregoing is true.
17

18 Submitted on **December 4, 2025**

19 **/s/ Russell Rope**

20 *Plaintiff In Pro Per*
21
22
23
24
25
26
27
28

EXHIBIT L2

Request for Immediate Entry of SOD / Clarification

Dated: December 4, 2025

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

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

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

) Case No.: 25STCV16692
) **PLAINTIFF’S REQUEST FOR IMMEDIATE**
) **ENTRY OF STATEMENT OF DECISION**
) **REGARDING ORDER GRANTING**
) **PETITION TO COMPEL ARBITRATION**
) **(CCP § 632 ; CRC 3.1590)**
) **Hearing: None; Request Submitted on the Record**
) **Department: 28 – Hon. Rupert A. Byrdsong**

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20 **NOTICE & REQUEST**

21
22 Plaintiff respectfully requests that the Court **issue the Statement of Decision** required under **Code of**
23 **Civil Procedure § 632** and **California Rules of Court 3.1590**, following Defendant’s timely **Request**
24 **for Statement of Decision** filed on November 25, 2025.

25
26
27 The Court’s ruling on November 26, 2025 granted Defendant’s Petition to Compel Arbitration.
28 A minute order was entered, but **no Statement of Decision has yet been issued.**

1 Because the Statement of Decision is legally required — and essential for Plaintiff’s forthcoming motion
2 for reconsideration and preservation of appellate rights — Plaintiff requests that the Court promptly
3 enter one.
4

5
6
7 **MEMORANDUM OF POINTS & AUTHORITIES**
8

9 **I. A STATEMENT OF DECISION IS MANDATORY WHEN REQUESTED**
10

11 Under **CCP § 632**, where the Court’s ruling involves determination of controverted issues of fact, and a
12 party timely requests a Statement of Decision, the Court **must** issue one. Coinbase filed a timely
13 request. Therefore, a Statement of Decision is required.
14

15
16 **II. CRC 3.1590 REQUIRES THE COURT TO DIRECT PREPARATION OF THE**
17 **STATEMENT**
18

19 California Rule of Court **3.1590(d)**:

20 “The court must prepare or order the prevailing party to prepare a proposed statement of
21 decision.”
22

23 No such instruction or draft has yet appeared in the docket.
24
25
26
27
28

1
2 **III. PROMPT ISSUANCE IS NECESSARY TO PRESERVE RIGHTS TO**
3 **RECONSIDERATION & WRIT REVIEW**

4 A Statement of Decision is required to:

- 5
- 6 • identify all factual findings
- 7
- 8 • show which arguments were accepted or rejected
- 9
- 10 • identify omissions or legal error
- 11 • preserve Plaintiff's record for reconsideration
- 12 • preserve rights for writ relief under CCP § 1085/1103
- 13
- 14

15 Without a Statement of Decision, appellate rights are impaired.

16

17

18 Additionally, Plaintiff anticipates seeking reconsideration based in part on issues of fraud, malice, and
19 discriminatory effect arising from the biometric lockout, none of which were substantively addressed
20 during the hearing. A Statement of Decision is therefore essential to determine whether the Court
21 reached or omitted findings on these material issues, and to ensure Plaintiff can properly frame his
22 motion under CCP § 1008(b).
23
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1 **IV. PLAINTIFF RESPECTFULLY REQUESTS ISSUANCE WITHOUT DELAY**

2 This request is not duplicative and imposes no burden. It simply ensures compliance with CCP § 632
3 and CRC 3.1590.
4

6 **DECLARATION OF RUSSELL ROPE**

7
8
9 I, **Russell Rope**, declare:

- 10
- 11 1. I am the Plaintiff in this action.
 - 12 2. On November 26, 2025, the Court granted Defendant’s Petition to Compel Arbitration.
 - 13 3. Defendant filed a **Request for Statement of Decision** on November 25, 2025.
 - 14 4. As of the date of this filing, **no Statement of Decision appears in the docket.**
 - 15 5. I intend to file a CCP § 1008(b) Motion for Reconsideration and require the Statement of
16 Decision to identify the Court’s findings and omissions.
17
 - 18 6. This request is made in good faith.
19
20

