

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

WILLIAM DEVITT,

Plaintiff,

v.

FLASHDOT LIMITED,

PEKEN GLOBAL LIMITED,

PHOENIXFIN PRIVATE LIMITED,

CHUN GAN, AND

KE TANG,

Defendants.

CIVIL ACTION NO. 24-cv-04944

**DECLARATION OF FRED I. WILLIAMS IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ORDER AUTHORIZING ALTERNATE SERVICE OF PROCESS**

I, Fred I. Williams, declare as follows:

1. I am a partner of Williams Simons & Landis PC and counsel to Plaintiff William Devitt in this case. I make this declaration based on my personal knowledge and would testify truthfully if called upon to do so.
2. Attached hereto as Exhibit A is a true and correct copy of a letter filed on December 3, 2024, in the Southern District of New York, Case No. 24-cv-02255; to the Honorable Valerie E. Caproni, from the corporate Defendants' U.S. counsel (Allen Overy Shearman Sterling US LLP)..
3. Attached hereto as Exhibit B is a true and correct copy of an email exchange, including an attached letter, between Plaintiff's counsel and Defendants, dated December 20, 2024.

4. Attached hereto as Exhibit C is a true and correct copy of an indictment against Defendants filed in the Southern District of New York, from <https://www.justice.gov/usao-sdny/media/1345231/dl>, dated March 2024.

5. Attached hereto as Exhibit D is a true and correct copy of screenshots from <https://rocketreach.co/> and <https://www.clay.com/dossier/kucoin-exchange-ceo>, each website lists Johnny Lyu as the CEO of KuCoin and an email address for Mr. Lyu at johnny@kucoin.com.

6. Attached hereto as Exhibit E is a true and correct copy of an email sent by Plaintiff's counsel to the corporate Defendants' U.S. counsel at Allen Overy Shearman Sterling US LLP, dated January 2, 2025.

7. Attached hereto as Exhibit F is a true and correct copy of an email exchange between Plaintiff's counsel and Defendants, dated January 2, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Travis County, Texas on this 8<sup>th</sup> day of January 2025.

/s/ Fred I. Williams  
Fred I. Williams