

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 533 OF 2025
(INTENDED ACTION NO. 32 OF 2025)



BETWEEN BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS

0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS

0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS

0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant

INJUNCTION PROHIBITING DISPOSAL OF ASSETS WORLDWIDE

IMPORTANT

NOTICE TO THE DEFENDANTS

1. This Order prohibits you from dealing with your assets up to the amount stated and from doing other acts set out in this Order.

The Order is subject to exceptions which are set out in the Order. You should read the whole of this document carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the court to vary or discharge this Order.

2. If you disobey this Order you may be found guilty of contempt of court and you and/or any of your directors may be sent to prison or fined or your assets may be seized.

This is a legal document. The consequences of ignoring are serious. If in doubt, you should enquiry as soon as possible at the Registry of the Court issuing the document, namely LG1, High Court Building, 38 Queensway, Hong Kong. You should also consider taking the advice of a solicitor or applying for legal aid.

BEFORE THE HONOURABLE MR JUSTICE LOK IN CHAMBERS

(NOT OPEN TO PUBLIC)

ORDER

An *ex parte* application was made on the 17th day of March 2025 by counsel for BP SG Investment Limited, the Plaintiff, to the Judge who read the draft Writ and the Affirmation Listed in Schedule 1 and accepted the undertakings in Schedule 2 at the end of this Order. After hearing the application, the Judge made the following Order.

IT IS ORDERED that:-

RESTRICTION ON DISPOSAL OF ASSETS AGAINST THE 1ST DEFENDANT

PROPRIETARY INJUNCTION

1. Save for as provided in this paragraph, the 1st Defendant must not, whether by himself or his servants or agents or otherwise howsoever, in any way dispose of or deal with or diminish the value of 17,695.1876019838 ETH transferred from the wallet with the address of 0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0 (the “**First Layer Wallet**”) to the wallet with the address of 0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49 (the “**Second Layer Wallet**”) controlled by the 1st Defendant or their fruits or proceeds, including any interest earned or other income received or derived from the said assets.

WORLDWIDE MAREVA INJUNCTION

2. The 1st Defendant must not:-
 - a. Remove any of its assets in Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the value of 49,516,662.977 USDC or its Hong Kong Dollar equivalent; or
 - b. Dispose of, deal with or diminish the value of any of his assets, whether located within or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the same value specified in a. above. This prohibition specifically includes the following assets:-

- i. The Programmer Wallet (as defined in paragraph 15 below);
 - ii. The First Layer Wallet; and
 - iii. The Second Layer Wallet.
3. Subject to paragraph 1 of this Order, if the total unencumbered value of the 1st Defendant's assets in Hong Kong exceeds the value prescribed for them in paragraph 2.a above (or its Hong Kong Dollar equivalent), the 1st Defendant may remove any of those assets from Hong Kong or dispose of or deal with them, provided that the total unencumbered value of its assets remaining in Hong Kong stays above the value prescribed in paragraph 2.a above (or its Hong Kong Dollar equivalent).
4. Subject to paragraph 1 of this Order, if the total unencumbered value of the 1st Defendant's assets in Hong Kong does not exceed the value prescribed in paragraph 2.a above (or its Hong Kong Dollar equivalent), the 1st Defendant must not remove any of those assets from Hong Kong and must not dispose of or deal with any of them. However, if it has other assets outside Hong Kong, the 1st Defendant may dispose of or deal with those assets, so long as the total unencumbered value of all its assets, whether in or outside Hong Kong remains above the value prescribed in paragraph 2.a above (or its Hong Kong Dollar equivalent).

RESTRICTION ON DISPOSAL OF ASSETS AGAINST THE 2ND DEFENDANT

WORLDWIDE MAREVA INJUNCTION

5. The 2nd Defendant must not:-
 - a. Remove any of its assets in Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the value of 49,516,662.977 USDC or its Hong Kong Dollar equivalent; or
 - b. Dispose of, deal with or diminish the value of any of his assets, whether located within or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the same value specified in 5.a above. This prohibition specifically includes the Programmer Wallet.
6. If the total unencumbered value of the 2nd Defendant's assets in Hong Kong exceeds the value prescribed for them in paragraph 5.a above (or its Hong Kong Dollar equivalent), the 2nd Defendant may remove any of those assets from Hong Kong or dispose of or deal with them, provided that the total unencumbered value of its assets remaining in Hong Kong stays above the value prescribed in paragraph 5.a above (or its Hong Kong Dollar equivalent).
7. If the total unencumbered value of the 2nd Defendant's assets in Hong Kong does not exceed the value prescribed in paragraph 5.a above (or its Hong Kong Dollar equivalent), the 2nd Defendant must not remove any of those assets from Hong Kong and must not dispose of or deal with any of them. However, if it has other assets

outside Hong Kong, the 2nd Defendant may dispose of or deal with those assets, so long as the total unencumbered value of all its assets, whether in or outside Hong Kong remains above the value prescribed in paragraph 5.a above (or its Hong Kong Dollar equivalent).

RESTRICTION ON DISPOSAL OF ASSETS AGAINST THE 3rd DEFENDANT

WORLDWIDE MAREVA INJUNCTION

8. The 3rd Defendant must not:-
 - a. Remove any of its assets in Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the value of 49,516,662.977 USDC or its Hong Kong Dollar equivalent; or
 - b. Dispose of, deal with or diminish the value of any of his assets, whether located within or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the same value specified in 8.a above. This prohibition specifically includes the First Layer Wallet.
9. If the total unencumbered value of the 3rd Defendant's assets in Hong Kong exceeds the value prescribed for them in paragraph 8.a above (or its Hong Kong Dollar equivalent), the 3rd Defendant may remove any of those assets from Hong Kong or dispose of or deal with them, provided that the total unencumbered value of its assets

remaining in Hong Kong stays above the value prescribed in paragraph 2.a above (or its Hong Kong Dollar equivalent).

10. If the total unencumbered value of the 3rd Defendant's assets in Hong Kong does not exceed the value prescribed in paragraph 8.a above (or its Hong Kong Dollar equivalent), the 3rd Defendant must not remove any of those assets from Hong Kong and must not dispose of or deal with any of them. However, if it has other assets outside Hong Kong, the 3rd Defendant may dispose of or deal with those assets, so long as the total unencumbered value of all its assets, whether in or outside Hong Kong remains above the value prescribed in paragraph 8.a above (or its Hong Kong Dollar equivalent).

RESTRICTION ON DISPOSAL OF ASSETS AGAINST THE 4TH DEFENDANT

PROPRIETARY INJUNCTION

11. The 4th Defendant must not, whether by himself or his servants or agents or otherwise howsoever, in any way dispose of or deal with or diminish the value of the 17,695.1876019838 ETH transferred from the First Layer Wallet to the Second Layer Wallet or their fruits or proceeds, including any interest earned or other income received or derived from the said assets.

