

**Russell Rope**  
*Petitioner In Pro Per*  
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(310) 663-7655

**IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA**

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**RUSSELL ROPE,**  
Petitioner,

vs.

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF LOS ANGELES, &  
THE HONORABLE STEPHEN I. GOORVITCH,**  
Respondents,  
**COINBASE, INC.,**  
Real Party in Interest.

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*Case No. S291823  
Related Appeals Court Case No. B347393  
Related Superior Court Case No. 25STCV16692*

**REQUEST FOR JUDICIAL NOTICE AND  
SUPPLEMENTAL CONSIDERATION  
FOR EMERGENCY PETITION FOR REVIEW AND REQUEST FOR STAY**

*(Cal. Rules of Court, Rule 8.500(g); Court's Inherent Authority)*

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**In Support of Emergency Petition for Review**

Petitioner **Russell Rope**, in pro per, respectfully requests that the Court take judicial notice of and consider the following previously prepared documents as supplemental material in support of the **Emergency Petition for Review** filed on July 9, 2025, in Case No. S291823:

1. **Emergency Declaration and Request for Protective Relief**, filed July 7, 2025
2. **Clarification and Supplemental Declaration of Russell Rope**, filed July 7, 2025

These documents were originally submitted in connection with earlier filings before the Court of Appeal and this Court, but they were not included in the 10-page petition now under consideration due to page limitations.

Petitioner respectfully requests that the Court consider these documents as filed and without further modification or updates, as they contain material facts, clarifications, and supporting information that are directly relevant to the relief sought in the Petition for Review. In particular:

1. **The Emergency Declaration and Request for Protective Relief** outlines the immediate and urgent need for action to protect Petitioner's safety and digital property. This request is time-sensitive and critical to the resolution of the petition.
2. **The Clarification and Supplemental Declaration** provides additional technical details regarding Petitioner's qualifications and the mechanisms of asset recovery, including internal exhibits (A and B). These details are necessary to ensure the Court has all relevant background and supporting information, but Petitioner emphasizes that the **primary request for protective relief** remains the most urgent issue for consideration.

The attached documents are accurate, served on Respondents and Real Parties in Interest, and reflect the factual and legal grounds for the relief requested.

Dated: July 9<sup>th</sup>, 2025  
/s/ **Russell Rope**  
*Petitioner In Pro Per*

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# **EXHIBIT A**

## **Emergency Declaration & Request for Protective Relief**

Filed July 3, 2025

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**Russell Rope**

*Petitioner In Pro Per*

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**(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, &  
THE HONORABLE STEPHEN I. GOORVITCH,**  
Respondents,

**COINBASE, INC.,**  
Real Party in Interest.

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**Case No. B347068**

*Supreme Court Case No. S291749*

*Superior Court Case No. 25STCV16692*

**EMERGENCY DECLARATION &  
REQUEST FOR PROTECTIVE RELIEF**  
**In Support of Emergency Verified Petition**

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**DECLARATION OF RUSSELL ROPE**

I, Russell Rope, declare under penalty of perjury under the laws of the State of California as follows:

1. I am the Petitioner in this matter and the Plaintiff in the underlying case (Los Angeles Superior Court Case No. 25STCV16692), currently pending against Coinbase, Inc. and related defendants.

2. I am writing to urgently request court intervention and protection due to escalating threats, physical assaults, stalking, and life-endangering harassment directly linked to this litigation and its underlying claims.
3. On July 3, 2025, I was physically assaulted—punched in the back of the head by an unknown stalker—upon exiting the subway en route to the library in Hollywood. I immediately reported the incident to the LAPD, who filed a police report but stated they would not follow up. I have reason to believe this was not an isolated incident, but part of a coordinated effort to harm or intimidate me based on my legal actions.
4. Earlier the same day, while en route to the courthouse for a hearing, I was nearly cornered on a train platform by what appeared to be a group intending to ambush or attack me. I evaded the threat by leaving the area.
5. These incidents follow a pattern of daily coordinated stalking and intimidation. I have been repeatedly harassed at parks where I exercise early in the morning. One incident involved a man approaching with a large hunting knife, followed by verbal threats to castrate me. Police were called, but no arrest was made.
6. In addition to physical violence, I have been targeted by online and digital threats, including:
  - Repeated digital stalking of my screen activity and development environments.
  - Attempts to interfere with and steal my intellectual property and brand assets.
  - 187-themed license plate harassment (death threats).
  - Social media and web-based impersonation attempts tied to my business identity.
7. I have also received indirect threats suggesting gun violence. These include coded speech, posts, and local word-of-mouth targeting me in my known areas of residence and activity. I take these

threats seriously.

