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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

E.B., individually and on behalf of all others
similarly situated,

Plaintiff,

v.

KIMI CRUSH LIMITED, a California
corporation, ANT HIVE CREATIONS, INC., a
California corporation, PRINSLOO GLOBAL
GROUP, INC., a New York corporation,
JOYBOX STUDIO LIMITED, a Nevada
corporation, and STARFISH TECHNOLOGY
LIMITED, a Nevada corporation,

Defendants.

Case No.

COMPLAINT—CLASS ACTION

JURY DEMAND

Plaintiff E.B. brings this case, individually and on behalf of all others similarly situated, against Defendants Kimi Crush Limited (“Kimi Crush”), Ant Hive Creations, Inc. (“Ant Hive”), Prinsloo Global Group, Inc. (“Prinsloo”), JoyBox Studio Limited (“JoyBox”), and Starfish Technology Limited (“Starfish”) (collectively, “Defendants”) to enjoin their operation of illegal online casino games and for disgorgement and damages resulting from their unlawful conduct. Plaintiff E.B. alleges as follows upon personal knowledge as to herself and her own acts and experiences, and upon information and belief, including investigation conducted by her attorneys, as to all other matters.

NATURE OF THE ACTION

1
2 1. This action arises from a predatory scheme orchestrated by Defendants through
3 various illegal online casino apps, including Bingo Royal and Solitaire Master. Defendants lure
4 consumers by falsely marketing their apps as innocuous, “skill-based” bingo and solitaire games,
5 when in reality they function as unregulated online casinos where users are encouraged to
6 wager—and lose—real money on virtual slot machines and other casino-style games of chance.

7 2. To obscure their operations, Defendants regularly rebrand their gambling apps
8 under new names and new app-store publisher identities. But the apps themselves did not
9 change—each retained the same unique Apple App Store identification number, which remains
10 constant even when an app’s name or listed publisher is changed. For example, “Bingo Royal”
11 (App ID 6478530492), previously distributed under the publisher identity “Prinsloo Game
12 Studio,” is now listed as “Bingo Wealth” with Kimi Crush Limited as the app-store publisher.
13 “Solitaire Riches: Win Cash” (App ID 6479977081) appears in the app store as being distributed
14 by the developer Kimi Crush, but it was previously listed as “Solitaire Duels” with JoyBox
15 Studio Limited as the app-store publisher, and Prinsloo as the copyright holder. “Solitaire Trials”
16 (App ID 6471232743) is currently listed as published by Ant Hive Creations, Inc. as the app-
17 store publisher. Before that, it was distributed under the publisher identity JoyBox Studio
18 Limited as “Solitaire Master.”

19 3. Virtual gambling is highly addictive and strictly regulated in Washington. By law,
20 gambling activities may only be offered by licensed operators subject to the oversight and
21 control of the Washington State Gambling Commission. All forms of online gambling are
22 expressly prohibited in Washington. *See* RCW § 9.46.240(1) (“Whoever knowingly transmits or
23 receives gambling information by . . . the internet, a telecommunications transmission system, or
24 similar means . . . shall be guilty of a class C felony”).

25 4. By enabling Washington residents to wager real money on games of chance over
26 the internet and cash out their winnings, Defendants operate unlicensed and illegal online casinos
27 in direct violation of Washington law. And without any oversight or accountability, Defendants

1 flout Washington’s gambling regulations by, for example, failing to provide gambling addiction
2 resources and safeguards for Washington consumers (WAC 230-06-068), refusing to honor self-
3 exclusion requests (RCW § 9.46.071), and ignoring the required fair play standards, consumer
4 protections, and fraud-prevention measures (RCW § 9.46.010).

5 5. Defendants’ misconduct inflicts severe harm on vulnerable populations,
6 especially individuals suffering from gambling addiction. Defendants aggressively market their
7 apps through app stores and social media channels, using deceptive tactics to lure users into what
8 appear to be innocuous games. By disguising illegal online casinos as casual, “skill-based”
9 gaming apps, Defendants create exactly the kind of unchecked gambling that Washington’s strict
10 anti-gambling laws were designed to prevent. This deliberate deception inflicts financial ruin,
11 psychological distress, and compulsive gambling addiction on unsuspecting Washington
12 consumers.

13 6. Accordingly, Plaintiff E.B., on behalf of herself and other similarly situated
14 individuals, brings this lawsuit to expose Defendants’ predatory practices, recover funds lost by
15 their victims, and dismantle their deceptive and unregulated gambling operations.

16 **PARTIES**

17 7. Plaintiff E.B. is a natural person and a citizen of the State of Washington.

18 8. Defendant Kimi Crush Limited is a corporation organized and existing under the
19 laws of the State of California, with its principal place of business listed as 3739 Balboa St.,
20 Suite 1163, San Francisco, California, 94121. Defendant Kimi Crush conducts business
21 throughout this District, the State of Washington, and the United States.

22 9. Defendant Ant Hive Creations, Inc. is a corporation organized and existing under
23 the laws of the State of California, with its principal place of business listed as 385 S. Lemon
24 Ave., Suite E276, Walnut, California, 91789. Defendant Ant Hive conducts business throughout
25 this District, the State of Washington, and the United States.