WORLDWIDE MAREVA INJUNCTION

12. The 4th Defendant must not:-
 - a. Remove any of its assets in Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the

- value of 49,516,662.977 USDC or its Hong Kong Dollar equivalent; or
- b. Dispose of, deal with or diminish the value of any of his assets, whether located within or outside Hong Kong, whether in his own name or not, and whether solely or jointly owned, up to the same value specified in a. above. This prohibition specifically includes the Second Layer Wallet.
13. Subject to paragraph 11 of this Order, if the total unencumbered value of the 4th Defendant's assets in Hong Kong exceeds the value prescribed for them in paragraph 12.a above (or its Hong Kong Dollar equivalent), the 4th Defendant may remove any of those assets from Hong Kong or dispose of or deal with them, provided that the total unencumbered value of its assets remaining in Hong Kong stays above the value prescribed in paragraph 12.a above (or its Hong Kong Dollar equivalent).
14. Subject to paragraph 11 of this Order, if the total unencumbered value of the 4th Defendant's assets in Hong Kong does not exceed the value prescribed in paragraph 12.a above (or its Hong Kong Dollar equivalent), the 4th Defendant must not remove any of those assets from Hong Kong and must not dispose of or deal with any of them. However, if it has other assets outside Hong Kong, the 4th Defendant may dispose of or deal with those assets, so long as the total unencumbered value of all its assets, whether in or outside Hong Kong remains above the value prescribed in paragraph 12.a above (or its Hong Kong Dollar equivalent).

DISCLOSURE OF INFORMATION

15. The 1st Defendant must promptly inform the Plaintiff in writing (1) whether he has access or control over the wallet with the address of 0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1 (the “**Programmer Wallet**”), the First Layer Wallet and/or the Second Layer Wallet; and (2) if he does not have such access or control, whether he has knowledge of the identities of the 2nd, 3rd and/or 4th Defendant (and, if so, inform the Plaintiff of such identities).
16. Each of the 2nd to 4th Defendants must also promptly inform the Plaintiff in writing of their identities and provide their respective addresses for service of court documents.
17. This information outlined in paragraphs 15 to 16 above must be confirmed in an affirmation which must be served on the Plaintiff’s solicitors within 14 days after this Order has been served on the 1st to 4th Defendants.

DURATION OF THIS ORDER

18. This Order will remain in force up to and including 27 March 2025 (the “**Return Date**”), unless before then it is varied or discharged by a further order of the court. The application in which this Order is made shall come back to the Court for further hearing on the Return Date unless the Defendants pays into Court the amounts prescribed for each Defendant in paragraphs 2.a, 8.a and 12.a of this Order, or provide security for those amounts by another method as specified

above, and serve notice indicating that they do not require the application to return to the Court.

EXCEPTIONS TO THIS ORDER

19. This Order shall cease to have effect against the 1st to 4th Defendants if each of them provide security by paying into Court the amounts prescribed for each Defendant in paragraphs 2.a, 8.a and 12.a of this Order, or makes alternative arrangements for security that are agreed upon with the Plaintiff's solicitors or approved by the Court.

EFFECT OF THIS ORDER

20. Each Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.
21. Each Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

THIRD PARTIES

22. *Effect of this Order.* It is a contempt of court for any person notified of this Order knowingly to assist in or permit a breach of this Order.

Any person doing so may be imprisoned, fined, or have his assets seized.

23. *Effect of this Order outside Hong Kong.* The terms of this Order do not affect or concern anyone outside Hong Kong until it is declared enforceable or is enforced by a court in another jurisdiction and then they are to affect him only to the extent they have been declared enforceable or have been enforced UNLESS such person is:
 - a. A person to whom this Order is addressed or an officer or an agent appointed by power of attorney of such a person; or
 - b. A person who is subject to the jurisdiction of this court and (i) has been given written notice of this Order at his residence or place of business within the jurisdiction of this court and (ii) is able to prevent acts or omissions outside the jurisdiction of this court which are a breach or assist in a breach of this Order.
24. *Set off by banks.* This injunction does not prevent any bank from exercising any right of set-off it may have in respect of any facility which it gave to each Defendant before it was notified of this Order.
25. *Withdrawals by each Defendant.* No banks, custodians and/or operators of crypto asset trading platforms/ exchanges need inquire as to the application or proposed application of any money withdrawn by each Defendant if the withdrawal appears to be permitted by this Order.

SERVICE OUT OF THE JURISDICTION AND SUBSTITUTED SERVICE

26. The Plaintiff be granted leave to issue a Concurrent Writ of Summons in these proceedings.
27. Subject to further court order, the Plaintiff be granted leave to serve a copy of the following documents (“**Documents**”) out of jurisdiction on the 1st Defendant in accordance with O. 11 r. 5A of RHC at 2804, Building No. 3, Zhuoyuan Plaza, Jihua 3rd Road, Chancheng District, Foshan City, Guangdong Province, the People’s Republic of China (广东省佛山市禅城区季华三路 63 号 3 座 2804 房):-
 - a. A sealed copy of the Concurrent Writ of Summons accompanied by the prescribed form of Acknowledgment of Service;
 - b. A sealed copy of this Order; and
 - c. Copies of any summons, notice, order, Affirmation, or any other documents relating to or arising out of these proceedings.
28. Subject to further court order, the Plaintiff be granted leave to serve a copy of the Documents out of jurisdiction on the 2nd to 4th Defendants respectively by way of substituted service by:-
 - a. Sending text messages which contain URL links accessible to the Documents to the Programmer Wallet, the First Layer Wallet and the Second Layer Wallet via blockchain transactions and using Blockscan Chat as the medium. Service of the Documents shall constitute good and sufficient service on the Defendants on the day of effecting such service; and

- b. Publishing a notice through the deployment of an immutable NFT directly onto the Ethereum blockchain network, transmitting or “*airdropping*” to each of the Defendants’ Wallets, i.e. the Programmer Wallet, the First Layer Wallet and the Second Layer Wallet. NFT shall embed a URL link to the Documents, which shall contain the notice and which shall include the following information:-
- i. A declaration stating that the specific crypto assets held in the Programmer Wallet, the First Layer Wallet and/or the Second Layer Wallet, including but not limited to the assets traced from the Plaintiff’s funds amounting to 49,516,662.977 USDC, are subject to an ongoing legal dispute and are contentious in nature; and
 - ii. A warning to any subsequent holders of the said crypto assets (if any) once held in those wallets that they cannot claim the status of bona fide purchases without notice of the dispute.

UNDERTAKING

29. The Plaintiff gives to the Court the undertaking set out in Schedule 2 to this Order.

VARIATION OR DISCHARGE OF THIS ORDER

30. The Defendants (or anyone notified of this Order) may apply to the Court at any time to vary or discharge this Order (or so much of it as affects that person), but anyone wishing to do so should first inform the Plaintiff's solicitors.