8. This campaign of stalking and intimidation began prior to the filing of this lawsuit, has escalated since initiating proceedings against Coinbase, and now appears to be coordinated with digital interference and legal obstruction. I believe this conduct warrants investigation under criminal statutes as well as urgent protective orders.

**9. I request that the Court:**

- Refer these matters for law enforcement investigation and prosecution.
- Issue or recommend protective relief, including a restraining or stay-away order.
- Assist in securing safe, confidential housing if needed to preserve my safety and ongoing access to court processes.

10. I can provide supporting documentation, video evidence, and sworn declarations to substantiate the above incidents. However, I have been working under extraordinary time pressure preparing multiple simultaneous court filings and am requesting this Court's assistance to preserve my life and legal rights without delay.

**Dated:** July 3<sup>rd</sup>, 2025  
**/s/ Russell Rope**  
*Petitioner In Pro Per*  
*justice@russellrope.com*

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# **EXHIBIT B**

## **Clarification & Supplemental Declaration of Russell Rope**

Filed July 7, 2025

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**IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA**

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**RUSSELL ROPE,**  
Petitioner,

vs.

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF LOS ANGELES, &  
THE HONORABLE STEPHEN I. GOORVITCH,**  
Respondents,

**COINBASE, INC.,**  
Real Party in Interest.

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**Case No. S291749**  
*Related Appeals Court Case No. B347393*  
*Related Superior Court Case No. 25STCV16692*

**CLARIFICATION AND SUPPLEMENTAL DECLARATION  
OF RUSSELL ROPE REGARDING DOCKET  
ENTRY IN CASE NO. S291749**

**IN SUPPORT OF EMERGENCY PETITION FOR REVIEW AND RENEWED  
WRIT OF MANDATE / PROHIBITION, OR OTHER APPROPRIATE RELIEF**

(Cal. Const., art. VI, §10; CCP §§1085, 1102; Cal. Rules of Court, Rule 8.500(f); Rule 8.486)



I, Russell Rope, declare:

1. I am the Petitioner in this matter and submit this declaration to respectfully clarify the procedural record concerning the above-captioned case, and to supplement my previously filed **Emergency Petition for Review and Request for Emergency Stay**, which remains pending before this Court.

2. On **June 25, 2025**, the Second District Court of Appeal denied my original writ petition (Case No. B347393), which sought emergency relief concerning a trial court preservation order and Coinbase's refusal to return or facilitate access to my digital assets.

3. Following that denial, and based on new facts—including a partial grant of relief by the trial court on **June 27, 2025**, and Coinbase's subsequent move to dissolve that order—I filed a revised emergency petition directly in the California Supreme Court. That filing was made under Case No. **S291749**.

4. On **July 3, 2025**, the Court of Appeal **again denied relief**, either by summarily denying a second filing or by denying the relief contemplated under the Supreme Court's earlier transfer. In direct response to that denial, I filed the current version of my petition with the California Supreme Court **later that same day**—not as a duplicate of the prior petition, but as a renewed request based on additional evidence and the new denial from the Court of Appeal.

5. The Supreme Court docket reflects only two entries for July 3:

- (1) "Petition for writ of mandate/prohibition with request for stay filed"
- (2) "Transferred to CA2... in light of Hagan v. Superior Court..."

6. Based on the docket entry and lack of further correspondence, it appears the Court may have mistakenly **interpreted my July 3 filing as a duplicate of the earlier petition that was already transferred**, rather than as a **distinct petition filed after the Court of Appeal issued a second denial** that same day.

7. To be clear, the July 3 petition now before this Court was **not the same** as the one previously transferred. It was filed only **after the Court of Appeal refused to intervene again**, and it presents **new facts, new trial court rulings, and new evidence of irreparable harm** that did not exist at the time of the June 25 denial.

8. Most critically, on **July 7, 2025**, the trial court:

- **Dissolved the June 27 preservation order**, removing the only existing protection for my digital property;
- **Denied a revised ex parte application** seeking limited enforcement relief;
- Made the statement that **“this is now a damages case,”** despite new declarations showing technical feasibility and Coinbase’s refusal to cooperate;
- Appeared to rule on the merits of my filing even though the clerk had rejected the documents as untimely, creating procedural confusion.

9. Coinbase has declared that access to the Web3 Wallet infrastructure will terminate by **July 18, 2025**.

Without emergency action from this Court, I face permanent loss of unique digital assets tied to identity, revenue, and safety.