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing is true.
23

24 Submitted on **December 4, 2025**

25 **/s/ Russell Rope**

26 *Plaintiff In Pro Per*
27
28

1 **PROPOSED ORDER RE: REQUEST FOR ENTRY OF STATEMENT OF DECISION**

2
3 The Court, having reviewed Plaintiff’s Request for Immediate Entry of Statement of Decision, orders as
4 follows:

- 5 1. Pursuant to **CCP § 632** and **CRC 3.1590**, the Court **will issue a Statement of Decision**
6 regarding the November 26, 2025 ruling on Defendant’s Petition to Compel Arbitration.
7
8 2. The Statement of Decision shall be filed within the time permitted by CRC 3.1590.
9
10 3. The prevailing party may be instructed to prepare a proposed Statement of Decision.

11 IT IS SO ORDERED.

12 Date: _____

14 Hon. Rupert A. Byrdsong
15 Judge of the Superior Court

1 **PROOF OF SERVICE**

2 I am over the age of 18 and plaintiff in pro per. My address is:

3
4 ID 1607 POB 1198, Sacramento, CA 95812.

5
6 On the date below, I served the following:

7
8 **PLAINTIFF’S REQUEST FOR IMMEDIATE ENTRY OF STATEMENT OF DECISION**

9 on all counsel of record via electronic service to:

- 10
11 • jpetrick@nortonlaw.com
12 • cpurcell@nortonlaw.com
13 • ekirk@nortonlaw.com
14

15
16 I declare under penalty of perjury that the foregoing is true.
17

18 Submitted on **December 4, 2025**

19 /s/ Russell Rope

20 *Plaintiff In Pro Per*
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EXHIBIT M

Emails to Court
Respectful Diligence Regarding SOD Status

Dated: February, 2026

Subject: !?!? Re: Following Up Re: Case No. 25STCV16692 — Status Inquiry re Statement of Decision
From: Russell Rope <justice@russellrope.com>
Date: 2/25/2026, 4:06 PM
To: smcdept28@lacourt.org
CC: "justice@russellrope.com" <justice@russellrope.com>

Dear Department 28 Clerk,

Following up on my prior inquiries, I am requesting an update on the status of the Statement of Decision requested under CCP § 632 and CRC 3.1590 after the Court's ruling on November 26, 2025. Please confirm receipt of this email and whether (1) the Statement of Decision is under submission, and (2) whether the Court has directed any party to prepare a proposed Statement of Decision and, if so, the date of that direction. If any additional step is required by me to obtain the Statement of Decision, please advise.

Respectfully,
Russell Rope, Plaintiff In Pro Per
Case No. 25STCV16692

On 2/17/2026 6:44 PM, Russell Rope wrote:

Hello,

I am respectfully following up on the below email regarding the Statement of Decision in the above-referenced matter. As of today, I do not see an entry in the Register of Actions.

Please confirm receipt of this message and advise if there is an anticipated timeline for issuance or if anything further is required from my end.

Thank you for your time.

Respectfully,
Russell Rope

On 2/5/2026 9:42 AM, Russell Rope wrote:

Dear Department 28 Clerk,

Good morning.

I am writing to respectfully inquire about the status of the Statement of Decision in the above-referenced matter, Rope v. Coinbase, Inc., Case No. 25STCV16692.

The Court heard Defendant's Petition to Compel Arbitration on November 26, 2025. Both parties filed requests for a Statement of Decision on November 25, 2025. I subsequently filed a Request for Immediate Entry of Statement of Decision and a Notice of Intent on December 4, 2025, both of which appear on the docket.

As of today, I do not see a Statement of Decision entered in the Register of Actions. I am writing to confirm whether the Statement of Decision is forthcoming or whether any additional steps are required on my part.