COSTS

31. The costs of this application be reserved.

NAME AND ADDRESS OF PLAINTIFF'S SOLICITORS

32. The Plaintiff's solicitors are:-

Name: Howse Williams
Address: 27/F, Alexandra House,
 18 Chater Road,
 Central, Hong Kong
Tel: 2803 3688
Fax: 2803 3608
Reference: JCHC/I.00959.00001

INTERPRETATION OF THIS ORDER

33. In this Order, "he", "him" or "his" include "she", "her", "hers" and "it" or "its".

34. When there are two or more Defendants herein (unless otherwise stated):-
- a. References to "*the Defendants*" mean both or all of them;
 - b. An order requiring "*the Defendants'* to do or not to do anything requires each Defendant to do it or not to do it; and
 - c. A requirement relating to service of this Order, or of any legal proceedings on "*the Defendants*" means on each of them.

Dated the 17th day of March 2025

Registrar

SCHEDULE 1
Affirmation

The Judge read the following affirmation before making this Order:-

1. A draft Writ; and
2. The Affirmation of CHOU CHRISTIAN-LONG dated 17 March 2025 together with the exhibit(s) referred to therein.

SCHEDULE 2
Undertakings given to the Court by the Plaintiff

1. If the Court later finds that this Order has caused loss to the Defendants or any other party and decides that the Defendants or that other party should be compensated for that loss, the Plaintiff will comply with any order the Court may make.
2. As soon as practicable the Plaintiff will issue and serve on the Defendants a Concurrent Writ of Summons in the form of the draft Writ produced to the Court together with this Order.
3. As soon as practicable the Plaintiff will cause the affirmation(s) produced to the Court and listed in Schedule 1 hereof to be filed.
4. As soon as practicable the Plaintiff will serve on the Defendants a summons to be heard on the Return Date together with a copy of the affirmation(s) and copiable exhibits containing the evidence relied on by the Plaintiff and a copy of the skeleton argument used at the application for this Order. Unless impracticable photographs of non-copiable exhibits should also be served.
5. Anyone notified of this Order will be given a copy of it by the Plaintiff's solicitors.
6. The Plaintiff will pay the reasonable costs of anyone other than the Defendants which have been incurred as a result of this Order including the costs of ascertaining whether that person holds any of the Defendants' assets and if the Court later finds that this Order has

caused such a person loss, and decides that such person should be compensated for that loss, the Plaintiff will comply with any order the Court may make.

7. The Plaintiff will not without the leave of the Court seek to enforce this Order outside Hong Kong.
8. If for any reason this Order ceases to have effect (including in particular where the Defendants provide security as provided for above), the Plaintiff will forthwith take all reasonable steps to inform, in writing, any person or company to whom it has given notice of this Order, or who it has reasonable grounds for supposing may act upon this Order, that it has ceased to have effect.

TAKE NOTICE

This is a legal document. The consequences of ignoring it may be serious. If in doubt, you should enquire as soon as possible at the Registry of the Court issuing the document, namely, High Court, Hong Kong at LG1, High Court Building, No. 38 Queensway, Hong Kong. You should also consider taking the advice of a Solicitor or apply for Legal Aid.

請注意

因這是法律文件，忽視它可帶來嚴重的後果。如有疑問，請儘早向發出文件的法庭登記處(香港高等法院：香港金鐘道三十八號高等法院大樓 LG1 字樓)查詢。你亦應考慮聽取律師的意見或請申請法律援助。

PENAL NOTICE

TAKE NOTICE that if you being the within-named Defendants, disobey or neglect to obey this Order by the time therein limited, you will be liable to process of execution for the purpose of compelling you to obey the same and may be cited for contempt of Court.

Dated the 17th day of March 2025

Howse Williams
Solicitors for the Plaintiff

懲罰通知

倘若你，作為上述案件其中一位被告人，在限定的時間內不服從或忽略服從本命令，你可被裁定藐視法庭罪，本行亦可針對你進行執行的法律程序，以強迫你服從本命令。

2025年3月17日

何韋律師行
原告人之代表律師

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
ACTION NO. 533 OF 2025
(INTENDED ACTION NO. 32 OF 2025)

BETWEEN

BP SG INVESTMENT LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

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3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant

ORDER

Dated the 17th day of March 2025
Filed on the 18th day of March 2025

 **Howse Williams**
Howse Williams
27th Floor, Alexandra House
18 Chater Road
Central, Hong Kong
Tel: 2803 3688
Fax: 2803 3608
Our Ref: JCHC/I.00959.00001
Solicitors for the Plaintiff

yet for service out
of the jurisdiction
Claim nature:
A. Mixed Claim
B. Tort / Trust



No. 1

HCA 533 / 2025

Intended Action No. 32 / 2025

Concurrent Writ/Originating Summons
issued on 20 MAR 2025

pursuant to Order of Master/Mr Justice

dated 17 MAR 2025



IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025

533

BETWEEN

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and
CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
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2nd Defendant

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3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant

WRIT OF SUMMONS

TO: THE 1ST DEFENDANT, CHEN SHANXUAN (陈善轩) whose last known address is at 2804, Building No. 3, Zhuoyuan Plaza, Jihua 3rd Road, Chancheng District, Foshan City, Guangdong Province, the People's Republic of China (广东省佛山市禅城区季华三路 63 号 3 座 2804 房)

THE 2ND DEFENDANT, AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1 of unknown address

THE 3RD DEFENDANT, AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0 of unknown address

THE 4TH DEFENDANT, AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49 of unknown address

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the back.

Within (14 days) after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Registry of the High Court the accompanying ACKNOWLEDGMENT OF SERVICE stating therein whether you intend to contest these proceedings or to make an admission.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings or to make an admission, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

*[If you intend to make an admission, you may complete an appropriate form enclosed in accordance with the accompanying Directions for Acknowledgment of Service.]

Issued from the Registry of the High Court this 18th day of March 2025.

Registrar

Note:—This Writ may not be served later than 12 calendar months beginning with that date unless renewed by order of the Court.

IMPORTANT

Directions for Acknowledgment of Service are given with the accompanying form.

申索性質:
A. 混合索賠
B. 侵權/信託

表格 1

HCA 533/2025

Intended Action No. 32 / 2025

香港特別行政區
高等法院原訟法庭
高院擬進行的民事訴訟 2025 年第 32 號
533

BP SG INVESTMENT HOLDING LIMITED

原告人

對

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

第二被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

第三被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

第四被告人

傳訊令狀

致被告人(姓名或名稱).....

地址為.....