26 10. Defendant JoyBox Studio Limited is a corporation organized and existing under
27 the laws of the State of Nevada, with its principal place of business listed as 1050 E. Flamingo

1 Rd., Suite 107, Mailbox No. 1319, Las Vegas, Nevada, 89119. Defendant JoyBox conducts
2 business throughout this District, the State of Washington, and the United States.

3 11. Defendant Prinsloo Global Group, Inc. is a corporation organized and existing
4 under the laws of the State of New York, with its principal place of business listed as 2131
5 Ocean Ave., Apt. 5B, Brooklyn, New York, 11229. Defendant Prinsloo conducts business
6 throughout this District, the State of Washington, and the United States.

7 12. Defendant Starfish Technology Limited is a corporation organized and existing
8 under the laws of the State of Nevada, with its principal place of business listed as 2605 S
9 Decatur Blvd, Suite 123, Mailbox No. 426, Las Vegas, Nevada, 89102. Defendant Starfish
10 conducts business throughout this District, the State of Washington, and the United States.

11 **JURISDICTION AND VENUE**

12 13. Federal subject-matter jurisdiction exists under 28 U.S.C. § 1332(d)(2) because
13 (a) at least one member of the class is a citizen of a state different from Defendants, (b) the
14 amount in controversy exceeds \$5,000,000, exclusive of interests and costs, and (c) none of the
15 exceptions under that subsection applies to this action.

16 14. The Court has personal jurisdiction over Defendants because they conduct
17 substantial, continuous, and systematic business in this District—including by entering into
18 contracts with Washington residents and engaging in ongoing economic relationships with them.
19 Furthermore, Defendants purposefully directed their activities to the District by providing
20 services to the residents of this District that it knew would be used within this District,
21 advertising its services in Washington, and actually profiting from the resulting gambling taking
22 place in Washington.

23 15. Venue is proper in this District under 28 U.S.C. § 1391(b) because a substantial
24 part of the events giving rise to Plaintiff’s claims occurred in this District.

25 **FACTUAL ALLEGATIONS**

26 ***Washington Gambling Law***

27 16. The Washington Legislature declared more than 50 years ago that, “The public

1 policy of the state of Washington on gambling is to keep the criminal element out of gambling
2 and to promote the social welfare of the people by limiting the nature and scope of gambling
3 activities and by strict regulation and control.” RCW § 9.46.010.

4 17. To achieve these policy goals, Washington law establishes a comprehensive
5 regulatory framework administered by the Washington State Gambling Commission. RCW §
6 9.46.040. All lawful gambling activities in Washington must be conducted by licensed operators
7 who comply with strict consumer protection standards, fair play requirements, problem gambling
8 programs, and ongoing regulatory oversight. RCW § 9.46.070 *et seq.*

9 18. Washington law expressly prohibits online gambling. RCW § 9.46.240 makes it a
10 Class C felony for any person to “knowingly transmit[] or receive[] gambling information by
11 telephone . . . the internet, a telecommunications transmission system, or similar means[.]” RCW
12 § 9.46.240(1). This prohibition extends to anyone who “knowingly installs or maintains
13 equipment for the transmission or receipt of gambling information[.]” *Id.*

14 19. The statute defines “gambling” broadly to include “staking or risking something
15 of value upon the outcome of a contest of chance or a future contingent event not under the
16 person’s control or influence[.]” RCW § 9.46.0237. A “thing of value” includes “any money or
17 property, any token, object or article exchangeable for money or property, or any form of credit or
18 promise, directly or indirectly, contemplating transfer of money or property or of any interest
19 therein, or involving extension of a service, entertainment or a privilege of playing at a game or
20 scheme without charge.” RCW § 9.46.0285.

21 20. Licensed gambling operators in Washington are required to provide problem
22 gambling resources and self-exclusion programs for individuals suffering from gambling
23 addiction. RCW § 9.46.071. These protections are critical safeguards designed to protect
24 vulnerable consumers from the harms of compulsive gambling.

25 21. Washington law provides a private right of action for persons who lose money
26 from illegal gambling. Under RCW § 4.24.070, “[a]ll persons losing money or anything of value
27 at or on any illegal gambling games shall have a cause of action to recover from the dealer or

1 player winning, or from the proprietor for whose benefit such game was played or dealt, or such
2 money or things of value won, the amount of the money or the value of the thing so lost.”

3 22. Defendants’ online casino operations plainly violate Washington law. As detailed
4 below, Defendants operate unregulated and unlicensed online casinos that lure Washington
5 residents to gamble real money over the internet without any oversight or consumer protections.

6 ***The Online Casino Defendants and Their Corporate Shells***

7 23. Defendants operate as an integrated enterprise to conduct illegal online gambling
8 operations in Washington and throughout the United States. Despite operating through multiple
9 corporate entities with frequently changing names and publisher identities, the gambling
10 operations themselves remain constant.

11 24. Prinsloo operated illegal online casino games that were distributed through the
12 Apple App Store under the publisher identity “Prinsloo Game Studio.” These apps included
13 “Bingo Royal,” “Solitaire Duels,” “Bubble Fever,” and similar gambling titles marketed as skill-
14 based games.

