

1           **RUSSELL ROPE**  
2           ID 1607 POB 1198  
3           Sacramento, CA 95812  
4           310-663-7655  
5           [justice@russellrope.com](mailto:justice@russellrope.com)  
6           *In Pro Per*  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

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

} 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**  
}

**NOTICE**

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

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

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

- More than 10-year pattern of fraud and malice
- biometric lockout misconduct

1           • newly compiled evidence from federal RICO claim

2           • evidence connecting Coinbase's vendors/partners to prior criminal patterns

3           • additional technical materials disproving Coinbase's "impossibility" claims

4           • supplementary evidence showing lack of assent to arbitration

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

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10           if reconsideration is denied.

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

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17           **MEMORANDUM OF POINTS & AUTHORITIES**

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

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

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

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25           **II. Newly Discovered Evidence Necessitates Reconsideration**

26           Plaintiff will present:

27           • RICO complaint & sometime like 100 new exhibits

1           • evidence of ongoing concerted fraud

2           • technical evidence disproving Coinbase's assertions

3           • new records of biometric system misconduct

4           • newly explained communications and patterns

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

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

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17 **III. A Writ of Mandate Will Be Sought if Necessary**

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19 Arbitration orders are reviewable only via writ.

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24 **DECLARATION OF RUSSELL ROPE**

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26       1. I am the Plaintiff.

27       2. I intend to file a Motion for Reconsideration under CCP § 1008(b).

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1 3. I have identified new evidence tying this case to a larger pattern of fraud and misconduct, as  
2 well as new information concerning the discriminatory effect of the biometric lockout.  
3  
4 4. I require the Statement of Decision to identify omissions and legal error.  
5  
6 5. If reconsideration is denied, I intend to seek writ review.

7 I declare this under penalty of perjury.  
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9 Submitted on December 4, 2025  
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11 /s/ Russell Rope  
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14 *Plaintiff In Pro Per*  
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16 **[PROPOSED] ORDER**  
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18 **RE: NOTICE OF INTENT TO SEEK RECONSIDERATION / WRIT RELIEF**  
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20 The Court acknowledges Plaintiff's Notice of Intent.  
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22 No further order is required.  
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24 IT IS SO ORDERED.  
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26 Date: \_\_\_\_\_  
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28 Hon. Rupert A. Byrdsong  
Judge of the Superior Court

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## PROOF OF SERVICE

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

ID 1607 POB 1198, Sacramento, CA 95812.

On the date below, I served the following:

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

on all counsel of record via electronic service to:

- [jpétrick@nortonlaw.com](mailto:jpétrick@nortonlaw.com)
- [cpurcell@nortonlaw.com](mailto:cpurcell@nortonlaw.com)
- [ekirk@nortonlaw.com](mailto:ekirk@nortonlaw.com)

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

Submitted on December 4, 2025

/s/ Russell Rope

*Plaintiff In Pro Per*