EXHIBIT A

From: Dan Boyle
To: "Blaylock Jr, Rick (USADC)"; Agustin Barbara; michael.burshteyn@gtlaw.com; "pusaterim@gtlaw.com"; Rafael Yakobi
Cc: Cantor, Ethan (CRM); Rosenberg, Kevin (USADC)
Subject: RE: Special Interrogatories; Claimants 1-118; 25-cv-1907; USA v Approximately 225 Million USDT
Date: Wednesday, December 10, 2025 2:17:29 PM

Thanks Rick:

Appreciate you clarifying on the waiver point, and your agreement on the extension. Of course, we have no objection to an extension for Infiniweb as well.

Understood that we're in disagreement on the tolling question – I think your suggested course of action makes sense: you can file your position with the court noting our opposition. Then if we feel we need to update our position once we've read your filing, we'll do so promptly.

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From: Blaylock Jr, Rick (USADC) <Rick.Blaylock.Jr@usdoj.gov>
Sent: Wednesday, December 10, 2025 11:08 AM
To: Dan Boyle <dboyle@bsfllp.com>; Agustin Barbara <agustin@thecryptolawyers.com>; michael.burshteyn@gtlaw.com; 'pusaterim@gtlaw.com' <pusaterim@gtlaw.com>; Rafael Yakobi <rafael@thecryptolawyers.com>
Cc: Cantor, Ethan (CRM) <Ethan.Cantor@usdoj.gov>; Rosenberg, Kevin (USADC) <Kevin.Rosenberg@usdoj.gov>
Subject: Re: Special Interrogatories; Claimants 1-118; 25-cv-1907; USA v Approximately 225 Million USDT

Hey Dan,

We do not view responding to the special interrogatories as a waiver to the venue transfer argument.

January 31st works for us. The court requires us to file a motion, so we'll need to include Infiniweb in an email chain to get their opinion. The government is agreeable to a same extension for them.

We disagree as to whether sending special interrogatories tolls the deadline for the motion to transfer venue. Would you be opposed to all of us filing a something with the court to clarify the deadline, understanding you are opposed to our position?

Rick Blaylock
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Asset Forfeiture Coordinator
United States Attorney's Office
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From: Dan Boyle <dboyle@bsfllp.com>
Sent: Wednesday, December 10, 2025 1:37 PM
To: Blaylock Jr, Rick (USADC) <Rick.Blaylock.Jr@usdoj.gov>; Agustin Barbara <agustin@thecryptolawyers.com>; michael.burshteyn@gtlaw.com <michael.burshteyn@gtlaw.com>; 'pusaterim@gtlaw.com' <pusaterim@gtlaw.com>; Rafael Yakobi <rafael@thecryptolawyers.com>
Cc: Cantor, Ethan (CRM) <Ethan.Cantor@usdoj.gov>; Rosenberg, Kevin (USADC) <Kevin.Rosenberg@usdoj.gov>
Subject: [EXTERNAL] RE: Special Interrogatories; Claimants 1-118; 25-cv-1907; USA v Approximately 225 Million USDT

Thanks Rick- Received.

Based on Rule G, I think our responses would be due December 26th, which would pose some challenges for us with the holidays. I'd propose that we agree responses be due January 31st, which I think is reasonable with the number of victim-claimants here.

To that end, please note our position is that the service of these special interrogatories will not toll the government's response to our motion to transfer (subject to the shutdown-related extension). The plain language of Rule G(6)(c) applies to "a claimant's motion to dismiss the action under Rule G(8)(b)" – so while we would agree that service of interrogatories would toll Infiniweb's motion to dismiss, Rule G provides no basis for deferring a response to the transfer motion. And as we have stated in our filings, we believe that the motion to transfer should be addressed prior to the motion to dismiss for judicial efficiency reasons.

Relatedly, our acceptance of service is not intended as waiver of any argument regarding the motion to transfer. We do not believe that serving special interrogatories would be a basis for

denying or delaying a ruling on that motion, as they will presumably apply whether this action is heard in DDC or NDCA. If you intend to argue that our responding to your special interrogatories would be grounds for denying the transfer motion please let us know so we can raise the issue with the Court expeditiously.

Thank you,

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From: Blaylock Jr, Rick (USADC) <Rick.Blaylock.Jr@usdoj.gov>
Sent: Friday, December 5, 2025 8:01 AM
To: Dan Boyle <dboyle@bsfllp.com>; Agustin Barbara <agustin@thecryptolawyers.com>; michael.burshteyn@gtlaw.com; 'pusaterim@gtlaw.com' <pusaterim@gtlaw.com>; Rafael Yakobi <rafael@thecryptolawyers.com>
Cc: Cantor, Ethan (CRM) <Ethan.Cantor@usdoj.gov>; Rosenberg, Kevin (USADC) <Kevin.Rosenberg@usdoj.gov>
Subject: RE: Special Interrogatories; Claimants 1-118; 25-cv-1907; USA v Approximately 225 Million USDT

Understood!

Attached are the special interrogatories for each claimant.

Rick Blaylock
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From: Dan Boyle <dboyle@bsfllp.com>
Sent: Thursday, December 4, 2025 5:52 PM
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<agustin@thecryptolawyers.com>; michael.burshteyn@gtlaw.com; 'pusaterim@gtlaw.com' <pusaterim@gtlaw.com>; Rafael Yakobi <rafael@thecryptolawyers.com>
Cc: Cantor, Ethan (CRM) <Ethan.Cantor@usdoj.gov>; Rosenberg, Kevin (USADC) <Kevin.Rosenberg@usdoj.gov>
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Yes, service by email is fine- thank you.

I expect we will want an extension into some date in January considering the number of claimants we represent, but let us take a look at what you're sending over and we can discuss.

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From: Blaylock Jr, Rick (USADC) <Rick.Blaylock.Jr@usdoj.gov>
Sent: Thursday, December 4, 2025 2:49 PM
To: Agustin Barbara <agustin@thecryptolawyers.com>; michael.burshteyn@gtlaw.com; 'pusaterim@gtlaw.com' <pusaterim@gtlaw.com>; Rafael Yakobi <rafael@thecryptolawyers.com>; Dan Boyle <dboyle@bsfllp.com>
Cc: Cantor, Ethan (CRM) <Ethan.Cantor@usdoj.gov>; Rosenberg, Kevin (USADC) <Kevin.Rosenberg@usdoj.gov>
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Good evening, all.

We have special interrogatories to serve you with pursuant to Rule G(6)(a). Will you accept them via email instead of by snail mail? If not, do you have an address you want us to send them other than the addresses listed in PACER?

Also, I want to flag two other things for you. First, the D.C. courts extended deadlines to the government in civil cases due to the lapse in appropriations. That order is attached for your awareness. Second, the timeline to respond to special interrogatories is within 21 days. Rule G(6)(b). That puts the due date around Christmas. Please, don't let this take you away from celebrating. We can motion the court for an extension of time if needed. Just let us know. We will extend the same offer to Infiniweb.

Thank you!

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