

John T. Jasnoch (*pro hac vice*)
jjasnoch@scott-scott.com
SCOTT+SCOTT ATTORNEYS AT LAW LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: 619-233-4565
Facsimile: 619-233-0508

Lead Counsel for Plaintiffs

(Additional Counsel on Signature Page)

UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

MARK COMBS, VLAD IACOB, and
BENJAMIN NORTHEY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

SAFEMOON LLC, SAFEMOON US, LLC,
SAFEMOON CONNECT, LLC, TANO LLC,
SAFEMOON LTD, SAFEMOON
PROTOCOL LTD, SAFEMOON MEDIA
GROUP LTD, BRADEN JOHN KARONY,
JACK HAINES-DAVIES, HENRY “HANK”
WYATT, JAKE PAUL, KYLE NAGY,
DeANDRE CORTEZ WAY, BEN
PHILLIPS, MILES PARKS McCOLLUM,
THOMAS SMITH and DANIEL M. KEEM,

Defendants.

**DECLARATION OF JOHN T.
JASNOCH IN SUPPORT OF LEAD
PLAINTIFFS’ SECOND MOTION FOR
PRELIMINARY APPROVAL OF
PROPOSED CLASS ACTION
SETTLEMENT**

Case No. 2:22-cv-00642-DBB-JCB

Assigned Judge: Hon. David Barlow
Referred Magistrate Judge: Jared C. Bennett

I, John T. Jasnoch, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am an attorney admitted *pro hac vice* in the above-captioned matter. I am an attorney with the law firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott”). I have personal knowledge of the matters stated herein and if called upon, I could, and would, competently testify thereto.

2. Mark Combs, Vlad Iacob, and Benjamin Northey (“Lead Plaintiffs”) have been appointed as Lead Plaintiffs and Scott+Scott has been appointed Lead Counsel in this case.

3. I make this declaration in support of Lead Plaintiffs’ Motion for Preliminary Approval of Proposed Class Action Settlement.

4. Attached are true and correct copies of the following Exhibits:

Exhibit A: Stipulation and Agreement of Settlement and Release;

Exhibit B: SafeMoon (SFM) Information Page, printed from

<https://bsctrace.com/token/0x42981d0bfbaf196529376ee702f2a9eb9092fcb5>
on April 3, 2026. BSCTrace.com is a blockchain explorer and analytics
platform for BNB Smart Chain blockchain.

Exhibit C: Printout of highest-numbered claims in the SafeMoon US LLC

Chapter 7 Claims page operated by Stretto, Inc. printed from

<https://cases.stretto.com/safemoon/claims/#search> on April 3, 2026.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on April 3, 2026 at San Diego, California.

/s/ John T. Jasnoch

Lead Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF on April 3, 2026, on all counsel or parties of record. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ John T. Jasnoch