15 25. Starfish served as both a payment processor and operator for Prinsloo’s gambling
16 apps. At one point, Starfish’s own website stated:

17 Welcome to Starfish Technology Limited (referred to as ‘Starfish,’ ‘we,’ ‘us,’ or
18 ‘our’). The game is developed by Prinsloo Global Group Inc. (the ‘Developer’),
19 and we are authorized to operate and publish the game. You acknowledge and agree
20 that we are the distribution service provider approved by the developer and are
21 responsible for the operation, user support, and commercial services of this game.

22 26. JoyBox also operated as a publisher identity for Defendants’ gambling apps,
23 including “Solitaire Master.”

24 27. Kimi Crush and Ant Hive were both formed in California in late November 2024
25 and immediately took over as the App Store publisher identities for Defendants’ existing
26 gambling apps. Both entities use mailbox service addresses, list a single officer in their public
27 corporate registrations, and serve no apparent business purpose other than to act as new publisher
identities for the same illegal gambling operations previously conducted under the “Prinsloo
Game Studio” and “JoyBox Studio Limited” names.

1 28. The evidence of continuity between the old and new publisher identities is
2 overwhelming. The gambling apps themselves never changed—only the names and App Store
3 publisher identities changed. Each app retains its unique Apple App Store identification number,
4 which remains constant regardless of name or publisher changes:



5 (a) **Bingo Royal** → **Bingo Wealth**: Apple App ID 6478530492 was originally
6 associated with “Bingo Royal” published by “Prinsloo Game Studio” and
7 is now associated with “Bingo Wealth” published by Kimi Crush Limited.
8 It is the same app.

9 (b) **Solitaire Master** → **Solitaire Trials**: Apple App ID 6471232743 was
10 originally associated with “Solitaire Master” published by JoyBox Studio
11 Limited, then associated with “Solitaire Trials,” published by Ant Hive
12 Creations, Inc. It is the same app.

13 (c) **Fortune Bubble** → **Bubble Glint**: Apple App ID 6478530320 was
14 originally associated with “Fortune Bubble by Prinsloo Game Studio” and
15 is now associated with “Bubble Glint” published by Kimi Crush Limited. It
16 is the same app.

17 (d) **Bubble Fever** → **Bubble Gold**: Apple App ID 6504378464 was originally
18 associated with “Bubble Fever: Win Real Cash by Prinsloo Game Studio”
19 and is now associated with “Bubble Gold” published by Kimi Crush
20 Limited. It is the same app.

21 (e) **Solitaire Duels** → **Solitaire Riches: Win Cash**: Apple App ID
22 6479977081 was originally associated with “Solitaire Duels” published by
23 JoyBox Studio Limited, and is now associated with “Solitaire Riches: Win
24 Cash” published by Kimi Crush Limited, with Prinsloo holding the
25 copyright. It is the same app.

26 29. The nature of Defendants’ corporate shell game is evident from their own public
27 statements. As shown below in Figure 1, Kimi Crush’s Facebook page initially stated, “ 
Welcome to Prinsloo Games!  We’re the creators behind Fortune Bubble, Bingo Royal,
Solitaire Duels, Fortune Slot, Bubble Fever, 8 Ball Cash, and Bubble Peak!”:



(Figure 1, Kimi Crush Facebook Page)

30. In this way, Kimi Crush explicitly identified itself as “Prinsloo Games” and claimed credit for the same gambling apps previously operated under the Prinsloo name. Though Kimi Crush later removed this language on its Facebook page, the initial admission reveals what Defendants sought to obscure: Kimi Crush is simply Prinsloo operating under a new corporate identity.

31. This continuity is also reflected in Defendants’ App Store disclosures. As shown below in Figure 2, the Apple App Store information card for Bingo Wealth lists Kimi Crush Limited as the publisher but still credits “© Prinsloo Global Group” in the copyright line:

Information		
Seller KIMI CRUSH LIMITED	Size 165.4 MB	Category Casual
Compatibility Requires iOS 15.0 or later. ▾	Languages English and 2 more ▾	Age Rating 18+ ▾
In-App Purchases Yes ▾	Copyright © Prinsloo Global Group	

(Figure 2, Bingo Wealth App Store Information Card)

32. Together, Kimi Crush’s public “Prinsloo Games” admission and the continuing “© Prinsloo Global Group” App Store copyright line show that Defendants’ rebranding did not involve a transfer to a new business. It was a name-change and publisher-account swap designed to conceal the continuity of the same gambling operation.

1 33. The integrated nature of Defendants’ operations is confirmed by their own
2 admissions. On November 12, 2025, Plaintiff E.B. contacted JoyBox’s customer service
3 department through Facebook Messenger and asked whether Prinsloo and JoyBox were the same
4 company. A JoyBox customer service representative responded, “Hi there, the game products
5 owned by these two companies are different, but they are all ours.” When E.B. asked if the games
6 are owned by JoyBox or Prinsloo, the representative stated, “We are one company, but two
7 different departments.” This admission directly confirms that JoyBox and Prinsloo are not
8 separate businesses but rather part of a single integrated gambling operation using multiple
9 corporate identities.

