

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JuratBTC Blockchain)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-779
v.)	
)	Judge Virginia M. Kendall
Anton Andreyev, et al.)	
)	
Defendants.)	
)	

**PLAINTIFF’S MOTION TO CONVERT TEMPORARY RESTRAINING ORDER TO A
PRELIMINARY INJUNCTION**

Plaintiff, The JuratBTC Blockchain (“JuratBTC” or “Plaintiff”) hereby moves this Honorable Court to enter a preliminary injunction following its temporary restraining order, previously granted on February 21, 2023 and extended on March 7, 2023. The preliminary injunction should be granted for the following reasons.

I. INTRODUCTION

Plaintiff has brought this action seeking declaratory and injunctive relief to prevent the Defendants from misusing Plaintiff’s blockchain network. In particular, Plaintiff has a legal and contractual right to prohibit users from transacting on its blockchain if they come under sanctions by the Office of Foreign Assets Control (OFAC), as the Defendants here have.

The Court previously granted a temporary restraining order (TRO) freezing the JTC cryptocurrency in Defendants’ accounts, Dkt. 9, and extended the TRO by 14 days. Dkt. 13. As explained in Plaintiff’s motion for the extension, Plaintiff served Defendants via the Notice List, which is the contractually specified means for service and summons under the blockchain’s Terms and Conditions. Dkt. 10 ¶2, ¶7. Service was effective February 21, 2023. Id.

Defendants having been properly served, Plaintiff hereby requests that the Court convert the TRO into a preliminary injunction (PI) pending a final judgment in the case.

II. STATEMENT OF FACTS

The same facts supporting issuance of the TRO also support granting a PI. The relevant facts are set out in Plaintiff's Verified Complaint, Dkt. 1, and recounted in Plaintiffs Memorandum in Support of the Temporary Restraining Order, Dkt. 3-1 at 3-7.

Briefly, Defendants are individuals and entities who have been sanctioned by the Office of Foreign Asset Control (OFAC) pursuant to Executive Orders. Verified Complaint ("Complaint") ¶¶ 2, 28-44. Upon being sanctioned, Defendants were added to OFAC's list of Specially Designated Nationals (SDN) together with the blockchain addresses they control. *Id.* Defendants are prohibited by law from transacting the cryptocurrency in the listed accounts. *Id.* Defendants' SDN-listed accounts include 331 JTC on the JuratBTC blockchain. *Id.* ¶ 26.

Unlike many other blockchains, JuratBTC will comply with orders entered by state and federal courts. *Id.* ¶¶6-9, 23-25, 64-70. In particular, JuratBTC nodes can access court orders via the PACER system and execute them autonomously so long as the orders include a Jurat ID describing the transaction that the order requires. *Id.* As a result, a preliminary injunction order entered by this Court will be effective to freeze the Defendants blockchain accounts. *Id.*

III. ARGUMENT

As this Court has previously observed, the standard for granting a TRO and the standard for granting a preliminary injunction are identical. PsyBio Therapeutics, Inc. v. Corbin, No. 20 C 3340, 2021 WL 271217, at *2 (N.D. Ill. Jan. 27, 2021) (Kendall, J.) citing Merritte v. Kessel, 561 Fed.Appx. 546, 548 (7th Cir. 2014). See also Charter Nat'l Bank & Trust v. Charter One Fin., Inc., 2001 WL 527404, at *1 (N.D. Ill. May 15, 2001) (citations omitted). Accordingly, by

virtue of this Court's entry of the TRO, it has already found that the above requirements have been satisfied.

Moreover, the equitable relief sought remains appropriate. The U.S. sanctions which justified and necessitated the entry of the TRO remain in place. Continuing to freeze the JTC in Defendants' accounts is therefore required pending a final judgment in the case.

IV. CONCLUSION

In view of the foregoing, Plaintiff respectfully requests that this Court enter the preliminary injunction.

Dated: March 9, 2023

Respectfully submitted,

/s/ Jonathan Loevy
One of Plaintiff's Attorneys

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