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. 25-cv-1907-AHA

MOTION TO WITHDRAW AS COUNSEL

COMES NOW undersigned counsel, pursuant to Local Civil Rule 83.6 of the Local Rules of the United States District Court for the District of Columbia and respectfully moves this Court for leave to withdraw as counsel for Claimant Nivedita Kaul.

In support thereof, undersigned counsel states as follows:

1. Undersigned counsel currently represents Claimant Nivedita Kaul in the above-captioned matter.
2. Undersigned counsel and Ms. Kaul have conferred regarding the termination of the representation and Ms. Kaul consents to this withdrawal.
3. Ms. Kaul has been advised of all currently scheduled deadlines and hearings in this matter.
4. Ms. Kaul intends to proceed pro se.
5. Ms. Kaul's current contact information is as follows:

Nivedita Kaul
5001 Ramon Road, Building 3 #1005
Palm Springs, CA 92264
Telephone: 1 (724) 413-8167
Email: nivie@digitaldefendersgroup.org

6. Withdrawal of counsel will not unduly delay these proceedings or prejudice any party.

WHEREFORE, undersigned counsel respectfully requests that the Court enter an Order permitting withdrawal as counsel for Claimant Nivedita Kaul and directing that all future filings and correspondence be served directly upon Ms. Kaul at the address listed above.

Dated: May 11, 2026

Respectfully submitted,

/s/ Tara J. Plochocki
Tara J. Plochocki (D.C. Bar No. 989404)
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Counsel for Claimant Nivedita Kaul

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of May, 2026, a copy of the foregoing Motion to Withdraw as Counsel was filed via the Court's CM/ECF system and served upon all counsel of record and upon:

Nivedita Kaul
5001 Ramon Road, Building 3 #1005
Palm Springs, CA 92264
Telephone: 1 (724) 413-8167
Email: nivie@digitaldefendersgroup.org

/s/ Tara J. Plochocki

Tara J. Plochocki