UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. APPROXIMATELY 225,364,961 USDT, Defendant *in rem*.	Civil Action No. 25-cv-01907-AHA

CLAIMANT INFINIWEB TECHNOLOGY INC.'S MOTION TO DISMISS COMPLAINT FOR FORFEITURE IN REM, MOTION TO SUPPRESS, AND MOTION TO STRIKE

Claimant Infiniweb Technology Inc. ("Infiniweb"), by and through the undersigned counsel, respectfully moves pursuant to Federal Rule of Civil Procedure 12 and Rule G(8)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions for dismissal of the Complaint for Forfeiture *In Rem* because the Complaint fails to state a claim upon which relief can be granted and for lack of *in rem* jurisdiction.[1] Infiniweb moves to suppress evidence obtained by the Government through, or derived from, an illegal, warrantless seizure, and to strike from the Complaint information derived from confidential settlement communications between the Infiniweb's counsel and the Government, included in the Complaint in piecemeal form and in blatant violation of Federal Rule of Evidence 408. The exclusion of such evidence further undermines the Government's attempt to state a claim or to demonstrate a proper basis for *in rem* jurisdiction.

[1] Infiniweb understands that Claimants 1-118 intend to move this Court for a change of venue, and that the bases for that motion are likely to overlap substantially with Infiniweb's own motion regarding *in rem* jurisdiction. In the event the Court takes up the issue of venue prior to reviewing the additional bases for relief set forth herein, Infiniweb joins in Claimants 1-118's motion for change of venue and would respectfully request the opportunity to amend this motion and

A memorandum of points and authorities in support is attached.

Respectfully submitted,

By: /s/ Andrew C. Adams

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Dated: November 7, 2025

supporting memorandum to account for additional arguments that may apply under the controlling law the District Court to which this matter may be transferred.

LOCAL CIVIL RULE 7(M) STATEMENT

Pursuant to Local Civil Rule 7(m), I certify that a good-faith effort was made to discuss the applicable relief sought with the Government and with attorneys representing the Claimants identified in ECF No. 14, Schedule A, in order to determine whether there is any opposition to the applicable relief sought and to narrow any areas of disagreement. Specifically, the parties held a meet and confer on November 7, 2025. It is the undersigned counsel's understanding that the parties take the following positions with respect to the enclosed motions:

- The Government opposes each of the motions filed herewith by Claimant Infiniweb Technology Inc.
- The Claimants identified in ECF No. 14, Schedule A, take no position on these motions.

By: /s/ Andrew C. Adams
Andrew C. Adams

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2025, the foregoing motions, together with its memorandum in support and all accompanying exhibits, was filed electronically with the Clerk of Court using the CM/ECF system and served via that system on the following counsel of record:

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