本傳訊令狀已由上述原告人就背頁所列出的申索而針對你發出。

在本令狀送達你後(14天)內(送達之日計算在內)，你必須了結該申索或將隨附的送達認收書交回高等法院登記處，並在認收書中述明你是否擬就本法律程序提出爭議或作出承認。

如你沒有在上述時限內了結該申索或交回送達認收書，或如你交回送達認收書但沒有在認收書中述明擬就本法律程序提出爭議或作出承認，則原告人可繼續進行訴訟，而判你敗訴的判決可隨即在無進一步通知發出的情況下予以登錄。

*[你如擬作出承認，可按照隨附的關於送達認收書的指示，填寫適當的附上的表格。]

本令狀於今天，即20_____年_____月_____日由高等法院登記處發出。

司法常務官

備註：一本令狀除非經由法庭命令予以續期，否則不得在發出日期起計12個公曆月之後送達。

重要事項

關於送達認收書的指示載於隨附的表格。

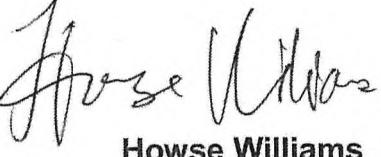
Indorsement of Claim

THE PLAINTIFF CLAIMS AGAINST THE 1ST TO 4TH DEFENDANTS FOR

- (1) A declaration that each of the Defendants as trustee or constructive trustee, is liable to account for the loss of 49,516,662.977 USDC (“**Defrauded Assets**”) worth approximately US\$49,514,583.28 they had received through the wallet with the address: 0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1, which was at the time controlled and operated by the 1st Defendant (the “**Programmer Wallet**”), the wallet with the address of 0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0 (“**First Layer Wallet**”) and the wallet with the address of 0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49 (the “**Second Layer Wallet**”), including the traceable proceeds thereof, and an order that each of the Defendants pays to the Plaintiff those crypto assets, payments and profits due on taking of account;
- (2) A declaration that the Defrauded Assets paid into the Programmer Wallet, the First Layer Wallet and the Second Layer Wallet belong to the Plaintiff as at the time of receipt;
- (3) An injunction restraining each of the Defendants, whether by themselves or their servants or agents or otherwise, from disposing of or otherwise dealing with the Defraud Assets they received through the Programmer Wallet, the First Layer Wallet and the Second Layer Wallet, save and except any payment, delivery up or transfer to the Plaintiff;
- (4) An order that the 1st to 4th Defendants do compensate and/or account to the Plaintiff in equity;
- (5) An order for the payment to the Plaintiff by the 1st to 4th Defendants of all sums found due;
- (6) All necessary consequential or further accounts, inquiries or orders;

- (7) Further or alternatively, the sum of 49,516,662.977 USDC (or its Hong Kong Dollar equivalent at the time of payment);
- (8) Interest pursuant to section 49 of the High Court Ordinance (Cap. 4);
- (9) Further or other relief as the Court may deem fit; and
- (10) Costs.

Dated the 18th day of March 2025

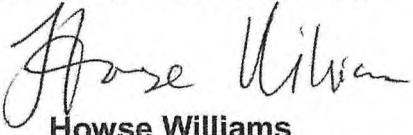


Howse Williams
Solicitors for the Plaintiff

A statement of claim must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

(Where the Plaintiff's claim is for a debt or liquidated demand only: If, within the time for returning the Acknowledgment of Service, the Defendant pays the amount claimed and \$ _____ for costs, further proceedings will be stayed. The money must be paid to the Plaintiff or his Solicitor.)

THIS WRIT was issued by Messrs. Howse Williams of 27/F, Alexandra House, 18 Chater Road, Central, Hong Kong, Solicitors for the said Plaintiff whose registered office address is Room No. R143, 3/F, Eton Tower, 8 Hysan Avenue, Causeway Bay, Hong Kong.



Howse Williams
Solicitors for the Plaintiff

凡原告人只就一筆債項或經算定的索求款項提出申索：如在交回送達認收書的時限內，
被告人支付所申索的款額以及\$_____作為訟費，則進一步的法律程序會
被擋置。該筆款項必須付給原告人或其律師。

本令狀是由代表上述原告人的何韋律師行發出，其地址為中國香港特別行政區中環遮打道 18 號歷山大廈 27 樓，而該原告人的地址則為

及（如原告人並非居於本司法管轄權範圍內）其接受送達地址為

何韋律師行
原告人之代表律師

NOTE

This is a legal document. The consequences of ignoring it may be serious. If in doubt, you should enquire as soon as possible at the Registry of the Court issuing the document, namely, the High Court Registry, LG1 High Court Building, 38 Queensway, Hong Kong SAR, China. You should also consider taking the advice of a Solicitor or applying for Legal Aid.

因這是法律文件，忽視它可帶來嚴重的後果。如有疑問，請儘早向發出文件的法院登記處，即高等法院登記處，LG1高等法院大廈，金鐘道三十八號查詢。你亦應考慮聽取律師的意見或是申請法律援助。

No. 14
Acknowledgement of Service of Writ of Summons
Directions for Acknowledgment of Service

1. The accompanying form of ACKNOWLEDGMENT OF SERVICE should be detached and completed by a Solicitor acting on behalf of the Defendant or by the Defendant if acting in person. After completion it must be delivered or sent by post to the Registry of the High Court at the following address: –
"LG1, High Court Building, 38 Queensway, Hong Kong SAR, China".

2. A Defendant who states in his Acknowledgment of Service that he intends to contest the proceedings MUST ALSO file a DEFENCE which must be written in either the Chinese or the English language with the registry and serve a copy thereof on the Solicitor for the Plaintiff (or on the Plaintiff if acting in person).

If a Statement of Claim is indorsed on the Writ (i.e. the words "Statement of Claim" appear at the top of the back), the Defence must be filed and served within 28 days after the time for acknowledging service of the Writ, unless in the meantime a summons for judgment is served on the Defendant.

If a Statement of Claim is not indorsed on the Writ, the Defence must be filed and served within 28 days after a Statement of Claim has been served on the Defendant.

If the Defendant fails to file and serve his Defence within the appropriate time, the Plaintiff may enter judgment against him without further notice.

The Defendant's Defence must be verified by a statement of truth in accordance with Order 41A of the Rules of the High Court (Cap. 4 sub. leg. A).

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, you may admit the Plaintiff's claim in whole or in part by completing Form No. 16 or 16C (as the case may require) accompanying the Writ of Summons.

A completed Form No. 16 or 16C must be filed with the Registry of the High Court and served on the Plaintiff [or the Plaintiff's Solicitors] within the period for service of the Defence.

4. A Defendant who wishes to dispute the jurisdiction of the Court of First Instance in the proceedings or to argue that the Court of First Instance should not exercise its jurisdiction in the proceedings, and wishes to apply to the Court of First Instance for an order staying the proceedings, must give notice of intention to defend the proceedings and make the application within the time limited for service of a defence.

See attached Notes for Guidance

Notes for Guidance

1. Each Defendant (if there are more than one) is required to complete an Acknowledgment of Service and return it to the Registry of the High Court.
2. For the purpose of calculating the period of 14 days for acknowledging service, a writ served on the Defendant personally is treated as having been served on the day it was delivered to him and a writ served by post or by insertion through the Defendant's letter box is treated as having been served on the seventh day after the date of posting or insertion.]

(Note: Not applicable if the Defendant is a company served at its registered office.)

