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 FOR AN EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS AND RELATED BRIEFING SCHEDULE

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Claimant Infiniweb Technology Inc. ("Infiniweb") hereby moves for an extension of time to respond to the Government's Special Interrogatories, which were propounded on December 5, 2025 and are currently due on December 26, 2025, and of time for related responsive briefing by the Government and Claimants. Pursuant to Local Rule 7, this Motion is accompanied by a memorandum of points and authorities and a proposed order. On December 22, 2025, Infiniweb's counsel conferred with the Government and Claimants 1–118 regarding this Motion, and this Motion is unopposed. Good cause exists for extending Infiniweb's deadline to respond to the Government's Special Interrogatories to January 16, 2026, with an anticipated deadline of January 5, 2026 for the parties to file proposed confidentiality protections either by stipulation and agreement, or through opposed briefing, and a proposed order for the Court's consideration.

WHEREFORE, Infiniweb requests that this Court grant their Motion and enter the attached proposed Order.

Date: December 22, 2025

Respectfully submitted,

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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CLAIMANT INFINIWEB'S TECHNOLOGY, INC.'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS AND OF RELATED BRIEFING

The Government seeks broad discovery into confidential and sensitive information regarding Claimant Infiniweb Technology, Inc.'s ("Infiniweb") property interests and commercial operations, as well as personal information regarding Infiniweb's board members, owners, directors, executive officers, employees, and associated third parties. These requests have been propounded in the form of Special Interrogatories pursuant to Supplemental Rule G of the Federal Rules of Civil Procedure. Infiniweb has proposed a protective order governing the treatment of certain confidential information, both from Infiniweb and other parties, but is still conferring with the parties in an attempt to reach an agreement on the language for a stipulated protective order. Accordingly, Infiniweb requests that the Court extend Infiniweb's deadline to respond to the Government's interrogatories to January 16, 2026, with a deadline of January 5, 2026 for the parties to file, whether by a stipulation or competing orders and briefs, a proposed protective order for the Court's consideration.

I. FACTUAL BACKGROUND

On December 5, 2025, the Government propounded sixteen special interrogatories upon Infiniweb (the "Interrogatories"). The Interrogatories seek discovery into confidential and sensitive information regarding Infiniweb's property interests and commercial operations, as well as personal information regarding Infiniweb's employees, agents, and related third parties.

On December 17, 2025, Infiniweb's counsel contacted all parties then appearing in this action and proposed a draft confidentiality agreement and proposed order that would preserve all parties' interests in protecting any confidential and/or sensitive information that may be disclosed in connection with this matter.[1] These parties are still conferring regarding a potential stipulation, confidentiality agreement, and proposed order.

On December 22, 2025, Infiniweb conferred with the parties regarding the instant Motion for an Extension of Time. Counsel for the Government and Claimants 1–118 stated that they do not oppose this Motion.

II. ARGUMENT

A. This Court Has Broad Discretion Under Rule 6(b) to Grant an Extension of Time

Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure provides that, upon motion by a party before the original time expires, "the court may, for good cause, extend the time." Fed. R. Civ. P. 6(b)(1)(A). By this Motion, Infiniweb is seeking to extend the deadline by which it is

[1] On December 19, 2025, a new set of claimants filed a "Notice of Adoption" and a "Verified Claim," purporting to join with Claimants 1–118, already appearing by way of a verified claim to the defendant-in-rem property. To the extent this new set of claimants is properly and timely entered in this action, they are not affected by the current motion schedule which preceded their entry into the case. No counsel appears on the docket as of yet, but the certificate of service attached hereto will be sent to counsel for these new claimants as listed on their recent filings.

required to respond to the Government's special interrogatories—a deadline which has not expired nor been extended previously.

B. "Good Cause" Exists For This Court To Enter The Attached Protective Order

Infiniweb's basis for the request is founded on good cause as required by Rule 6(b). First, a protective order is appropriate both to protect highly sensitive personal, financial and commercial information, tendered both by Infiniweb and (should this action proceed beyond the current motions to dismiss and transfer) the other parties in this matter; and to protect individuals and non-parties from annoyance and potential harassment, including as to the Claimants 1–118, whose identities are not yet disclosed.

D. The Parties Will Not Be Prejudiced By The Extension

This Motion is unopposed. The proposed extension of time will not prejudice the Government or any other parties in this action.

III. CONCLUSION

Infiniweb has demonstrated "good cause" under Rule 6(b)(1) for an extension of time to respond to the Government's discovery requests, and the Order will not prejudice the parties. For these reasons, Infiniweb respectfully requests that the Court grant the instant Motion and enter the proposed Order.

Date: December 22, 2025

Respectfully submitted,

Andrew C. Adams

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[PROPOSED] ORDER

1. Claimant Infiniweb Technology, Inc.'s ("Infiniweb")'s Motion for an Extension of Time is GRANTED.

2. The parties have until January 5, 2026 to file any proposed protective order, whether by stipulation or as competing proposed orders for this Court's consideration.

3. In order to permit a protective order to be entered in this case, Infiniweb shall have until January 16, 2026 to respond to the Government's Special Interrogatories.

IT IS SO ORDERED.

Date:

_____
Amir H. Ali
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of December 2025, true and correct copies of Claimant's Motion for an Extension of Time, Memorandum of Points and Authorities in Support of Claimant's Motion for an Extension of Time, and Proposed Order were served by electronic or standard mail, upon the following:

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