

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

GREGORY GREENE, individually and on behalf of all others similarly situated,

Plaintiff,

v.

MTGOX INC., a Delaware corporation, MT. GOX KK, a Japanese corporation, TIBANNE KK, a Japanese corporation, and MARK KARPELES, an individual,

Defendants.

Case No. 1:14-cv-01437

**DECLARATION OF ATTORNEY
STEVEN WOODROW IN SUPPORT
OF MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

I, Steven Woodrow, on oath declare as follows:

1. I am an attorney for Plaintiff Greene and the putative classes, am over the age of 18, and can competently testify to the matters set forth herein if called upon to do so.
2. The “Landing Page” attached as Exhibit A hereto is a true and accurate copy of the home page for www.mtgox.com prior to February 24, 2014 when Mt. Gox went offline.
3. The “Terms of Use” and “Privacy Policy” attached as Group Exhibit B hereto are true and accurate copies of such documents as they applied to Plaintiff Greene and the putative Class Members.
4. The “Support Desk Updates” attached hereto as Exhibit C is a true and accurate copy of such updates as they appeared on www.mtgox.com prior to February 24, 2014 when Mt. Gox went offline.
5. The “Business Plan MtGox 2014-2017” attached hereto as Exhibit D is a true and accurate copy of the internal crisis management document leaked during the week of February 24, 2014 that appeared on www.scribd.com/doc/209535200/Business-Plan-MtGox-2014-2017.

6. On information and belief, Mt. Gox has assets within the United States. Mt. Gox operated the exchange using computer equipment and servers located in the Commonwealth of Massachusetts (IP address 23.198.168.44). Further, Mt. Gox is incorporated under the laws of the State of Delaware, registered as a money service business with the United States Treasury's Financial Crimes Enforcement Network (entity number 31000029348132), and transacted business in Illinois and throughout the United States.

7. Since the lawsuit was filed, our law firm, Edelson PC, has received reports from putative class members indicating that they had deposited Bitcoin and/or Fiat Currency on Mt. Gox shortly before the exchange shut down.

8. On March 4, 2014, I called and left a message for Tod L. Gamlen of Baker & McKenzie LLP in Palo Alto to provide oral notice of this filing. Baker & McKenzie attorneys are representing Mt. Gox with respect to the Japanese bankruptcy, as well as in litigation styled *Coinlab Inc. v. Mt. Gox KK et al.*, Case No. 2:13-cv-00777-MJP (WD Wash.) My office also mailed a copy of the Motion to Mt. Gox's below address in Japan:

Mark Karpeles
MtGox Co., Ltd.
Shibuya 2-11-5
Shibuya-ku, Tokyo

Further affiant sayeth not.

Executed this 4th day of March, 2014, in Denver Colorado.

/s/ Steven L. Woodrow
Steven L. Woodrow

CERTIFICATE OF SERVICE

I, Steven L. Woodrow, an attorney, hereby certify that I served the above and foregoing ***Declaration of Attorney Steven L. Woodrow in Support of Motion for Temporary Restraining Order and Preliminary Injunction***, by causing true and accurate copies of such paper to be transmitted to all counsel of record via the Court's CM/ECF electronic filing system on March 4, 2014.

s/ Steven L. Woodrow

Steven L. Woodrow