Thank you very much for your time and assistance.

Respectfully,
Russell Rope
Plaintiff, In Pro Per
Case No. 25STCV16692
justice@russellrope.com
310-663-7655

EXHIBIT N

Declaration Summarizing Hearing From Petitioner's Memory & Perspective

Dated: March 10, 2026

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.

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

**DECLARATION OF RUSSELL ROPE
SUMMARIZING HEARING**

Rope v. Coinbase – Exhibit N: Declaration of Summarizing Hearing – 1 of 5

EXHIBIT N | DECLARATION OF RUSSELL ROPE

SUMMARY OF HEARING ON PETITION TO COMPEL ARBITRATION

I, Russell Rope, declare as follows:

1. I am the Petitioner in this matter and appear in pro per. I have personal knowledge of the facts stated in this declaration and could competently testify to them if called as a witness.
 2. This declaration summarizes the hearing in Los Angeles Superior Court regarding Real Party in Interest Coinbase, Inc.'s Petition to Compel Arbitration in Case No. 25STCV16692 before the Honorable Rupert A. Byrdsong, Department 28.
 3. A court reporter transcript of the hearing is not presently available to Petitioner. This declaration is therefore provided to summarize the proceedings and the issues presented to the court.
-

Issues Presented at the Hearing

4. In opposing Coinbase's Petition to Compel Arbitration, Petitioner disputed the existence of any enforceable agreement to arbitrate and raised multiple evidentiary and legal objections, including:
 - Lack of authenticated evidence establishing assent to any arbitration agreement;
 - Absence of any identified version of the Coinbase User Agreement allegedly governing Petitioner's account;
 - Lack of evidence linking the screenshots or documents submitted by Coinbase to Petitioner's account or the time of alleged assent;

Rope v. Coinbase – Exhibit N: Declaration of Summarizing Hearing – 2 of 5

- Objections to the admissibility and foundation of Coinbase’s submitted materials.
 - Malicious and oppressive criminal conduct that California courts do not send to arbitration.
5. Petitioner filed written Opposition and Evidentiary Objections addressing these issues prior to the hearing.
-

Discussion During the Hearing

6. At the outset of the hearing, before hearing argument from either party, the Court stated that it was inclined to rule in favor of Real Party in Interest Coinbase, Inc., without providing any explanation or basis for that inclination.
7. Prior to the hearing, the Court canceled the scheduled Case Management Conference and consolidated it with the hearing on Coinbase's Petition to Compel Arbitration. Petitioner submits that this procedural maneuver denied Petitioner the opportunity for a separate case management conference at which scheduling, discovery, and other pretrial matters could have been addressed independently of the arbitration petition.
8. During the hearing, the Court asked Petitioner why he objected to arbitration.
9. Petitioner explained that he disputed the existence of any valid agreement to arbitrate and that Coinbase had not produced competent evidence proving contract formation or assent.
10. Petitioner further explained that arbitration would materially impair discovery and judicial oversight in a dispute involving significant digital assets and alleged misconduct.
11. During the hearing, the Court sua sponte raised skepticism regarding the use of artificial

intelligence tools in legal work, despite the fact that Petitioner had made no reference to artificial intelligence in any filing or during any proceeding in this matter.

12. The Court also, without basis in the record, suggested that Petitioner's prospects were diminished by the absence of counsel and inquired whether Petitioner had consulted with an attorney.

13. Petitioner responded that his father is an attorney, that Petitioner has discussed AI tools and their limitations with his father, that Petitioner is aware of and has personally identified instances of AI hallucination including an incorrect judicial name that appeared in an AI-generated output, and that Petitioner has more than ten years of pro per litigation experience across multiple levels of court — experience that substantially predates the existence of AI tools.

Lack of Factual Findings

14. At the hearing, Petitioner reiterated that Coinbase had not authenticated any specific User Agreement or demonstrated that Petitioner affirmatively agreed to arbitration.