10. I respectfully request that this Court **correct or clarify the docket entry**, reinstate its jurisdiction over Case No. S291749, and review the emergency petition filed in response to the **July 3 Court of Appeal denial**, not the June 25 petition previously transferred.

11. I am concurrently lodging as **Exhibit A** a true and correct copy of the full Ex Parte Application for Equivalent Relief in Lieu of TRO, filed on July 6, 2025, including the supporting declaration I submitted in conjunction with it. This filing clarified the distinction between preservation and the specific return of my assets, rebutted Coinbase's engineering-based objections, and presented a feasible and narrowly tailored request for enforcement. I am also attaching as **Exhibit B** a true and correct copy of the clerk's rejection notice, issued at 7:39 AM on July 7, 2025, which stated that the ex parte filing was rejected for being submitted after the prior court day's 10:00 AM deadline. Despite that rejection, the trial court proceeded to hear and deny the application on the record, creating a direct procedural conflict.

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

Dated: July 7, 2025 /  
s/ **Russell Rope**  
*Petitioner In Pro Per*

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# **EXHIBIT A**

## **Ex Parte Application for Equivalent Relief in Lieu of TRO & Supplemental Declaration of RR in Opposition to Coinbase**

Filed July 6, 2025

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*In Pro Per*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

RUSSELL ROPE,  Plaintiff,  v. COINBASE, INC. & DOES 1-20,  Defendants	}	Case No.: <u>25STCV16692</u>
	}	<b>EX PARTE APPLICATION FOR</b>
	}	<b>EQUIVALENT RELIEF IN LIEU OF TRO</b>
	}	<b>OR EMERGENCY PRESERVATION</b>
	}	<b>ORDER; MEMORANDUM OF POINTS &amp;</b>
	}	<b>AUTHORITIES; DECLARATION OF</b>
	}	<b>RUSSELL ROPE IN SUPPORT</b>
	}	
	}	<u>Hearing Date: July 7, 2025; 8:30 AM Dept: 85</u>
	}	<u>Judge: Hon. James C. Chalfant</u>

**TO THE HONORABLE COURT**

**AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff Russell Rope will and hereby does apply ex parte on July 7, 2025, at 8:30 a.m., or as soon thereafter as the matter may be heard, in Department 85 of the above-entitled Court located at 111 N. Hill Street, Los Angeles, CA 90012, for an order granting emergency equitable relief functionally equivalent to the relief sought in the Proposed TRO filed June 19, 2025, and partially granted on June 27, 2025.

1 **I. RELIEF REQUESTED**

2 Plaintiff respectfully requests that the Court:

3  
4 **a)** Enforce the June 27, 2025 Minute Order to compel Defendant Coinbase, Inc. to preserve all digital  
5 assets, metadata, and access credentials associated with Plaintiff's Web3 Wallet and NFTs;  
6

7  
8 **b)** Order Coinbase, Inc. to immediately transfer all assets (including ~4,000 NFTs) from Plaintiff's  
9 Coinbase-controlled custodial wallet to Plaintiff's designated cold wallet address;

10 **0xe56f69BE1F7b5F3f807F0f3a5f89AD79d2bdacff** <---- (*verified wallet*)  
11

12  
13 **c)** Order Coinbase to assist with passkey recovery or bypass where necessary, using available  
14 administrative access and account verification, as detailed in Plaintiff's concurrently filed supplemental  
15 declaration;  
16

17  
18 **d)** Clarify that any perceived burden claimed by Coinbase is not grounds to delay or avoid compliance,  
19 particularly as the burden—if any—arises from Coinbase's own misconduct in unlawfully withholding  
20 Plaintiff's assets despite repeated good-faith requests and proper legal notice;  
21

22 **e)** Sanction Coinbase and/or issue an OSC re: sanctions for bad faith litigation conduct, including  
23 misleading the Court about technical impossibility, failing to meet and confer in good faith, and  
24 misrepresenting the scope of the June 27, 2025 order.  
25  
26  
27  
28

## II. MEMORANDUM OF POINTS AND AUTHORITIES

Emergency equitable relief is warranted where a party faces irreparable harm, is likely to succeed on the merits, and where the balance of equities favors intervention. (See *Robbins v. Superior Court* (1985) 38 Cal.3d 199; Civ. Code § 3422; CCP § 526.)