3. Where the Defendant is sued in a name different from his own, the form must be completed by him with the addition in paragraph 1 of the words "sued as (the name stated on the Writ of Summons)".
4. Where the Defendant is a FIRM and a Solicitor is not instructed, the form must be completed by a PARTNER by name, with the addition in paragraph 1 of the description "partner in the firm of (.....)" after his name.
5. Where the Defendant is sued as an individual TRADING IN A NAME OTHER THAN HIS OWN, the form must be completed by him with the addition in paragraph 1 of the description "trading as (.....)" after his name.

6. Where the Defendant is a LIMITED COMPANY the form must be completed by a Solicitor or by someone authorized to act on behalf of the Company, but the Company can take no further step in the proceedings without a Solicitor acting on its behalf.
7. Where the Defendant is a MINOR or a MENTAL Patient, the form must be completed by a Solicitor acting for a guardian ad litem.

8. A Defendant acting in person may obtain help in completing the form at the Registry of the High Court.

9. These notes deal only with the more usual cases. In case of difficulty a Defendant in person should refer to paragraph 8 above.

表格14
傳訊令狀送達認收書
關於送達認收書的指示

- 隨附的送達認收書表格應由代表被告人行事的律師撕下及填寫，或如被告人是親自行事，則應由被告人撕下及填寫。表格填妥後必須交付或以郵遞方式送交高等法院登記處，登記處的地址是：一
中國香港特別行政區金鐘道38號高等法院低層1樓

- 被告人如在其送達認收書中表示擬就法律程序提出爭議，則必須亦將一份抗辯書送交高等法院登記處存檔，該份抗辯書必須以中文或英文寫成，其文本並必須送達原告人的代表律師(或如原告人是親自行事，則送達原告人)。

如令狀註有申索陳述書(即在背頁上端出現“申索陳述書”等字)，則除非在對令狀作認收送達的時限後28天內有要求作判決的傳票送達被告人，否則必須在該段時限內將抗辯書送交存檔及送達。

令狀並無註有申索陳述書，則必須在申索陳述書送達被告人後28天內將抗辯書送交存檔及送達。

如被告人沒有在適當時限內將其抗辯書送交存檔及送達，則原告人可不發出進一步通知而登錄判被告人敗訴的判決。

被告人的抗辯書必須按照《高等法院規則》(第4章，附屬法例A) 第41A號命令，以屬實申述核實。

- 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，你可藉填寫隨附於傳訊令狀的表格16或16C(視乎情況所需)，承認原告人的整項申索或其部分。

填妥的表格16或16C必須在送達抗辯書的限期內，送交高等法院登記處存檔，並送達原告人[或原告人的律師]。

- 被告人如意欲對原訟法庭在法律程序中的司法管轄權提出爭議，或意欲辯稱原訟法庭不應在有關法律程序中行使其司法管轄權，並意欲向原訟法庭提出申請，要求作出擱置法律程序的命令，必須就法律程序發出擬抗辯通知書，並必須在送達抗辯書的時限內提出申請。

見隨附的填寫指引/

填寫指引

- 每一名被告人(如被告人多於一名)均須填寫一份送達認收書，並將之交回高等法院登記處。
- 為計算作認收送達的14天期限，面交送達被告人的令狀視作已在其交付被告人之日送達，而以郵遞或投入被告人信箱的方式送達的令狀，則視作已在投寄或投入被告人信箱之日後第七天送達。]
(備註：如被告人是一間公司而令狀是在該公司的註冊辦事處送達，則此條並不適用。)
- 凡被告人是以有別於其本身姓名或名稱的姓名或名稱被起訴，表格必須由他填寫，並須在第1段中加上“以(傳訊令狀所說明的姓名或名稱)之名被起訴”等字。
- 凡被告人是一間商號，且並沒有指示律師代為行事，表格必須由一名合夥人以其姓名或名稱填寫，並須在第1段中在其姓名或名稱之後加上“(.....)商號的合夥人”的描述。
- 凡被告人是以個人身分以其本身姓名以外的名稱營業而被起訴，表格必須由他填寫，並須在第1段中在其姓名之後加上“以(.....)之名營業”的描述。
- 凡被告人是一間有限公司，表格必須由律師或獲授權代該公司行事的人填寫，但該公司如無律師代表行事，則不得在法律程序中採取進一步的步驟。
- 凡被告人是未成年人或精神病人，表格必須由辯護監護人的代表律師填寫。
- 親自行事的被告人可在高等法院登記處獲取協助填寫表格。
- 本填寫指引只適用於比較普通的案件，親自行事的被告人如有困難應參閱上文第8段。

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025

BETWEEN

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant**CONCURRENT****ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS**

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, **THIS FORM MAY HAVE TO BE RETURNED.**

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

see Notes 1, 3,
4 and 5

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.
2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

YES NO

See Direction 3

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

YES NO

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Writ of Summons.

Where words
appear between
square
brackets, delete
if inapplicable

Service of the Writ is acknowledged accordingly.

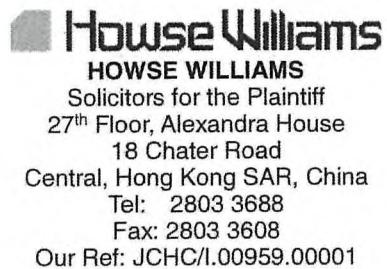
[Solicitor]/ [Defendant in person]

Address for service

Notes as to Address for Service

Solicitor: Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong SAR, China

Defendant in person: Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong SAR, China, he must give an address in Hong Kong SAR, China where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.



IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025

BETWEEN

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
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0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
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3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49
CONCURRENT

4th Defendant**ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS**

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.

Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, *THIS FORM MAY HAVE TO BE RETURNED.*

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

see Notes 1, 3,
4 and 5

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.

2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

YES NO

See Direction 3

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

YES NO

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Writ of Summons.

Where words
appear between
square
brackets, delete
if inapplicable

Service of the Writ is acknowledged accordingly.

[Solicitor]/ [Defendant in person]

Address for service

Notes as to Address for Service

Solicitor: Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong SAR, China

Defendant in person: Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong SAR, China, he must give an address in Hong Kong SAR, China where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.



IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025

BETWEEN

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
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ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49
CONCURRENT

4th Defendant

ACKNOWLEDGMENT OF SERVICE OF WRIT OF SUMMONS

If you intend to instruct a Solicitor to act for you, give him this form IMMEDIATELY.



Important. Read the accompanying directions and notes for guidance carefully before completing this form. If any information required is omitted or given wrongly, *THIS FORM MAY HAVE TO BE RETURNED.*

Delay may result in judgment being entered against a Defendant whereby he or his Solicitor may have to pay the costs of applying to set it aside.

see Notes 1, 3,
4 and 5

1. State the full name of the Defendant by whom or on whose behalf the service of the Writ is being acknowledged.
2. State whether the Defendant intends to contest the proceedings (tick appropriate box)

<input type="checkbox"/> YES	<input type="checkbox"/> NO
------------------------------	-----------------------------

See Direction 3

3. If the only remedy that the Plaintiff is seeking is the payment of a liquidated amount of money or the payment of an unliquidated amount of money, state whether the Defendant intends to make an admission (tick appropriate box).