15. Petitioner also argued that the evidentiary submissions by Coinbase consisted primarily of generic screenshots and documents that were not tied to Petitioner's account or the time period of alleged assent.

16. Despite these disputed issues of contract formation and evidentiary objections, the Court did not conduct an evidentiary hearing or make express factual findings resolving the formation dispute.

17. The Court subsequently issued a Minute Order dated November 26, 2025 granting Coinbase's Petition to Compel Arbitration and staying the action.

18. The Minute Order does not contain findings resolving the disputed issues of contract formation, authentication of electronic records, or Petitioner's evidentiary objections.

Statement of Decision

19. On November 25, 2025, both parties filed Requests for Statement of Decision concerning the arbitration ruling.

20. As of the filing of the present petition, Petitioner has not received a Statement of Decision addressing the disputed formation issues raised in the opposition.

Purpose of Declaration

21. This declaration is submitted to assist the Court of Appeal in understanding the nature of the issues presented to the trial court and the absence of factual findings resolving the disputed formation issues raised in connection with the Petition to Compel Arbitration.

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

Respectfully submitted,

Dated: March 10, 2026

/s/ Russell Rope
Petitioner In Pro Per
justice@russellrope.com

EXHIBIT O

Plaintiff's Declaration
Summarizing Continued Harm

Dated: March 10, 2026

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.

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

**DECLARATION OF RUSSELL ROPE
SUMMARY OF CONTINUED HARM**

Rope v. Coinbase – Exhibit O: Declaration of Continued Harm – 1 of 12

EXHIBIT O | DECLARATION OF RUSSELL ROPE

SUMMARY OF CONTINUED HARM

I, Russell Rope, declare as follows:

I. INTRODUCTION

1. I am the Petitioner in this matter and appear in pro per. I have personal knowledge of the facts stated in this declaration and could competently testify to them if called as a witness.
2. This declaration is submitted to summarize the ongoing harm Petitioner continues to experience as a result of Coinbase's restrictions on Petitioner's account and the trial court's order compelling arbitration and staying the action.

II. ACCOUNT ACCESS AND ASSET CONTROL

3. Petitioner owns a Coinbase account associated with a Web3 Wallet containing digital assets including cryptocurrency and non-fungible tokens ("NFTs").
4. Beginning in approximately April 2025, Petitioner was completely locked out of the Web3 Wallet.
5. Upon attempting to regain access, Coinbase imposed additional biometric verification demands as a condition of restoration — demands that were not part of the account creation process when Petitioner originally established the account.
6. As a result of this lockout, Petitioner has been completely unable to access or manage digital assets associated with the account.

III. NATURE AND VALUE OF DIGITAL ASSETS

7. The assets associated with the Web3 Wallet include NFTs (artworks) that are unique digital property recorded on blockchain networks.
8. The NFT collections represent more than two years of full-time creative and technical labor — in excess of 4,320 hours — with labor value estimated at \$300,000 to \$500,000 based on applicable industry rates. The approximately 4,000 NFTs have been listed on OpenSea, Rarible, and Magic Eden with a collective asking price of \$2.4 billion reflecting Petitioner's assessment of the art's value and long-term appreciation strategy. Petitioner additionally lost approximately \$50,000 in NFT offers as a direct result of the lockout, and the CSVG token presale — 150 million tokens structured for a targeted raise of approximately \$45 million at a \$500 million launch market cap, with 100x growth potential to a \$50 billion market cap — was disrupted at the point of imminent launch, after Petitioner had completed smart contract development, minted and distributed tokens across multiple purpose wallets, deployed a presale dApp, executed marketing campaigns, and was actively pitching investors. In the alternative, Petitioner seeks \$1 billion or more in compensatory and punitive damages for total asset loss, reserving federal RICO rights.
9. These figures are provided to establish the scope of Petitioner's harm and are not intended to suggest that monetary compensation would constitute adequate relief in lieu of return of the assets themselves. The assets are unique and irreplaceable works of art and blockchain-verified property whose loss, transfer, or destruction may not be fully compensable by monetary damages under any measure. They were specifically intended to fund resolution of Petitioner's housing instability, making their continued inaccessibility a direct and ongoing contributor to that condition.