Plaintiff's Verified Complaint alleges claims including conversion, fraud, and biometric coercion, supported by over 4,000 unlawfully held NFTs valued at over \$1 million. Coinbase has not disputed that the assets exist or that they control the wallet. The Court has already issued a preservation order. However, Coinbase continues to block access, ignore the preservation directive, and evade meaningful cooperation.

The Court expressed concern on July 3, 2025, about factual distinctions in Plaintiff's prior filings and asked for clarification and new facts. Plaintiff's concurrently filed supplemental declaration provides those details, including clear technical explanations of why Coinbase's claimed engineering burden is fabricated and how they routinely execute such transfers under probate and regulatory procedures.

Crucially, Plaintiff emphasizes that return of assets takes precedence over mere preservation, and has made numerous good-faith requests for transfer. Coinbase has instead tried to redirect the Court's attention away from the core harm and mischaracterize Plaintiff's relief as premature or burdensome—despite being able to manually comply with the Court's June 27 Order through root administrative actions.

1 Plaintiff respectfully requests that the Court restore meaningful relief by compelling Coinbase to fulfill  
2 its custodial obligations, comply with legal process, and return Plaintiff's property without further delay.  
3

### 4 **III. DECLARATION OF RUSSELL ROPE**

5 I, Russell Rope, declare as follows:  
6

- 7  
8 • I am the Plaintiff in this matter. I have personally experienced the denial of access to my Web3  
9 Wallet since April 19, 2025, despite verifying my identity and making repeated good-faith  
10 requests for support.  
11
- 12  
13 • The Court issued a preservation order on June 27, 2025. Coinbase did not object at the time.  
14 Instead, they later filed a bad-faith ex parte application attempting to dissolve that order without  
15 complying or providing technical basis for their opposition.  
16
- 17  
18 • I have submitted a detailed supplemental declaration filed concurrently with this application that  
19 addresses the technical feasibility of asset transfer and account recovery, based on both my  
20 technical qualifications and publicly available information about Coinbase's custodial practices.  
21
- 22  
23 • I am requesting immediate manual transfer of my assets using Coinbase's administrative  
24 capabilities, and that those assets be preserved and not altered or deleted until full transfer is  
25 complete and confirmed.  
26  
27  
28



- 1 • Coinbase’s refusal has resulted in escalating and irreparable harm to my business ventures, brand  
2 equity, and digital asset value, as further detailed in my declaration.  
3

4 **IV. CONCLUSION**  
5

6 For the foregoing reasons, Plaintiff respectfully requests that the Court grant this revised ex parte  
7 application based on new facts and enforce the June 27, 2025 order through affirmative relief.  
8

9 Dated: July 6<sup>th</sup>, 2025

10 /s/ Russell Rope  
11 *Plaintiff In Pro Per*  
12

13 **PROOF OF SERVICE**  
14 **Case No.: 25STCV16692**  
15

16 I, Russell Rope, declare that on July 6, 2025, at 5:30 p.m. PDT, I served the foregoing **EX PARTE**

17 **APPLICATION FOR EQUIVALENT RELIEF IN LIEU OF TRO OR EMERGENCY**

18 **PRESERVATION ORDER; MEMORANDUM OF POINTS & AUTHORITIES;**

19 **DECLARATION OF RUSSELL ROPE IN SUPPORT** on Coinbase, Inc.’s counsel  
20

21 (jackie.feick@nortonrosefulbright.com, eric.martin@nortonrosefulbright.com,  
22 jeff.margulies@nortonrosefulbright.com) via email, pursuant to Cal. Code Civ. Proc. §1010.6 and Cal.

23 Rules of Court, Rule 2.251. I declare under penalty of perjury under the laws of California that the  
24 foregoing is true and correct.  
25

26 Dated: July 6<sup>th</sup>, 2025

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

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*In Pro Per*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

RUSSELL ROPE,

Plaintiff,

v.

COINBASE, INC. & DOES 1-20,

Defendants

Case No.: 25STCV16692

**SUPPLEMENTAL DECLARATION OF  
RUSSELL ROPE IN OPPOSITION TO  
COINBASE'S MOTION FOR TEMPORARY  
RESTRAINING ORDER BASED ON  
ENGINEERING BURDEN**

Hearing Date: July 7, 2025; 8:30 AM Dept: 85

Judge: Hon. James C. Chalfant

**I. INTRODUCTION**

I submit this supplemental declaration to oppose Defendant Coinbase's application for a Temporary Restraining Order (TRO) alleging undue engineering burden. Specifically, Coinbase asserts that it cannot technically comply with the Court's June 27, 2025 order or the related request for manual transfer of approximately 4,000 NFTs and related account data from my custodial wallet, and now seeks to dissolve the order, citing alleged engineering burdens that contradict their own documented administrative capabilities and regulatory obligations.