<input type="checkbox"/> YES	<input type="checkbox"/> NO
------------------------------	-----------------------------

If yes, the Defendant may make the admission by completing Form No. 16 or 16C (as the case may require) accompanying the Writ of Summons.

Where words
appear between
square
brackets, delete
if inapplicable

Service of the Writ is acknowledged accordingly.

[Solicitor]/ [Defendant in person]

Address for service

Notes as to Address for Service

Solicitor: Where the Defendant is represented by a Solicitor, state the Solicitor's place of business in Hong Kong SAR, China

Defendant in person: Where the Defendant is acting in person, he must give his residence OR, if he does not reside in Hong Kong SAR, China, he must give an address in Hong Kong SAR, China where communications for him should be sent. In the case of a limited company, "residence" (居所) means its registered or principal office.



香港特別行政區
高等法院原訟法庭
高院擬進行的民事訴訟 2025 年第 23 號
533

BP SG INVESTMENT HOLDING LIMITED

原告人

對

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

第二被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

第三被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

第四被告人

並存傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引 1、3、1. 说明對令狀作認收送達或由他人代為對令狀作認收送達的
4 及 5。 被告人的全名。

2. 说明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“√”號)

 是 否

見指示 3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，說明被告人
是否擬作出承認。
(在適用的方格內加上“√”號)。

 是 否

如擬作出承認，被告人可藉填寫隨附於傳訊令狀的表格 16 或 16C (視乎情況所
需) 而作出承認。

方括號內字句
如不適用請予
·刪去。

本人據此對令狀作認收送達。

(簽署)[律師] [無律師代表的被告人]

送達地址

關於送達地址的備註

律師： 凡被告人是由律師代表，述明該律師在中國香港特別行政區的營業地點。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於中國香港特別行政區，則必須填上一個給予他的通訊所應送交的中國香港特別行政區地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。



何韋律師行

原告人代表律師

中國香港特別行政區

中環遮打道18號

歷山大廈27樓

電話：2803 3688 傳真：2803 3608

(檔案編號: JCHC/I.00959.00001)

香港特別行政區
高等法院原訟法庭
高院擬進行的民事訴訟 2025 年第 533 號

BP SG INVESTMENT HOLDING LIMITED

原告人

對

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

第二被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

第三被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

第四被告人

並存 傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引 1、3、1. 说明對令狀作認收送達或由他人代為對令狀作認收送達的
4 及 5。 被告人的全名。

2. 说明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“√”號)

 是 否

見指示 3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，說明被告人是否擬作出承認。
(在適用的方格內加上“√”號)。

 是 否

如擬作出承認，被告人可藉填寫隨附於傳訊令狀的表格 16 或 16C (視乎情況所
需) 而作出承認。

方括號內字句
如不適用請予
·刪去。

本人據此對令狀作認收送達。

(簽署)[律師] [無律師代表的被告人]

送達地址

關於送達地址的備註

律師： 凡被告人是由律師代表，述明該律師在中國香港特別行政區的營業地點。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於中國香港特別行政區，則必須填上一個給予他的通訊所應送交的中國香港特別行政區地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。



何韋律師行

原告人代表律師

中國香港特別行政區

中環遮打道18號

歷山大廈27樓

電話：2803 3688 傳真：2803 3608

(檔案編號: JCHC/I.00959.00001)

香港特別行政區
高等法院原訟法庭
高院擬進行的民事訴訟 2025 年第 533 號

BP SG INVESTMENT HOLDING LIMITED

原告人

對

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

第二被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

第三被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS ACCESS
TO OR OPERATES THE WALLET WITH THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

第四被告人

並存 傳訊令狀送達認收書

如你擬指示律師代為行事，請立即將本表格交給他。

重要事項：填寫本表格前請小心閱讀隨附的指示及填寫指引。如錯誤提供任何所需資料或該等資料有所遺漏，則本表格可能須予退回。

任何延遲可能會導致登錄判被告人敗訴的判決，而被告人或其律師可能須支付申請將該判決作廢的訟費。

見指引 1、3、1. 说明對令狀作認收送達或由他人代為對令狀作認收送達的
4 及 5。 被告人的全名。

2. 说明被告人是否擬就法律程序提出爭議。
(在適用的方格內加上“√”號)

 是 否

見指示 3。 3. 如原告人尋求的唯一補救，是支付經算定款項或支付未經算定款項，說明被告人
是否擬作出承認。
(在適用的方格內加上“√”號)。

 是 否

如擬作出承認，被告人可藉填寫隨附於傳訊令狀的表格 16 或 16C (視乎情況所
需) 而作出承認。

方括號內字句
如不適用請予
·刪去。

本人據此對令狀作認收送達。

(簽署) [律師] [無律師代表的被告人]

送達地址

關於送達地址的備註

律師： 凡被告人是由律師代表，述明該律師在中國香港特別行政區的營業地點。

無律師代表的被告人：凡被告人是親自行事，被告人必須填上其居所，或如被告人並非居於中國香港特別行政區，則必須填上一個給予他的通訊所應送交的中國香港特別行政區地址。如屬有限公司，“居所”(residence)指其註冊或主要辦事處。



No. 16C
Admission (unliquidated amount)
(O. 13A rr. 6(2), 7(2) & 13(2))

HCA 533/2025
Intended Action No. 32 / 2025

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025

533

BETWEEN

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS

0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant

Explanatory Note

1. The only claim the plaintiff has made against you is for an unliquidated amount of money. You may admit the plaintiff's claim in whole or in part by completing this form –
 - (a) within the period for service of your defence if you have been served with a writ; or
 - (b) the period for filing of your affidavit evidence if you have been served with an originating summons; or
 - (c) within 14 days after service of the originating process in any other case.
2. If you have made an admission, you may only be allowed to amend or withdraw your admission if the Court considers it just to do so.
3. You may offer a specified amount to satisfy the claim. If the amount you offer is accepted by the plaintiff, the plaintiff may request the Court to enter judgment against you for that amount. Alternatively, the plaintiff may request the court to enter judgment against you for an amount to be decided by the Court and costs.
4. You may also ask for time to pay. If the plaintiff does not accept your proposal for payment, the Court will decide how the payment should be made after considering –
 - (a) the information set out in this form;
 - (b) the reasons why the plaintiff does not accept your proposal for payment; and
 - (c) all other relevant matters.
5. The completed form should be filed in the Registry of the High Court.

How to fill in this form

- Tick the correct boxes and give as much information as you can. **Then sign and date the form.** If necessary provide details on a separate sheet, add the action number and attach it to this form.
- **If you do not ask for time to pay, you need not complete items 2 to 9 and 11 and 12.**
- **If you are not an individual, you need not complete items 1 to 9 but you should complete items 10 to 12 and ensure that you comply with the requirement specified in item 13 and provide sufficient details about the assets and liabilities of your firm, company or corporation to support any offer of payment made.**
- **If you are an individual, you need not complete items 10 to 12 and need not comply with the requirement specified in item 13.**
- You can get help to complete this form at the Registry of the High Court.