IV. HOUSING INSTABILITY

10. Petitioner has been without stable housing throughout the entirety of this litigation. The digital assets held in the restricted Coinbase account represent Petitioner's primary means of securing stable housing, as the proceeds from these assets were specifically directed toward resolving that instability.
11. The continued restriction on account access directly perpetuates Petitioner's housing instability. That instability has itself been compounded by the same coordinated pattern of interference — attributed to Doe defendants whose identities, though suspected, remain unconfirmed absent the discovery that the arbitration order has foreclosed — that Petitioner believes is connected to the lockout and Coinbase's refusal to restore access. The financial harm caused by the account restrictions cannot be disentangled from the broader pattern of coordinated deprivation Petitioner has experienced, and together they constitute ongoing irreparable harm that cannot be adequately remedied after the fact.

V. BUSINESS DISRUPTION

12. Petitioner owns and operates three licensed business entities, including RRP OG LLC, a California general corporation, and a multi-state IRS 501(c)(3) nonprofit organization, in addition to active NFT collections and the CSVG token presale disrupted at the point of imminent launch as described above.
13. The restrictions on Petitioner's Coinbase account have directly impaired marketplace listings, disrupted investor relationships, and prevented Petitioner from completing business transactions dependent on access to the restricted assets. RRP OG LLC and the affiliated nonprofit depend in

part on the NFT and CSVG ecosystem for operational funding — the lockout severed that pipeline entirely at the moment of its greatest potential.

14. The disruption extends beyond the Coinbase-specific assets. Petitioner had developed plans to launch additional token projects modeled on the CSVG framework — including ventures tied to existing Petitioner-owned brands and platforms — leveraging the smart contracts, tokenomics infrastructure, and distribution model already built and ready for replication. Those plans are dependent in part on the outcome of this case, as Petitioner's primary NFT account — through which all collections across multiple brands and ventures are connected — remains inaccessible due to the Coinbase lockout. Until access is restored, Petitioner cannot mint new collections, expand existing ones, or fully execute the next phase of planned ventures. The connection of all collections to a single account under Petitioner's name is not incidental — it reflects a deliberate choice to present an integrated body of work under Petitioner's own identity as an independent artist and entrepreneur, a choice that cannot be replicated on a substitute account without permanently fragmenting that identity and the provenance of the work.

15. This litigation has consumed hundreds to thousands of hours of Petitioner's time that would otherwise have been directed toward revenue-generating business activity. Petitioner had planned to launch another new media production venture and file a comprehensive federal civil RICO claim before the end of 2024. Both have been delayed into 2025 and beyond as a direct result of the time demands imposed by this case and the ongoing coordinated interference described herein.

16. The business harm is compounded by reputational damage. Petitioner operates in industries — media, technology, digital art, and Web3 — where credibility and perceived momentum are

essential to attracting clients, collaborators, and investors. The public nature of this litigation, combined with the coordinated pattern of interference Petitioner has experienced across social media platforms and professional channels, has directly impaired Petitioner's ability to secure business relationships. Clients and collaborators in these industries will not engage with someone who is visibly being targeted and sabotaged, as the risk of collateral interference is itself a deterrent.

17. Each disruption compounds the last. The time diverted to this litigation is time taken from the production venture, the next RICO filing, the token launches, the client work, and the decades of business infrastructure Petitioner has built. The harm is not static — it grows with every month the arbitration order remains in effect and every hour Petitioner is forced to spend in a legal proceeding that should never have been compelled.

VI. LAPTOP DAMAGE AND REPAIR DELAY

18. Petitioner's personal laptop — the primary instrument for legal preparation and business management — was damaged (suspect abuse of power hacked) and held for repair for a disruptive and seemingly intentional extended period.

