UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

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

SCHEDULE A CLAIMANTS' NOTICE OF MOTION TO TRANSFER VENUE

Claimants identified in Schedule A (ECF No. 14) (the "Victim Claimants") move pursuant to 28 U.S.C. § 1404(a) and 1406(a) to transfer this action to the United States District Court for the Northern District of California.

Pursuant to L.R. 7(m), counsel for all parties met and conferred telephonically on October 21, 2025. The government stated its intent to oppose the Motion. Counsel for Infiniweb Technology Inc. ("Infiniweb"), a separate claimant based in Hong Kong, (ECF No. 23), suggested that it would consider whether not to oppose, but has not yet not seen the brief, and Victim Claimants expect Inifniweb will convey its position after reviewing this brief.

Dated: November 7, 2025

Respectfully submitted,

By: */s/ Michael Burshteyn*

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