Part A Response to claim (*tick one box only*)

- I admit liability for the whole claim but want the Court to decide the amount I should pay (if you tick this box, you need not complete Part B and items 2 to 9, 11 and 12 and need not comply with the requirement specified in item 13)

OR

- I admit liability for the claim and offer to pay in satisfaction of the claim

Part B How are you going to pay the amount you have admitted? (*tick one box only*)

- I offer to pay on (date)

OR

- I cannot pay the amount immediately because (*state reason*)

AND

I offer to pay by instalments of \$ per(week)(month)
starting (date)

1. Personal details

Surname

Forename

Mr Mrs Miss Ms

Address

2. Dependants (people you look after financially)

(give details)

3. Employment

I am employed as a

My employer is

Jobs other than main job
(give details)

I am self employed as a

Annual turnover is

\$

I am not in arrears with my mandatory provident fund contributions and income tax

I am in arrears and I owe

\$

Give details of :

(a) contracts and other work in hand

(b) any sums due for work done

- I have been unemployed for
 I am a pensioner

4. Bank account and savings (please list all)

Bank account	In credit by \$	Overdrawn by \$

5. Residence

- I live in my own flat
 my jointly owned flat
 public housing estate
 rented private flat
 others (please specify)

6. Income

My usual take-home pay (including overtime, commission, bonuses etc)	\$	per month
My pension(s)	\$	per month
Others living in my home give me	\$	per month
Other income (give details below)		
	\$	per month
	\$	per month
	\$	per month
Total income	\$	per month

7. Other assets (please list and indicate their location)

8. Expenses

(Do not include any payments made by other members of the household out of their own income)

I have regular expenses as follows:

Mortgage (including second mortgage)	\$	per month
Rent	\$	per month
Rates and government rent	\$	per month
Management fees	\$	per month
Domestic helper's salary	\$	per month
Gas	\$	per month
Electricity	\$	per month
Water charges	\$	per month
Telephone charges	\$	per month
Housekeeping, food, school meals	\$	per month
Travelling expenses	\$	per month
Children's clothing	\$	per month
Tuition fees	\$	per month
Maintenance payments	\$	per month
Court orders	\$	per month
Others		
	\$	per month
Total expenses	\$	per month

9. Liabilities

(This section is for arrears only. Do not include regular expenses listed in item 8.)

Rent arrears	\$
Mortgage arrears	\$
Rates and government rent arrears	\$
Water charges arrears	\$
Fuel debts : Gas	\$
Electricity	\$
Others	\$
Maintenance arrears	\$
Loans and credit card debts (<i>please list</i>)	\$
	\$
	\$
Others (<i>give details below</i>)\$	
	\$
	\$
Total liabilities	\$

10. Firm, company or corporation

Name	
Address	
Tel. no.	

11. Assets of firm, company or corporation (*please list*)

Property, plant and equipment		\$
Inventories		\$
Goodwill and other intangible assets		\$
Loans and receivables		\$
Bank balances and cash		\$
Others		\$
Total		\$

12. Liabilities of firm, company or corporation (please list)

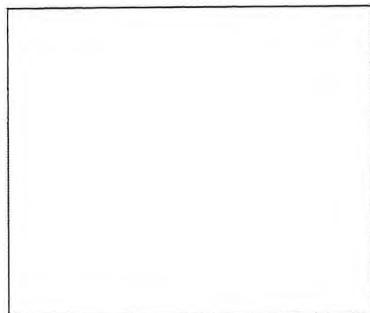
Trade payables		\$
Tax payables		\$
Other payables		\$
Bank loans		\$
Other borrowings		\$
Others		\$
Total		\$

13. Attach to this form a copy of the latest audited profit and loss account and balance sheet of the firm, company or corporation.

14. Declaration I _____ declare that the details I have given above and in the attached sheet(s) (if any) are true to the best of my knowledge

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declaration Ordinance (Cap. 11)

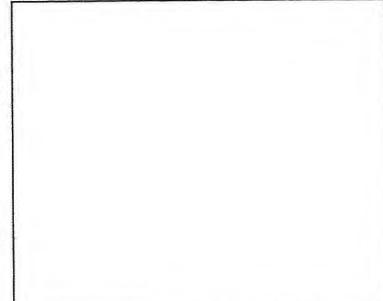
Signed



Position or office held

(If signing on behalf of a firm, company or corporation)

**With company chop
(if applicable)**



Declared at _____ in Hong Kong on _____ of 20 _____.

Before me

[Signature and designation, i.e.,
Justice of the Peace/Notary
Public/Commissioner for Oaths.]

Note Under section 36 of the Crimes Ordinance (Cap. 200), a person who knowingly and wilfully makes a statement false in a material particular in a declaration or other document which he is authorized or required to make by an enactment is guilty of an offence.

- A defendant who is an individual must sign personally. A director of a company must obtain leave to represent the company from a Practice Master before he may sign on behalf of the company.
- If a plaintiff does not file a request for judgment within 14 days after this form is served on him, his claim is stayed until he files the request.

表格 16C
承認(未經算定款額)
(第 13A 號 命 令 第 6(2)、7(2)及 13(2)條規則)

HCA 533 / 2025
Intended Action No. 32 / 2025

香港特別行政區
高等法院
原訟法庭
高院擬進行的民事訴訟 2025 年第 32 號
533

BP SG INVESTMENT HOLDING LIMITED

原告人

對

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

第二被告人

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第三被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH THE
ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

第四被告人

註釋

1. 原告人針對你而提出的唯一申索，是未經算定款項。你可在下述限期內，藉填寫本表格而承認原告人的整項申索或其部分 —
 - (a) (如你已獲送達令狀) 送達抗辯書的限期；或
 - (b) (如你已獲送達原訴傳票) 將你的誓章證據送交存檔的期限；或
 - (c) (在任何其他情況下) 送達原訴法律程序文件後 14 天。
2. 如你已作出承認，你僅會在法庭認為容許你修訂或撤回你的承認屬公正的情況下，獲容許修訂或撤回你的承認。
3. 你可提議一個指明的款額以了結申索。如你提議的款額獲原告人接受，則原告人可請求法庭登錄判你須支付該款額的判決。另一做法是原告人可請求法庭登錄判你須支付有待法庭決定的款額以及訟費的判決。
4. 你亦可要求給予時間以作付款。如原告人不接受你的付款建議，法庭在考慮下述事宜後，會決定應如何作出付款 —
 - (a) 本表格列出的資料；
 - (b) 原告人不接受你的付款建議的原因；及
 - (c) 所有其他有關事宜。
5. 已填妥的表格應送交高等法院登記處存檔。