19. This period of impairment coincided with the filing of Real Party in Interest's petition to compel arbitration and substantially impaired Petitioner's ability to prepare and file opposition papers.

VII. HEALTHCARE DISRUPTION

20. Throughout the pendency of this matter and for an extended period prior, Petitioner has

experienced systematic and ongoing disruption to access to healthcare. Petitioner has three documented physical disabilities, each of which independently supports a Social Security disability claim that Petitioner believes has been criminally obstructed. This disruption includes surveillance and intentionally agitating camera stalking at and around medical offices and waiting rooms, deliberate attempts to provoke altercations and disrupt appointments, and cancellation and rescheduling of appointments through interference. These acts have caused Petitioner to suffer unnecessarily and have interfered with Petitioner's ability to receive proper or consistent medical treatment for serious and documented conditions.

21. One of Petitioner's documented physical disabilities directly conflicts with how Coinbase's new mandatory biometric verification process purports to assess. Aside from an old, small Real ID picture that is partially covered by a hologram, Coinbase possessed no baseline images of Petitioner, nor should any such images exist or be required. The imposition of biometric verification under these circumstances created a discriminatory barrier to account access that implicates the Americans with Disabilities Act and rendered the verification requirement both inapplicable and impossible to fairly complete on its own terms.

VIII. STALKING, SURVEILLANCE, AND COORDINATED HARASSMENT

22. Petitioner has been subjected to a sustained and coordinated pattern of stalking and harassment that has continued throughout this litigation and for years prior. This pattern is consistent with and documented in a related federal proceeding.

23. The harassment includes pervasive surveillance at every location Petitioner frequents for basic daily needs — including medical offices, restaurants, grocery stores, on public transportation, in and around public libraries, and public parks. Coordinated efforts have resulted in Petitioner

being unfairly banned from three separate gym facilities where Petitioner relied on access for basic hygiene, forcing reliance on limited public alternatives. This conduct is designed to push Petitioner out of the areas of Los Angeles where Petitioner has lived his entire life and been building business ventures for three decades.

24. A documented pattern of license plate hacks has accompanied this stalking, including a significant influx of plates bearing the codes 187 and 422 that began and intensified following the filing of this lawsuit. The number 187 refers to California Penal Code section 187, the murder statute. The number 422 refers to California Penal Code section 422, criminal threats. These are not coincidences — they are communications. On multiple occasions vehicles bearing 187 plates have made movements consistent with attempted vehicular assault. Vehicles bearing 422 plates have appeared in contexts designed to lure Petitioner into situations that could be falsely characterized as criminal threats. One of Petitioner's previous civil lawsuit attempts was obstructed by a false arrest death trap following this pattern, which also forced him out of his home in the Hollywood Hills and effectively derailed his life.

25. The same pattern of coordinated name and alias hacks that Petitioner has documented extensively in the related federal proceeding has appeared in this litigation. These hacks involve the deliberate use of names — assigned to opposing counsel, Coinbase support staff, and individuals encountered in daily life — that contain embedded coded meaning when parsed, broken down, or read phonetically. The technique is designed to be plausibly deniable to outside observers while remaining unmistakable to the target: a name that appears ordinary on its face but communicates a specific threat, insult, or message when its components are analyzed. This pattern has been documented with screenshots and evidence in the related federal proceeding and its appearance in this litigation is consistent with the broader coordinated interference

Petitioner has experienced across multiple venues and over multiple years.

26. Petitioner has been falsely arrested on multiple occasions since first filing federal civil RICO claims in 2014, in a pattern Petitioner believes is directly connected to the litigation and the interests it threatens. Each false arrest has been accompanied by additional obstruction — including corrupt or compromised court proceedings, suppression of exculpatory evidence, and interference with Petitioner's ability to mount a defense — consistent with a coordinated effort to derail Petitioner's legal pursuits through the criminal justice system rather than on the merits.