## **CLARIFICATION OF EX PARTE RELIEF SOUGHT**

Plaintiff respectfully clarifies that the primary relief sought has always been the immediate return of assets—not merely their preservation. The preservation request was made solely to prevent further harm to Plaintiff's assets while Coinbase fulfilled its obligations to transfer control. Plaintiff has made multiple clear and timely requests for asset transfer, which Coinbase has failed to honor. Rather than comply or engage in a good faith meet-and-confer, Coinbase has attempted to misdirect the Court by reframing the relief sought as burdensome preservation rather than routine custodial asset transfer.

Notably, Coinbase failed to comply with the Court's June 27, 2025, meet-and-confer directive. They falsely claimed lack of notice at the initial hearing—despite having received timely and documented email service—and have continued to misrepresent facts and procedures. Their bad-faith litigation strategy includes obstruction, delay, and material misstatements made directly to the Court. In contrast, Plaintiff has acted with transparency and integrity throughout this process and continues to seek a fair, lawful remedy grounded in truth and equity.

## **II. PLAINTIFF'S TECHNICAL QUALIFICATIONS**

In addition to being a digital artist and an entrepreneur, I am an engineer and multidisciplinary developer with over three decades of experience in the administration of web and software development, digital infrastructure, and interactive media. I own and operate a California LLC, which is an umbrella for my various productions and ventures, a California general corporation, and a multistate nonprofit corporation. I operate multiple daily digital publications and have a show in production, which keeps getting disrupted by prioritized defense of my life and intellectual property.

**My qualifications include:**

- An individually structured 5-year degree in Technology, Art, and Media
- Professional certification in Multidisciplinary Applied Technologies
- 30 years of constant self-education and demonstrable evolution in relevant fields
- 30 years of entrepreneurship since launching first "design and development" business
- Working proficiency in ~40 programming languages
- Extensive experience building and managing database driven platforms, fully monetized with e-commerce integration for merchandising, mixed media marketing, and the most recent addition of full stack Web3 development including relevant technologies.
- 4 years of advanced digital electronics studies, split between high school and college, including binary digital logic, telecommunications, and robotics

As creator of not limited to the token, smart contracts, and dapps for the Classy Savage (CSVG) ecosystem and related NFT collections, I am fully capable of interfacing with any qualified developer or technical liaison from Coinbase to coordinate recovery. While I do respect that elite root level administrative developers at Coinbase have significantly more knowledge regarding the workings of their own platform and the things they specialize in, the most logical fundamentals of computer science remain constant.

### III. COINBASE'S CUSTODIAL AUTHORITY & DEMONSTRATED CAPABILITIES

Coinbase is the custodian of my Web3 Wallet and has admitted (in meet-and-confer and via counsel) that it retains control over custodial wallet infrastructure. As a major custodial service provider, Coinbase has demonstrated administrative capabilities through documented practices including:

**a) Deceased User Account Management:** Coinbase's own policies provide for "Manual Transfer" options to "manually transfer the account or asset" for deceased users, demonstrating clear administrative capability to move custodial assets.

**b) Regulatory Compliance:** Coinbase's User Agreement explicitly states they "may cancel or refuse to process any pending Outbound Digital Asset Transfers as required by law or any court or other authority," indicating they possess systems to control asset movement when legally required.

**c) Court Order Compliance:** Coinbase has complied with Norwich Pharmacal Orders and other court directives requiring asset disclosure and management, indicating existing procedures for judicial intervention in custodial accounts. Federal enforcement actions have previously required Coinbase to demonstrate technical capability to comply with subpoenas requiring administrative access to custodial account information.

For custodial wallets like mine, Coinbase maintains control over private keys and can execute administrative functions including asset transfers without requiring user authentication, as evidenced by their established procedures for estate transfers and regulatory compliance.

#### IV. CUSTODIAL WALLET RECOVERY IS STANDARD PRACTICE

My wallet is a custodial wallet, meaning Coinbase controls the private keys and has full administrative access to the assets. This is fundamentally different from non-custodial wallets where users control their own private keys.

For custodial wallets, standard industry practice includes:

- Administrative override capabilities for account recovery
- Asset transfer functions for legal compliance
- Account restoration procedures for verified users

Coinbase's documented procedures for deceased user accounts prove they have the technical infrastructure to transfer custodial assets administratively. The same technical capabilities that allow estate transfers can be applied to court-ordered asset recovery.

