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Lead Counsel for Plaintiffs

(Additional Counsel on Signature Page)

THE 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’ 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 1: Stipulation and Agreement of Settlement and Release;

Exhibit 2: Motion to Chapter 7 Trustee, Pursuant to Section 105 of the Bankruptcy Code and Bankruptcy Rules 9019 and 7023, to: (I) Approve the Settlement Agreement Between the Trustee and Lead Plaintiffs in the Securities Class Action, and (II) Grant Related Relief (ECF No. 302, *In re Safemoon US LLC*, Case No. 23-25749 (Bankr. D. Utah));

Exhibit 3: Reply of Lead Plaintiffs to Objection by Braden John Karony, Ronin Real Estate Holdings, LC., Ronin Energy Group, LC and Ronin Crypto Group LC, (ECF No. 332, *In re Safemoon US LLC*, Case No. 23-25749 (Bankr. D. Utah));

Exhibit 4: Reply of Chapter 7 Trustee to Objection of Braden John Karony, Ronin Real Estate Holdings, LC., Ronin Energy Group, LC and Ronin Crypto Group LC to Trustee’s Motion to: (I) Approve the Settlement Agreement

Between the Trustee and Lead Plaintiffs in the Securities Class Action, and (II) Grant Related Relief, (ECF No. 335, *In re Safemoon US LLC*, Case No. 23-25749 (Bankr. D. Utah)); and

Exhibit 5: Order Continuing Hearing on Motion of Chapter 7 Trustee, Pursuant to Section 105 of the Bankruptcy Code and Bankruptcy Rules 9019 and 7023, to: (I) Approve the Settlement Agreement Between the Trustee and Lead Plaintiffs in the Securities Class Action, and (II) Grant Related Relief, (ECF No. 350, *In re Safemoon US LLC*, Case No. 23-25749 (Bankr. D. Utah)).

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 January 15, 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 January 15, 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