IX. LAW ENFORCEMENT OBSTRUCTION

27. Petitioner has reported the conduct described herein to law enforcement on numerous occasions across multiple jurisdictions, including the Los Angeles Police Department, the Beverly Hills Police Department, and the Federal Bureau of Investigation. Every agency contacted has failed to take meaningful action. Petitioner filed a formal Motion for Referral to Law Enforcement in the trial court proceedings below, seeking assignment of investigators to the documented pattern of fraud, stalking, threats, and coordinated obstruction. That motion, supported by declaration and exhibits, is part of the record in this matter. (Ex. F4.)

28. As one illustration of the nature of this obstruction: when Petitioner reported an individual who had stalked Petitioner while carrying a hunting knife and made explicit threats — including a threat to castrate Petitioner and a subsequent threat to retrieve a firearm and kill Petitioner — law enforcement determined that no actionable threat had been made. That determination was false and the failure to act placed Petitioner in continuing danger.

29. Federal law enforcement has similarly neglected Petitioner's reports and complaints despite the federal nature of the conduct alleged.

30. The failure of law enforcement at every level to respond to documented, reported crimes not limited to threats is itself part of the pattern of coordinated interference this petition seeks to address, and it is one of the reasons this Court's intervention is among the last meaningful remedies available to Petitioner.

X. SOCIAL SECURITY AND ADMINISTRATIVE OBSTRUCTION

31. The coordinated interference described herein has extended to obstruction of Petitioner's Social Security disability application and appeals process. Petitioner has three documented physical disabilities each of which independently supports qualification for disability benefits.

32. During an administrative hearing, the presiding officer omitted material oral argument and documented records presented by Petitioner from the written decision. The decision as issued did not reflect the evidentiary record actually before the hearing officer.

33. Petitioner elected not to pursue the district court appeal of that decision in favor of filing a more comprehensive federal RICO claim that encompasses these violations and the broader pattern of institutional obstruction of which the disability proceeding was one part.

XI. CONTINUING RISK OF HARM AND IMPACT OF ARBITRATION ORDER

34. Restrictions on account access create ongoing uncertainty regarding Petitioner's ability to control, transfer, or otherwise protect digital assets associated with the Web3 Wallet.

35. The inability to access or manage these assets prevents Petitioner from taking steps that might otherwise be available to safeguard or preserve them.

36. Delays caused by arbitration proceedings or prolonged litigation could therefore result in

continued risk of loss or impairment of assets that are inherently unique.

37. The Superior Court's order compelling arbitration stayed the civil action and halted the litigation process in which Petitioner sought judicial relief concerning access to these assets.

38. As a result, the dispute regarding Petitioner's account access and related property rights remains unresolved while the order compelling arbitration remains in effect.

39. Because the assets involved include unique digital property and the restrictions on access continue, Petitioner believes that immediate judicial review is necessary to prevent ongoing and potentially irreparable harm.

40. The harm Petitioner faces is not limited to financial and property loss. The coordinated pattern of interference documented herein — including stalking, vehicular assault attempts, explicit death threats, and a history of false arrests timed to litigation events — creates ongoing risk of physical harm, false arrest, entrapment, and death that continues unabated while this matter remains in an arbitral limbo that forecloses the judicial discovery necessary to identify and hold accountable those responsible. The arbitration order does not merely delay resolution of a contract dispute — it actively perpetuates conditions under which Petitioner's physical safety, liberty, and life remain at risk.

XII. PURPOSE OF DECLARATION

41. This declaration is submitted to assist the Court of Appeal in understanding the continuing nature of the harm associated with the account restrictions, the coordinated pattern of interference Petitioner has experienced throughout this litigation, and the potential impact of delays caused by arbitration proceedings.

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

Respectfully submitted,

Dated: March 10, 2026

/s/ Russell Rope

Petitioner In Pro Per

justice@russellrope.com