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. 1:25-cv-1907-AHA

MOTION FOR ADMISSION PRO HAC VICE OF DANIEL J. THORNBURGH

Pursuant to Local Civil Rule 83.2(c) of the United States District Court for the District of Columbia, Christopher Klotz, on behalf of claimants on Exhibit A (D.E. 34-1), moves for admission and appearance of attorney Daniel J. Thornburgh *pro hac vice* in the above-entitled action. This motion is supported by the Declaration of Daniel J. Thornburgh filed herewith. As set forth in Mr. Thornburgh's Declaration, and as attested by the accompanying Certificate of Good Standing, Mr. Thornburgh is admitted and in good standing with the Florida, Minnesota and Colorado Bars. This motion is supported and signed by Christopher Klotz, an active and sponsoring member of the Bar of this Court.

Dated: January 27, 2026.

Respectfully Submitted,

By: */s/ Christopher Klotz*
Christopher Klotz
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Attorneys for Claimants Identified in Schedule A(D.E. 34-1)

CERTIFICATE OF SERVICE

I, Christopher Klotz, hereby certify that the foregoing document, filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 27, 2026.

By: */s/ Christopher Klotz*
Christopher Klotz
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