10 ***Defendants Lure Consumers by Marketing Their Gambling Apps as Harmless Games***

11 34. Defendants’ illegal gambling apps are marketed as casual, skill-based games
12 available for free download on the Apple App Store. The apps present themselves as innocent
13 bingo, solitaire, and bubble-popping games where players can compete for prizes. The apps are
14 not advertised as casino-style games.

15 35. Consumers who download and play Defendants’ apps for the first time are largely
16 unaware that the apps will unlock access to illegal casino gambling. Once a user meets certain
17 thresholds—by spending a certain amount of money on the tournament-style bingo, solitaire, and
18 bubble-popping games—the apps “unlock” to reveal slot machines and plinko games where
19 actual gambling occurs.

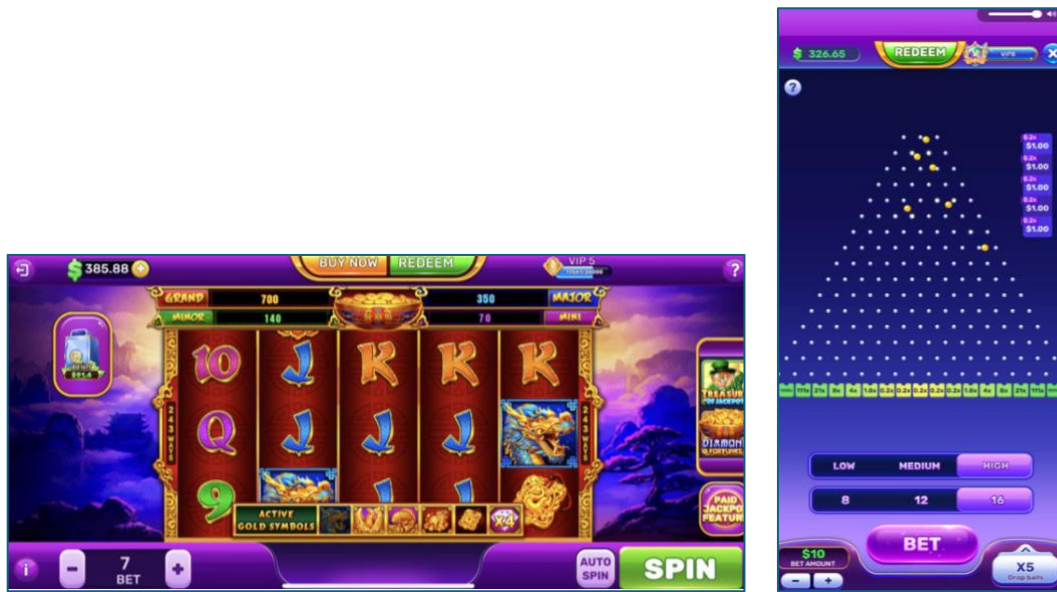
20 36. Defendants further conceal the true nature of this “unlocking” through the app’s
21 “VIP Center,” which frames higher-VIP access as a benign progression mechanic in which
22 additional “games” will “UNLOCK.” The VIP Center displays game titles and icons—such as
23 “Panda Gold” and “Eureka Blast”—without disclosing that these “games” are casino-style
24 gambling games that require real-money wagering, as shown in Figure 3, below:



(Figure 3, Screenshot of Bingo Royal VIP Center)

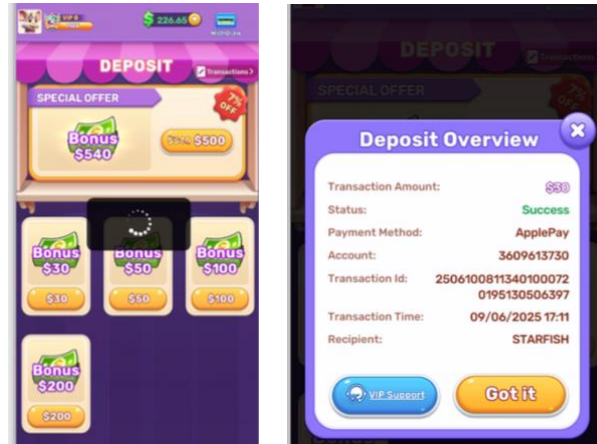
37. For the avoidance of doubt, this Complaint does not challenge the legality of Defendants’ tournament-style bingo, solitaire, or bubble-popping games standing alone. Rather, Plaintiff challenges Defendants’ use of those advertised tournament-style games as the on-ramp to a concealed “unlocking” scheme that reveals and promotes actual casino-style gambling—like slots and plinko—where users wager (and lose) real money. It is these unlocked casino-style games of chance that violate Washington law, as described herein.

38. Defendants’ slot machines and plinko games are functionally identical to those found in physical casinos, featuring the same visual and audio elements designed to encourage continued gambling. Screenshots from Bingo Royal, shown in Figure 4 below, demonstrate that its games closely resemble traditional casino slot machines and plinko boards:



(Figure 4, Screenshots from Bingo Royal)

39. Users wager real money on these casino games. Users can quickly and easily add money to their accounts using Apple Pay or their credit cards, as shown in Figure 5, below.