如何填寫本表格

- 在正確的方格內加上“✓”號，並盡可能提供最詳盡的資料。然後在表格上簽署和註明日期。如有需要，可另紙提供詳細資料，加上有關訴訟編號，並將其夾附於本表格。
- 如你不要求給予時間以作付款，則不必填寫第 2 至 9 項以及第 11 及 12 項。
- 如你並非個人，則不必填寫第 1 至 9 項，但你應填寫第 10 至 12 項，並確保你遵守第 13 項指明的規定，以及就你的商號、公司或法團的資產及負債提供足夠的詳細資料，以支持所作出的任何付款提議。
- 如你是個人，則不必填寫第 10 至 12 項，亦不必遵守第 13 項指明的規定。
- 你可在高等法院登記處，得到關於填寫本表格的協助。

A 部 對申索的回應(僅在一個方格內加上“✓”號)

本人承認整項申索的法律責任，但希望法庭決定本人應支付的款額(如你在本方格內加上“✓”號，則不必填寫 B 部及第 2 至 9 項、第 11 及 12 項，亦不必遵守第 13 項指明的規定)

或

本人承認申索的法律責任，並提議支付 以了結申索

B 部 你將如何支付已承認的款額?(僅在一個方格內加上“✓”號)

本人提議在(日期) 付款

或

本人不能即時付款，理由是(述明理由)

及

本人提議分期付款，
每(星期)(月)支付

\$

並由
(日期)

 開始
付款

1. 個人詳細資料

姓

名

先生 夫人 小姐 女士

地址

2. 受養人(接受你財政照顧的人)

(提供詳細資料)

3. 受僱情況

本人受僱為

本人的僱主為

主要工作以外的工作

(提供詳細資料)

本人自僱從事

每年營業額為

\$

本人並無拖欠本人的強制性公積金供款及入息稅

本人有拖欠款項，

所欠款額為

\$

提供以下項目的詳細資料：

(a) 手上的合約及其他工作

• (b) 已進行工作的任何未付款項

--	--	--

本人已失業，為期

年 個月

--	--	--

本人為領取退休金的人

4. 銀行 帳戶及儲蓄 (請全數列出)

銀行帳戶	貸項款額 \$	透支款額 \$

5. 居所

- 本人居於
- 自置居住單位
 - 本人的聯名擁有居住單位
 - 公共屋邨
 - 租住私人單位
 - 其他(請指明)

6. 入息

本人通常的實得收入(包括超時收入、佣金、花紅等)	每月 \$
本人的退休金	每月 \$
居於本人家中的其他人給本人的款項	每月 \$
其他入息(在下面提供詳細資料)	
	每月 \$
	每月 \$
	每月 \$
總入息	每月 \$

7. 其他資產 (請列出和示明其所在)

8. 開支

(請勿包括住戶中其他成員自其本身入息作出的任何付款)

本人有以下定期開支：	
按揭 (包括第二按揭)	每月 \$
租金	每月 \$
差餉及地租	每月 \$
管理費	每月 \$
家庭傭工薪金	每月 \$
石油氣／煤氣費	每月 \$
電費	每月 \$
水費	每月 \$
電話費	每月 \$
家務開支、食物、學校膳食	每月 \$
交通費	每月 \$
子女衣服	每月 \$
學費及補習費	每月 \$
贍養費	每月 \$
法院命令	每月 \$
其他	每月 \$
總開支	每月 \$

9. 負債

(本項僅供填寫欠款。請勿包括第 8 項中列出的定期開支。)

租金欠款	\$
按揭欠款	\$
差餉及地租欠款	\$
水費欠款	\$
燃料債項：石油氣／煤氣費	\$
電費	\$
其他	\$
贍養費欠款	\$
貸款及信用卡債項(請列出)	\$
其他(在下面提供詳細資料)	
	\$
總負債	\$

10. 商號、公司或法團

名稱

地址

電話號碼

11. 商號、公司或法團資產 (請列出)

財產、裝置及設備		\$
庫存資產		\$
商譽及其他無形資產		\$
貸款及應收款項		\$
銀行結餘及現金		\$
其他		\$
	總額	\$

12. 商號、公司或 法團負債 (請列出)

營業應繳款項		\$
應繳稅項		\$
其他應繳款項		\$
銀行貸款		\$
其他借款		\$
其他		\$
	總額	\$

13. 將商號、公司或法團最近期的經審計的損益表及資產負債表副本夾附於本表格

14. 聲明 本人_____聲明：盡本人所知，本人在以上各段及在附頁
(如有的話)中提供的詳細資料，均屬事實

本人謹憑藉《宣誓及聲明條例》(第 11 章)衷誠作出此項鄭重聲明，並確信其為
真確無訛

簽署

職銜或所擔任的
職位
(如代表商號、
公司或法團簽署)

連同公司圖章
(如適用的話)

此項聲明是於 20_____年_____月_____日在香港_____作出。

在本人面前作出

[簽署及職銜，即：太平紳士/公證人/監誓員。]

附註一 根據《刑事罪行條例》(第 200 章)第 36 條，任何人明知而故意在任何成文法則授權他或規定他作出的聲明或其他文件中，作出在要項上屬虛假的陳述，即屬犯罪。

- 屬個人的被告人必須由個人親身簽署。公司的董事必須事先取得常規聆案官的許可，方可代公司簽署。
- 如原告人沒有在本表格送達他後 14 天內，將要求判決的請求送交存檔，其申索須予擋置，直至他將該請求送交存檔為止。

香港特別行政區

高等法院原訟法庭

高院擬進行的民事訴訟 2025 年第 32 號

香港特別行政區

533

BP SG INVESTMENT HOLDING LIMITED

原告人

及

CHEN SHANXUAN (陈善轩)

第一被告人

AN UNKNOWN PERSON OR PERSONS WHO HAS 第二被告人
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

AN UNKNOWN PERSON OR PERSONS WHO HAS 第三被告人
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

AN UNKNOWN PERSON OR PERSONS WHO HAS 第四被告人
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

傳訊令狀

存檔於 2025 年 3 月 18 日

 House Williams

何韋律師行

原告人之代表律師

中國香港特別行政區

中環遮打道18號歷山大廈27樓

電話: 2803 3688

傳真: 2803 3608

高等法院登記處編號: 226

檔案編號: JCHC/I.00959.00001

IN THE HIGH COURT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION
COURT OF FIRST INSTANCE
INTENDED ACTION NO. 32 OF 2025
533

BP SG INVESTMENT HOLDING LIMITED

Plaintiff

and

CHEN SHANXUAN (陈善轩)

1st Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0xc49b5e5B9DA66B9126c1a62e9761E6b2147DE3E1

2nd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0x3ac96134Fb0e42a52D33045AeE50b89790f05Ed0

3rd Defendant

AN UNKNOWN PERSON OR PERSONS WHO HAS
ACCESS TO OR OPERATES THE WALLET WITH
THE ADDRESS
0xfcC8Ad911976d752890f2140D9F4edd2c64a6e49

4th Defendant

WRIT OF SUMMONS

Filed this 18th day of March 2025

 **Howse Williams**
Howse Williams
Solicitors for the Plaintiff
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High Court Registry Box No. 226
Our Ref: JCHC/I.00959.00001