

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BIN LI, Individually and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

EQONEX LIMITED, BINANCE GROUP, BIFINITY
UAB, JONATHAN FARNELL, DANIEL LING, ALMIRA
CEMMELL, YU HELEN HAI, and ZHAO CHANGPENG,

Defendants.

No. 23 Civ. 03346 (GHW)

SUPPLEMENTARY DECLARATION OF VICTORIA H. YUHAS

I, Victoria H. Yuhas, at 32 Old Slip, New York, NY 10005, state:

1. I am an associate at Cahill Gordon & Reindel LLP, attorneys for Defendants Binance Group,¹ Bifinity UAB, Jonathan Farnell, Daniel Ling, Almira Cemmell, Yu Helen Hai, and Changpeng Zhao (collectively, the “Defendants”) in the above-captioned action, and am authorized to practice law in this Court. I submit this declaration in support of the Defendants’ March 4, 2024 reply memorandum of law in support of Defendants’ motion to dismiss the Complaint.²

2. Attached hereto as **Exhibit 1** is a true and correct copy of Eqonex’s November 15, 2022 Form 6-K filed with the SEC on the same day and [available](#) on the SEC’s online filing system, EDGAR.

¹ Defendants expressly deny the existence of an entity known as “Binance Group.”

² Capitalized terms used herein have the meaning assigned to them in the Defendants’ January 12, 2024 memorandum of law (ECF No. 47) or, if not defined therein, in the Amended Class Action Complaint (ECF No. 39).

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 4th day of March 2024.

/s/ Victoria H. Yuhas
Victoria H. Yuhas