(Figure 5, Screenshots of Bingo Royal Deposit Process)

40. Users can wager substantial sums on these games. Depending on VIP level and game, the apps permit wagers of hundreds of dollars per spin or turn. Upon reaching the highest VIP levels, users are permitted to place wagers of \$500 or more per spin or turn.

41. The slot machines and plinko games operate entirely through chance, with no element of skill affecting outcomes. After a user initiates a spin or play, the user’s device transmits wager and gameplay information to Defendants’ servers, which execute algorithms that

1 determine the outcome. No subsequent action by the user affects the result—the outcomes are
2 based entirely on chance.

3 42. Defendants maintain detailed records of each user’s account balance, wagers,
4 wins, and losses. Users can continue playing with their winnings or exit the app and return later,
5 with their account balances and records preserved by Defendants.

6 43. Defendants operate without any of the consumer protections, fair play standards,
7 or regulatory oversight required for legal gambling operations in Washington. They provide no
8 meaningful responsible gaming resources, refuse to honor self-exclusion requests from problem
9 gamblers, and operate entirely outside the jurisdiction of the Washington State Gambling
10 Commission.

11 **FACTS SPECIFIC TO PLAINTIFF E.B.**

12 44. In 2024, Plaintiff E.B. downloaded Defendants’ games, including Bingo Royal
13 and Solitaire Master, from the Apple App Store, unaware that they would unlock and provide
14 access to online casino games—like slot machines and plinko—involving real-money wagering.
15 Plaintiff would not have downloaded or spent money in them had she known they were designed
16 to unlock casino-style gambling.

17 45. Plaintiff E.B. began playing Bingo Royal and other games operated by
18 Defendants on her Apple device and ultimately reached VIP Level 8. Over the course of her
19 play, Plaintiff made hundreds of deposits of real money into Defendants’ apps and wagered—
20 and lost—that money on Defendants’ casino-style games.

21 46. Since she began playing Defendants’ games in 2024, Plaintiff E.B. has wagered
22 and lost (and Defendants have therefore won) hundreds of thousands of dollars on Defendants’
23 games of chance.

24 47. Plaintiff contacted Defendants’ customer service and requested refunds, but
25 Defendants refused to refund her losses.

26 48. Plaintiff notified Defendants that she suffers from a gambling addiction and
27 requested that Defendants terminate her access to the apps. Defendants responded that they

1 would not honor her self-exclusion request unless Plaintiff provided a letter from a medical
2 professional corroborating her condition. Plaintiff provided a letter from her therapist.
3 Nonetheless, Defendants refused to exclude Plaintiff or terminate her access, and instead sent her
4 bonus incentives intended to induce her to return and continue gambling, causing her to wager
5 and lose additional money.

6 49. In light of her gambling addiction diagnosis and the significant risks of
7 reputational and professional harm that Plaintiff faces if she uses her full name, she seeks to
8 proceed pseudonymously at this stage.

9 **CLASS ALLEGATIONS**

10 50. **Class Definition:** Plaintiff E.B. brings this action pursuant to Fed. R. Civ. P.
11 23(b)(2) and (b)(3) on behalf of herself and a Class of similarly situated individuals, defined as
12 follows:

13 All persons in the State of Washington who lost money wagering at Defendants'
14 online casino-style games.

15 The following people are excluded from the Class: (1) any Judge or Magistrate presiding over
16 this action and members of their families; (2) Defendants, Defendants' subsidiaries, parents,
17 successors, predecessors, and any entity in which the Defendants or their parents have a
18 controlling interest and its current or former employees, officers and directors; (3) persons who
19 properly execute and file a timely request for exclusion from the Class; (4) persons whose claims
20 in this matter have been finally adjudicated on the merits or otherwise released; (5) Plaintiff's
21 counsel and any of Defendants' counsel; and (6) the legal representatives, successors, and
22 assigns of any such excluded persons.

23 51. **Numerosity:** On information and belief, tens of thousands of consumers fall into
24 the definition of the Class. Members of the Class can be identified through Defendants' records,
25 discovery, and other third-party sources.

26 52. **Commonality and Predominance:** There are many questions of law and fact
27 common to Plaintiff's and the Class's claims, and those questions predominate over any

1 questions that may affect individual members of the Class. Common questions for the Class
2 include, but are not necessarily limited to the following:

- 3 (a) Whether Defendants’ online casino games are “gambling” as defined by RCW §
4 9.46.0237;
- 5 (b) Whether Defendants are the proprietors for whose benefit the online casino games
6 are played or whether Defendants operate the casino;
- 7 (c) Whether Plaintiff and each member of the Class lost money or anything of value
8 by gambling;
- 9 (d) Whether Defendants misrepresented their apps as “skill-based” games rather than
10 casino-style gambling;
- 11 (e) Whether Defendants violated the Washington Consumer Protection Act, RCW §
12 19.86.010, *et seq.*;
- 13 (f) Whether Starfish, as a payment processor, is an operator under Washington law;
14 and
- 15 (g) Whether Defendants have been unjustly enriched as a result of their conduct.

