UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-cv-1907

v.

APPROXIMATELY 225,364,961 USDT,

Defendant *in rem*,

_____/

MOTION FOR ADMISSION PRO HAC VICE OF MARC FITAPELLI

Pursuant to Local Civil Rule 83.2(c) of the United States District Court for the District of Columbia, David C. Silver, on behalf of Lisa Kang, moves for admission and appearance of attorney Marc Fitapelli *pro hac vice* in the above-entitled action. This motion is supported by the Declaration of Marc Fitapelli filed herewith. As set forth in Mr. Fitapelli's Declaration, and as attested by the accompanying Certificate of Good Standing, he is admitted and in good standing in the State of New York, where his law office is located. This motion is supported and signed by David C. Silver, an active and sponsoring member of the Bar of this Court.

Dated: May 22, 2026

Respectfully submitted,

/s/ David C. Silver .

David C. Silver, Esq.
SILVER MILLER
5411 North University Drive - Suite 203
Coral Springs, FL 33067
Phone: (954) 516-6000
DSilver@SilverMillerLaw.com
Attorneys for Lisa Kang

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff(s)

vs.

APPROXIMATELY 225,364,961 USDT

Defendant(s)

Case Number: 25 cv 1907

DECLARATION FOR PRO HAC VICE ADMISSION
(to be attached to Motion for Pro Hac Vice Admission)

In accordance with LCvR 83.2 (c)(2) and LCvR 44.1 (c)(2), I hereby declare that the answers to the following questions are complete, true, and correct:

1. Full Name: Marc Daniel Fitapelli
2. State bar membership number: 4550992
3. Business address, telephone and fax numbers:
   28 Liberty Street, 30th Fl, NY, NY 212 203 9300
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:
   New York
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? Yes ☐ No ☑
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? Yes ☐ No ☑
   (Please attach a statement explaining any "Yes" answers to questions 5 or 6.)
7. List the number of times the attorney has been admitted pro hac vice into this court within the last two years. 0
   (If your principal office is located in the District of Columbia, please answer questions 8 and 9.)
8. Are you a member of the DC Bar? No
9. Do you have a pending application for admission into USDC for the District of Columbia? No

In compliance with Local Rule 83.2(b) or LCrR 44.1(b), an attorney who wishes to appear as sole or lead counsel in a contested evidentiary hearing or trial on the merits further certifies that he/she:

(CHECK ALL ITEMS THAT APPLY)

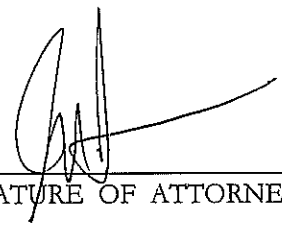
1. ☑ has previously acted as sole or lead counsel in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction in a contested jury or bench trial or other contested evidentiary hearing in which testimony was taken in open court and an order or other appealable judgment was entered. [LCvR 83.2(b)(1)/LCrR 44.1(b)(1)]; **OR**

2. ☑ has participated in a junior capacity in an entire contested jury or bench trial in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction. [LCvR 83.2(b)(2)/LCrR 44.1(b)(2)]; **OR**

3. ☐ has satisfactorily completed a continuing legal education trial advocacy course of at least 30 hours sponsored by the District of Columbia Bar or accredited by a State Bar. [LCvR 83.2(b)(3)/LCrR 44.1(b)(3)]

I declare under penalty of perjury that the foregoing is true and correct.

May 21, 2026
DATE



SIGNATURE OF ATTORNEY

Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department

I, Darrell M. Joseph, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that

Marc Daniel Fitapelli

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on ***January 30, 2008****, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

In Witness Whereof, I have hereunto set my hand in the City of Brooklyn on May 21, 2026.

Clerk of the Court

Appellate Division
Supreme Court of the State of New York
Second Judicial Department
45 Monroe Place
Brooklyn, N.Y. 11201
(718) 875-1300

HECTOR D. LASALLE
PRESIDING JUSTICE

DARRELL M. JOSEPH
CLERK OF THE COURT

KENNETH BAND
MELISSA KRAKOWSKI
DEPUTY CLERKS

WENDY STYNES
LAUREN G. DOME
BRIAN E. KENNEDY
RIAD P. WILLIAMS
ASSOCIATE DEPUTY CLERKS

CertID-00291583

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To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on the website of the Unified Court System.

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the Attorney Grievance Committee of the Second Judicial Department.

Bar examination history is available from the New York State Board of Law Examiners.

Instructions, forms and links are available on this Court's website.

Darrell M. Joseph
Clerk of the Court

Revised October 2024