#### V. EVIDENCE OF ROUTINE ADMINISTRATIVE ASSET MANAGEMENT

Coinbase routinely manages custodial assets through administrative functions:

**a) Estate Processing:** Coinbase's documented procedures allow estates to "submit letters testamentary and death certificate to Coinbase, and they will grant access," demonstrating administrative override capabilities. Court precedents have established that such probate transfers of digital assets from custodial wallets are both legally recognized and technically feasible.

1 **b) Sanctions Compliance:** Coinbase operates "proprietary software specifically helps with sanctions  
2 compliance by allowing us to interdict (freeze) assets," showing they have systems to control custodial  
3 asset movement.

4  
5 **c) Account Recovery:** Coinbase maintains account recovery procedures for verified users who have lost  
6 access, though they may require extensive verification processes.  
7

8  
9 These documented practices demonstrate that Coinbase possesses the technical capability to transfer  
10 custodial assets administratively when legally required.  
11

## 12 13 **VI. INTEGRATION WITH NFT MARKETPLACES**

14  
15 Coinbase Wallet integrates with major NFT marketplaces including OpenSea, Rarible, and Magic Eden.

16 For custodial wallets, this integration allows for:

- 17
- 18 • Marketplace authentication using custodial account credentials
  - 19 • NFT transfer and management functions
  - 20 • Collection and metadata management
- 21

22 These integrations are standard features that require no additional engineering development.  
23

## 24 25 **VII. MY BUSINESS INTERESTS & ONGOING HARM**

26 In addition to CSVG, I operate an LLC, a general California corporation, a multistate nonprofit, several  
27 productions with development initiatives, and multiple brands with daily digital publications  
28

1 Delays caused by Coinbase's refusal to restore access have blocked projects, contracts, and distribution  
2 pipelines. My other businesses have been attacked separately, but following similar and identifiable  
3 patterns of misconduct. The deadline they imposed directly follows an attempted extortion where my  
4 previous private web host of decades was either bribed or coerced to take all of my sites offline and hold  
5 them ransom demanding a relatively insane amount of money, which forced me to move everything to a  
6 new server and cost me a tremendous amount of time. They forced premature legal action with no  
7 alternative to recovering my assets and knowing it would drain my limited time. I can demonstrate  
8 billions of dollars in damages to my other pioneering ventures in federal RICO claim that is and was  
9 planned to resume after the delayed NFT drop and coin launch. This "Classy Savage" branded venture  
10 was supposed to be a quick fix for my bank account, and it did initially pay off all my debts in full;  
11 problems caused by the other defendants. My credit score, which they annihilated is now an exceptional  
12 804 (FICO score). Engineering burden is not the problem—obstruction is.  
13  
14

15  
16 I believe I am currently experiencing the same cycle described in Leone, et al. v. Coinbase, Inc. (N.D.  
17 Cal. 2021), where plaintiffs alleged that Coinbase subjected users to a Kafkaesque verification loop—  
18 rejecting valid credentials, providing contradictory instructions, and forcing repeated submissions  
19 without resolution. As in Leone, my account access remains obstructed regardless of the documentation  
20 I provide or the security of the credentials I control. This lockout pattern undermines Coinbase's  
21 assertion that I am simply "refusing" recovery steps; rather, I am being forced into a designed loop that  
22 effectively prevents access.  
23  
24  
25  
26  
27  
28



## VIII. CONTINUING DAMAGES & ESCALATING HARM

In order to be taken seriously by the court, I provided a low-ball number for the valuation of my art. I have also put great effort into isolating claims and minimalist pleading. For the record, I have realistically and actively been working to acquire upwards of \$100 million in capital using my entire NFT collection as collateral with intent of providing a 10x return on investment equating to \$1 billion, which is the amount I plan to claim in damages if they fail to return my assets.

I respectfully warned Coinbase's attorneys that delay would increase damages, such as due to:

- Lost business opportunities and partnership deals
- Diminished brand value and market position
- Ongoing operational disruptions to my business ventures
- Missed launch windows and marketing opportunities

These figures are based on valuation of NFTs, brand equity, missed launches, marketing partnerships, my other interconnected business ventures, and diminished goodwill. I have made great sacrifices and taken calculated risks using every minute as efficiently as possible without a second to spare. Their disruptions, which follow patterns of conduct that I have experienced, documented, and reported over the past two decades are causing real damages, place my life under constant threats and in physical danger. I have medical issues that are not covered by health insurance with quotes for treatment rising as damages are exacerbated, Classy Savage is not the only source of income that has been targeted, and the more they get away with violating me and obstructing justice, the more they try to get away with.