16 53. **Typicality:** Plaintiff’s claims are typical of the claims of other members of the
17 Class in that Plaintiff’s and the members of the Class sustained damages arising out of
18 Defendants’ wrongful conduct.

19 54. **Adequate Representation:** Plaintiff will fairly and adequately represent and
20 protect the interests of the Class and has retained counsel competent and experienced in complex
21 litigation and class actions. Plaintiff’s claims are representative of the claims of the other
22 members of the Class, as Plaintiff and each member of the Class lost money playing Defendants’
23 games of chance. Plaintiff also has no interests antagonistic to those of the Class, and Defendants
24 have no defenses unique to Plaintiff. Plaintiff and her counsel are committed to vigorously
25 prosecuting this action on behalf of the Class and have the financial resources to do so. Neither
26 Plaintiff nor her counsel have any interest adverse to the Class.

1 **55. Policies Generally Applicable to the Class:** This class action is appropriate for
2 certification because Defendants have acted or refused to act on grounds generally applicable to
3 the Class as a whole, thereby requiring the Court’s imposition of uniform relief to ensure
4 compatible standards of conduct toward the members of the Class and making final injunctive
5 relief appropriate with respect to the Class as a whole. Defendants’ policies that Plaintiff
6 challenges apply and affect members of the Class uniformly, and Plaintiff’s challenge of these
7 policies hinges on Defendants’ conduct with respect to the Class as a whole, not on facts or law
8 applicable only to Plaintiff. The factual and legal bases of Defendants’ liability to Plaintiff and to
9 the other members of the Class are the same.

10 **56. Superiority:** This case is also appropriate for certification because class
11 proceedings are superior to all other available methods for the fair and efficient adjudication of
12 this controversy. The harm suffered by the individual members of the Class is likely to have been
13 relatively small compared to the burden and expense of prosecuting individual actions to redress
14 Defendant’s wrongful conduct. Absent a class action, it would be difficult if not impossible for
15 the individual members of the Class to obtain effective relief from Defendants. Even if members
16 of the Class themselves could sustain such individual litigation, it would not be preferable to a
17 class action because individual litigation would increase the delay and expense to all parties and
18 the Court and require duplicative consideration of the legal and factual issues presented. By
19 contrast, a class action presents far fewer management difficulties and provides the benefits of
20 single adjudication, economy of scale, and comprehensive supervision by a single Court.
21 Economies of time, effort, and expense will be fostered and uniformity of decisions will be
22 ensured.

23 **57.** Plaintiff reserves the right to revise the foregoing “Class Allegations” and “Class
24 Definition” based on facts learned through additional investigation and in discovery.
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FIRST CAUSE OF ACTION
Violation of Revised Code of Washington § 4.24.070
(On behalf of Plaintiff and the Class)

1
2 58. Plaintiff incorporates by reference the foregoing allegations as if fully set forth
3 herein.

4 59. Plaintiff, members of the Class, and Defendants are all “persons” as defined by
5 RCW § 9.46.0289.

6 60. The state of Washington’s “Recovery of money lost at gambling” statute, RCW §
7 4.24.070, provides that “[a]ll persons losing money or anything of value at or on any illegal
8 gambling games shall have a cause of action to recover from the dealer or player winning, or
9 from the proprietor for whose benefit such game was played or dealt, or such money or things of
10 value won, the amount of the money or the value of the thing so lost.”

11 61. “Gambling,” defined by RCW § 9.46.0237, “means staking or risking something
12 of value upon the outcome of a contest of chance or a future contingent event not under the
13 person’s control or influence[.]”

14 62. RCW § 9.46.0285 states that a “‘Thing of value,’ as used in this chapter, means
15 any money or property, any token, object or article exchangeable for money or property, or any
16 form of credit or promise, directly or indirectly, contemplating transfer of money or property or
17 of any interest therein, or involving extension of a service, entertainment or a privilege of
18 playing at a game or scheme without charge.” The real money that Plaintiff and the Class
19 wagered on Defendants’ online casino games is thus a “thing[] of value” under RCW §
20 9.46.0285.

21 63. Defendants’ online casino games are “Contest[s] of chance,” as defined by RCW
22 § 9.46.0225, because they are “contest[s], game[s], gaming scheme[s], or gaming device[s] in
23 which the outcome[s] depend[] in a material degree upon an element of chance, notwithstanding
24 that skill of the contestants may also be a factor therein.” Defendants’ games are programmed to
25 have outcomes that are determined entirely upon chance—a contestant’s skill (or lack thereof)
26 does not affect the outcomes.

1 64. RCW § 9.46.0201 defines “Amusement game[s]” as games where “The outcome
2 depends in a material degree upon the skill of the contestant[,]” amongst other requirements.
3 Defendants’ online casino games are not “Amusement game[s]” because their outcomes are
4 dependent entirely upon chance and not upon the skill of the player and because the games are
5 “contest[s] of chance,” as defined by RCW § 9.46.0225.

