UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. APPROXIMATELY 225,364,961 USDT, Defendant *in rem*,	Case No. 25-cv-1907

MOTION FOR ADMISSION PRO HAC VICE OF MICHAEL BURSHTEYN

Pursuant to Local Civil Rule 83.2(c) of the United States District Court for the District of Columbia, Michael A. Pusateri, on behalf of certain forthcoming third-party claimants, moves for admission and appearance of attorney Michael Burshteyn *pro hac vice* in the above-entitled action. This motion is supported by the Declaration of Michael Burshteyn filed herewith. As set forth in Mr. Burshteyn's Declaration, and as attested by the accompanying Certificate of Good Standing, he is admitted and in good standing in the State Bar of California.

This motion is supported and signed by Michael A. Pusateri, an active and sponsoring member of the Bar of this Court.

Dated: September 23, 2025

Respectfully submitted,

By: */s/ Michael A. Pusateri*

GREENBERG TRAURIG, LLP
Michael A. Pusateri (DC Bar No. 1005463)
2101 L Street, N.W., Suite 1000
Washington, D.C. 20037
Telephone: 202.533.2354
pusaterim@gtlaw.com

Attorneys for Forthcoming Third-Party Claimants

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff(s)

vs.

APPROXIMATELY 225,364,961 USDT,

Defendant(s)

Case Number: 25-cv-1907

DECLARATION FOR PRO HAC VICE ADMISSION
(to be attached to Motion for Pro Hac Vice Admission)

In accordance with LCvR 83.2 (c)(2) and LCvR 44.1 (c)(2), I hereby declare that the answers to the following questions are complete, true, and correct:

1. Full Name: Michael Burshteyn
2. State bar membership number: 295320
3. Business address, telephone and fax numbers:

   Greenberg Traurig, LLP, 101 Second St., Suite 200, San Francisco, CA 94105, 415-655-1300 / 415-707-2010 (fax)

4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:

   California

5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? Yes ☐ No ☑

6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? Yes ☐ No ☑

   (Please attach a statement explaining any "Yes" answers to questions 5 or 6.)

7. List the number of times the attorney has been admitted pro hac vice into this court within the last two years. -0-

   (If your principal office is located in the District of Columbia, please answer questions 8 and 9.)

8. Are you a member of the DC Bar?

9. Do you have a pending application for admission into USDC for the District of Columbia?

In compliance with Local Rule 83.2(b) or LCrR 44.1(b), an attorney who wishes to appear as sole or lead counsel in a contested evidentiary hearing or trial on the merits further certifies that he/she:

(CHECK ALL ITEMS THAT APPLY)

1. ☑ has previously acted as sole or lead counsel in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction in a contested jury or bench trial or other contested evidentiary hearing in which testimony was taken in open court and an order or other appealable judgment was entered. [LCvR 83.2(b)(1)/LCrR 44.1(b)(1)]; **OR**

2. ☐ has participated in a junior capacity in an entire contested jury or bench trial in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction. [LCvR 83.2(b)(2)/LCrR 44.1(b)(2)]; **OR**

3. ☐ has satisfactorily completed a continuing legal education trial advocacy course of at least 30 hours sponsored by the District of Columbia Bar or accredited by a State Bar. [LCvR 83.2(b)(3)/LCrR 44.1(b)(3)]

I declare under penalty of perjury that the foregoing is true and correct.

September 25, 2025
DATE

SIGNATURE OF ATTORNEY

Supreme Court of California

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

MICHAEL BURSHTEYN

I, JORGE E. NAVARRETE, Clerk and Executive Officer of the Supreme Court of the State of California, do hereby certify that MICHAEL BURSHTEYN, # 295320, was on the 30th day of December 2013 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 26th day of June 2025.

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

By: _____
Gabriela Muca, Deputy Clerk