1 Defendant attorneys mentioned their "millions of users" at the last hearing, who would not be affected  
2 by this, in some poor argument about delusional engineering burden. My media network averages  
3 50,000 unique visitors per month. During heavy marketing in the past, that number has topped a million.  
4 I only spend \$10-20.00 a month on web hosting. Even if their burden of expenses were as high as tens of  
5 thousands of dollars a week regarding their fabrications, they are potentially going to lose significantly  
6 more money to me, face reputational damages, proposed sanctions, could have avoided this entire mess  
7 by treating me with compassion, and they still have time to return my assets.  
8

#### 9 10 11 **IX. COINBASE'S BURDEN, IF ANY, IS SELF-INFLICTED**

12 To the extent that Coinbase now claims any technical or operational burden, such burden is the direct  
13 consequence of its own refusal to return Plaintiff's property despite multiple good-faith requests. Any  
14 inconvenience or cost associated with compliance should be treated not as a defense, but as a self-  
15 inflicted penalty for unlawfully retaining control over Plaintiff's assets in violation of established rights  
16 and after clear notice. Coinbase cannot first obstruct recovery and then seek judicial relief from the  
17 predictable consequences of its obstruction.  
18

#### 19 20 21 **X. CONCLUSION**

22 Coinbase's claim of undue engineering burden is contradicted by their own documented practices for  
23 custodial wallet management. Their system permits the manual transfer of custodial assets, account  
24 recovery, and marketplace integration with minimal administrative effort, as evidenced by their  
25 established procedures for deceased users, regulatory and court order compliance. I am the only party  
26 facing irreparable harm including the burden of having to compile these legal documents and appear in  
27 court, which are draining significantly limited resources. Their resources are comparatively unlimited.  
28

1 I request the Court deny Coinbase's motion, enforce the preservation order, and order immediate  
2 compliance with asset return and account control through their existing administrative capabilities.

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

7  
8 Dated: July 6<sup>th</sup>, 2025  
9 /s/ Russell Rope  
10 *Plaintiff In Pro Per*  
11

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12  
13 **PROOF OF SERVICE**  
14 **Case No.: 25STCV16692**

15  
16 I, Russell Rope, declare that on July 6, 2025, at 5:30 p.m. PDT, I served the foregoing

17 **SUPPLEMENTAL DECLARATION OF RUSSELL ROPE IN OPPOSITION TO COINBASE’S**  
18 **MOTION FOR TEMPORARY RESTRAINING ORDER BASED ON ENGINEERING BURDEN**  
19 on Coinbase, Inc.’s counsel (jackie.feick@nortonrosefulbright.com,  
20 eric.martin@nortonrosefulbright.com, jeff.margulies@nortonrosefulbright.com) via email, pursuant to  
21 Cal. Code Civ. Proc. §1010.6 and Cal. Rules of Court, Rule 2.251. I declare under penalty of perjury  
22 under the laws of California that the foregoing is true and correct.  
23

24  
25 Dated: July 6<sup>th</sup>, 2025  
26 /s/ Russell Rope  
27 *Plaintiff In Pro Per*  
28

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# **EXHIBIT B**

## **One Legal & Clerk's Rejection Email**

Received 7:39am, July 7, 2025

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## Exhibit B - One Legal & Clerk's Rejection Email

**Subject:** eFiling rejected for RUSSELL ROPE vs COINBASE, INC.

**From:** noreply@onelegal.com

**Date:** 7/7/2025, 7:39 AM

**To:** justice@russellrope.com

### eFiling Rejected by Court Clerk

**Order #** [25764062](#)  
**Submitted** 7/6/2025 5:31 PM PT by Russell Rope  
**Case** RUSSELL ROPE vs COINBASE, INC.  
#25STCV16692  
**Court** Superior Court of California, Los Angeles County  
(Central District)  
**Client billing** 25STCV16692  
**Court transaction #** 25LA01265349

#### Message from the court clerk

Per general order Ex Parte applications and all documents in support thereof must be electronically filed no later than 10:00 a.m. the court day before the Ex Parte hearing.

#### Rejected Documents

- Ex Parte Application (For Immediate Return of Asse...
- Declaration (of Russell Rope in Opposition to Coin...

#### What happens next?

Review the attached Rejection Notice from the court. You can re-file corrected documents by [placing a new order](#).