6 65. Defendants’ online casino games are not “pinball machine[s] or similar
7 mechanical amusement device[s]” as contemplated by RCW § 9.46.0241 because:

- 8 (a) the games are electronic rather than mechanical;
- 9 (b) the games confer replays but those replays are recorded and can be redeemed
10 on separate occasions (*i.e.*, they are not “immediate and unrecorded”); and
- 11 (c) the games contain electronic mechanisms that vary the chance of winning free
12 games or the number of free games which may be won (*e.g.*, the games allow for
13 different wager amounts).

14 66. Defendants’ online casino games are illegal gambling games because they are
15 online games at which players wager things of value—real money—and by an element of chance
16 (*e.g.*, by spinning an online slot machine) are able to win more real money or lose the money
17 they wagered.

18 67. Defendants are operators of the casino games and are proprietors for whose
19 benefit the online gambling games are played because they own and operate the casino games for
20 their own profit.

21 68. As such, Plaintiff and the Class gambled when they used real money to wager on
22 Defendants’ casino-style games. Plaintiff and each member of the Class staked money, in the
23 form of real money, at Defendant’s games of chance (*e.g.*, Defendants’ slot machines, plinko,
24 and other games of chance) for the chance of winning additional things of value (*e.g.*, more real
25 money).

26 69. As a direct and proximate result of Defendants’ operation of their games, Plaintiff
27 E.B. and each member of the Class have lost money wagering at Defendants’ games of chance.

1 70. Accordingly, Plaintiff E.B., on behalf of herself and the Class, seeks an order (1)
2 requiring Defendants to cease the operation of their gambling games; (2) requiring Defendants to
3 honor Plaintiff’s self-exclusion request and blocking her from accessing their gambling games;
4 and (3) awarding the recovery of all lost monies, interest, and reasonable attorneys’ fees,
5 expenses, and costs to the extent allowable.

6 **SECOND CAUSE OF ACTION**
7 **Violation of the Washington Consumer Protection Act, RCW § 19.86.010, *et seq.***
8 **(On behalf of Plaintiff and the Class)**

9 71. Plaintiff incorporates by reference the foregoing allegations as if fully set forth
10 herein.

11 72. Washington’s Consumer Protection Act, RCW § 19.86.010 *et seq.* (“CPA”),
12 protects both consumers and competitors by promoting fair competition in commercial markets
13 for goods and services.

14 73. To achieve that goal, the CPA prohibits any person from using “[u]nfair methods
15 of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce .
16 . . .” RCW § 19.86.020.

17 74. The CPA states that “a claimant may establish that the act or practice is injurious
18 to the public interest because it . . . [v]iolates a statute that contains a specific legislative
19 declaration of public interest impact[.]” RCW § 19.86.093.

20 75. Defendants have violated RCW § 9.46.010, *et seq.*, because their online casino
21 games are illegal online gambling games as described above. Defendants also hide the fact that
22 their apps unlock following sufficient gameplay to reveal actual gambling through games of
23 chance.

24 76. Defendants’ wrongful conduct occurred in the conduct of trade or commerce—
25 *i.e.*, while Defendants were engaged in the operation of making computer games available to the
26 public.

27 77. Defendants’ acts and practices were and are injurious to the public interest
because Defendants, in the course of their business, continuously advertised to and solicited the

1 general public in Washington State and throughout the United States to play their unlawful
2 online casino games of chance. This was part of a pattern or generalized course of conduct on the
3 part of Defendants, and many consumers have been adversely affected by Defendants' conduct
4 and the public is at risk.

5 78. Defendants have profited from their operation of unlawful games of chance,
6 amassing potentially millions of dollars from the losers of their games of chance.

7 79. As a result of Defendants' conduct, Plaintiff and the Class members were injured
8 in their business or property—*i.e.*, economic injury—in that they lost money wagering on
9 Defendants' unlawful games of chance.

10 80. Defendants' unfair or deceptive conduct proximately caused Plaintiff's and the
11 Class members' injury because, but for the challenged conduct, Plaintiff and the Class members
12 would not have lost money wagering at or on Defendants' games of chance, and they did so as a
13 direct, foreseeable, and planned consequence of that conduct.

14 81. Accordingly, Plaintiff E.B., on behalf of herself and the Class, seeks an order (1)
15 requiring Defendants to cease the operation of their gambling games; (2) requiring Defendants to
16 honor Plaintiff's self-exclusion request and blocking her from accessing their gambling games;
17 and (3) awarding the recovery of actual damages and treble damages, together with the costs of
18 suit, including reasonable attorneys' fees.

19 **THIRD CAUSE OF ACTION**
20 **Unjust Enrichment**
21 **(On behalf of Plaintiff and the Class)**

22 82. Plaintiff incorporates by reference the foregoing allegations as if fully set forth
23 herein.

24 83. Plaintiff and the Class have conferred a benefit upon Defendants in the form of
25 the money Defendants received from them to wager at Defendants' online casino games.

26 84. Defendants appreciated and had knowledge of the benefits conferred upon them
27 by Plaintiff and the Class.

1 85. Under principles of equity and good conscience, Defendants should not be
2 permitted to retain the money obtained from Plaintiff and the members of the Class, which
3 Defendants have unjustly obtained as a result of their unlawful operation of unlawful online
4 gambling games. As it stands, Defendants have retained millions of dollars in profits generated
5 from their unlawful games of chance and should not be permitted to retain those ill-gotten
6 profits.

