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*Attorneys for Plaintiffs iFinex Inc., BFXNA
Inc., BFXWW Inc., and Tether Limited*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

iFINEX, INC., BFXNA, INC., BFXWW, INC,
and TETHER LTD.,

Plaintiffs,

v.

WELLS FARGO & COMPANY and WELLS
FARGO BANK, N.A.,

Defendants.

No. 17 Civ. 1882

**[PROPOSED] TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION
SHOULD NOT ISSUE**

1 The Court has considered the Ex Parte Application for a Temporary Restraining Order
 2 and an Order to Show Cause Why a Preliminary Injunction Should Not Issue filed by plaintiffs
 3 iFinex Inc. (“iFinex”), BFXNA Inc. (“BFXNA”), and BFXWW Inc. (“BFXWW”) (collectively,
 4 “Bitfinex”), and Tether Limited (“Tether”) (collectively, “plaintiffs”) and the papers filed in
 5 support.

6 After considering (1) whether plaintiffs have a strong likelihood of success on the merits,
 7 (2) whether there is a possibility of irreparable injury to plaintiffs if injunctive relief is not
 8 granted, (3) whether the balance of hardships favors the plaintiffs, and (4) whether injunctive
 9 relief will advance the public interest, the Court finds that plaintiffs have a strong likelihood of
 10 success on the merits. There also is a possibility of irreparable injury to the plaintiffs if a
 11 temporary restraining order is not granted. In addition, the balance of hardships favors the
 12 plaintiffs. Issuing a temporary restraining order will advance the public interest.

13 DEFENDANTS WELLS FARGO & COMPANY and WELLS FARGO BANK, N.A.
 14 ARE HEREBY ORDERED TO SHOW CAUSE at _____ on _____, or as
 15 soon thereafter as counsel may be heard in the courtroom of the Honorable
 16 _____, located at 450 Golden Gate Ave, San Francisco, California, 94102, why
 17 defendants Wells Fargo & Company, Wells Fargo Bank, N.A., their officers, agents, servants,
 18 employees and attorneys, and those in active concert or participation with them or defendants
 19 should not be restrained and enjoined pending trial of this action from suspending, rejecting, or
 20 refusing to process wire transfers of U.S. dollars from plaintiffs’ correspondent accounts, without
 21 further order of the Court or plaintiffs’ written consent.

22 Pending hearing on the above Order to Show Cause, defendants Wells Fargo &
 23 Company, Wells Fargo Bank, N.A., their officers, agents, servants, employees and attorneys, and
 24 all those in active concert or participation with them or defendants ARE HEREBY
 25 TEMPORARILY RESTRAINED AND ENJOINED from suspending, rejecting, or refusing to
 26 process wire transfers of U.S. dollars from plaintiffs’ correspondent accounts, without further
 27 order of the Court or plaintiffs’ written consent.
 28

This Order to Show Cause and Temporary Restraining Order must be served on defendants no later than ____ days before the date set for hearing, and proof of service shall be filed no later than ____ court days before the hearing. Any papers filed by defendants in response to this Order to Show Cause must be filed and served on plaintiffs through ECF by no later than ____ a.m./p.m. on _____, 2017. Any reply papers that plaintiffs elect to file must be filed and served on defendants through ECF or before ____ a.m./ p.m. on _____, 2017.

IT IS SO ORDERED.

DATED: April 5, 2017

The Honorable _____
United States District Judge

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