Thank you,  
The One Legal Team

You are receiving this email in response to an order that was placed on [www.onelegal.com](http://www.onelegal.com)  
Please do not reply to this email. Get help on our [Support Center](#) or by contacting [Customer Support](#).  
InfoTrack US, Inc. 1400 North McDowell Blvd., Suite 300, Petaluma, CA 94954



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

**IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA**

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**RUSSELL ROPE,**  
Petitioner,

vs.

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF LOS ANGELES, &  
THE HONORABLE STEPHEN I. GOORVITCH,**  
Respondents,

**COINBASE, INC.,**  
Real Party in Interest.

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**Case No. S291749**  
*Related Appeals Court Case No. B347393*  
*Related Superior Court Case No. 25STCV16692*

**PROOF OF SERVICE  
OF CLARIFICATION AND SUPPLEMENTAL DECLARATION  
OF RUSSELL ROPE REGARDING DOCKET ENTRY IN CASE NO. S291749**

**IN SUPPORT OF EMERGENCY PETITION FOR REVIEW AND RENEWED  
WRIT OF MANDATE / PROHIBITION, OR OTHER APPROPRIATE RELIEF**

*(Cal. Const., art. VI, §10; CCP §§1085, 1102; Cal. Rules of Court, Rule 8.500(f); Rule 8.486)*

I, Russell Rope, declare:

On **July 7, 2025**, I served a true and correct copy of the: **CLARIFICATION AND SUPPLEMENTAL DECLARATION OF RUSSELL ROPE REGARDING DOCKET ENTRY IN CASE NO. S291749** (Supreme Court of California) on the parties listed below by the following methods:

**1. By Electronic Filing:**

Filed electronically with the **Superior Court of California, County of Los Angeles**, Department 82 & 85, via e-filing provider One Legal.

**2. By Email:** Served via email to counsel for Coinbase, Inc.:

- Jackie Feick – [jackie.feick@nortonrosefulbright.com](mailto:jackie.feick@nortonrosefulbright.com)
- Eric Martin – [eric.martin@nortonrosefulbright.com](mailto:eric.martin@nortonrosefulbright.com)
- Jeffrey Margulies – [jeff.margulies@nortonrosefulbright.com](mailto:jeff.margulies@nortonrosefulbright.com)

**3. By Email to California Attorney General:**

Also served via general email contact form with file upload on CA AG website

@ <https://oag.ca.gov/contact/general-contact-form>

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

Dated: July 7<sup>th</sup>, 2025  
/s/ Russell Rope  
*Petitioner In Pro Per*

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

**IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA**

---

**RUSSELL ROPE,**  
Petitioner,

vs.

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF LOS ANGELES, &  
THE HONORABLE STEPHEN I. GOORVITCH,**  
Respondents,

**COINBASE, INC.,**  
Real Party in Interest.

---

**Case No. To Be Assigned**  
*Related Appeals Court Case No. B347393*  
*Related Superior Court Case No. 25STCV16692*

**PROOF OF SERVICE**  
**OF REQUEST FOR JUDICIAL NOTICE AND SUPPLEMENTAL CONSIDERATION**  
**FOR EMERGENCY PETITION FOR REVIEW AND REQUEST FOR STAY**  
*(Cal. Rules of Court, Rules 8.500, 8.500(g), & 8.116; Court's Inherent Authority)*

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I, Russell Rope, declare: On **July 8, 2025**, I served a true and correct copy of the: **REQUEST FOR JUDICIAL NOTICE AND SUPPLEMENTAL CONSIDERATION FOR EMERGENCY PETITION FOR REVIEW AND REQUEST FOR STAY** (Supreme Court of California) on the parties listed below by the following methods:

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**1. By Electronic Filing:**

Filed and electronically served with the **Superior Court of California, County of Los Angeles**, Department 82 & 85, via e-filing provider One Legal.

**2. By Electronic Filing**

Filed and electronically served the **California Court of Appeal, Second Appellate District**, via TrueFiling pursuant to California Rules of Court, rule 8.500(d)(1).

**3. By Email:** Served via email to counsel for Coinbase, Inc.:

- Jackie Feick – jackie.feick@nortonrosefulbright.com
- Eric Martin – eric.martin@nortonrosefulbright.com
- Jeffrey Margulies – jeff.margulies@nortonrosefulbright.com

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

Dated: July 9<sup>th</sup>, 2025  
/s/ **Russell Rope**  
*Petitioner In Pro Per*

**More Information Posted**  
@ <https://russellrope.com/real-legaltrilog-revolution>