7 86. Accordingly, Plaintiff E.B. and the Class seek full disgorgement and restitution of
8 any money Defendants have retained as a result of the unlawful and/or wrongful conduct alleged
9 herein.

10 **PRAYER FOR RELIEF**

11 Plaintiff E.B., individually and on behalf of all others similarly situated, respectfully
12 requests that this Court enter an Order:

- 13 (a) Certifying this case as a class action on behalf of the Class defined above, appointing
14 E.B. as representative of the Class, and appointing her counsel as class counsel;
- 15 (b) Declaring that Defendants' conduct, as set out above, violates the CPA;
- 16 (c) Entering judgment against Defendants in the amount of the losses suffered by
17 Plaintiff and each member of the Class;
- 18 (d) Enjoining Defendants from continuing the challenged conduct;
- 19 (e) Awarding damages to Plaintiff and the Class members in an amount to be determined
20 at trial, including trebling as appropriate;
- 21 (f) Awarding restitution to Plaintiff and Class members in an amount to be determined at
22 trial, and requiring disgorgement of all benefits that Defendants have unjustly received;
- 23 (g) Awarding reasonable attorney's fees and expenses;
- 24 (h) Awarding pre- and post-judgment interest, to the extent allowable;
- 25 (i) Entering judgment for injunctive and/or declaratory relief as necessary to protect the
26 interests of Plaintiff and the Class; and
- 27 (j) Awarding such other and further relief as equity and justice require.

JURY DEMAND

Plaintiff requests a trial by jury of all claims that can be so tried.

Respectfully submitted,

E.B., individually and on behalf of all others
similarly situated,

Dated: March 3, 2026

By: s/ Sarah LaFreniere
Sarah LaFreniere #62621

EDELSON PC
Sarah LaFreniere (#62621)
slafreniere@edelson.com
P.O. Box 75493
Seattle, WA 98125
Tel: (206) 647-6424

EDELSON PC
Michael Ovca*
movca@edelson.com
350 North LaSalle Street, 14th Floor
Chicago, IL 60654
Tel: (312) 589-6370

**Pro hac vice* admission to be sought.

Attorneys for Plaintiff and the Putative Class

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

E.B., individually and on behalf of all others similarly

(b) County of Residence of First Listed Plaintiff Bellingham County, WA (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Edelson PC
Sarah LaFreniere
P.O. Box 75493, Seattle, WA 98125, Tel: (206) 647-6424

DEFENDANTS

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation
County of Residence of First Listed Defendant San Francisco County, CA (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PIF) and Defendant (DEF) citizenship options: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. § 1332(d)(2), RCW § 4.24.070, RCW 19.86.010, et seq.
Brief description of cause:
Violations of RCW § 4.24.070, RCW 19.86.010, et seq., and Unjust Enrichment.

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 5,000,000.00
CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY (See instructions):
JUDGE DOCKET NUMBER

DATE 03/03/2026 SIGNATURE OF ATTORNEY OF RECORD s/ Sarah LaFreniere

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

E.B., individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation,

Defendant(s)

Civil Action No. 3:26-cv-5216

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Ant Hive Creations, Inc. 385 S. Lemon Ave., Suite E276 Walnut, California 91789

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Sarah LaFreniere Edelson PC P.O. Box 75493 Seattle, WA 98125

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:26-cv-5216

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

E.B., individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation,

Defendant(s)

Civil Action No. 3:26-cv-5216

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) JoyBox Studio Limited 1050 E. Flamingo Rd., Suite 107, Mailbox No. 1319 Las Vegas, Nevada 89119

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Sarah LaFreniere Edelson PC P.O. Box 75493 Seattle, WA 98125

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:26-cv-5216

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

E.B., individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation,

Defendant(s)

Civil Action No. 3:26-cv-5216

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Kimi Crush Limited 3739 Balboa St., Suite 1163 San Francisco, California 94121

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Sarah LaFreniere Edelson PC P.O. Box 75493 Seattle, WA 98125

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:26-CV-5216

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

E.B., individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation,

Defendant(s)

Civil Action No. 3:26-cv-5216

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Prinsloo Global Group, Inc. 2131 Ocean Ave., Apt. 5B Brooklyn, New York 11229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,

whose name and address are: Sarah LaFreniere Edelson PC P.O. Box 75493 Seattle, WA 98125

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:26-cv-5216

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

E.B., individually and on behalf of all others similarly situated,

Plaintiff(s)

v.

KIMI CRUSH LIMITED, a California corporation, ANT HIVE CREATIONS, INC., a California corporation, PRINSLOO GLOBAL GROUP, INC., a New York corporation, JOYBOX STUDIO LIMITED, a Nevada corporation, and STARFISH TECHNOLOGY LIMITED, a Nevada corporation,

Defendant(s)

Civil Action No. 3:26-cv-5216

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Starfish Technology Limited 2605 S Decatur Blvd, Suite 123, Mailbox No. 426 Las Vegas, Nevada 89102

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Sarah LaFreniere Edelson PC P.O. Box 75493 Seattle, WA 98125

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 3:26-cv-5216

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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