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

[PROPOSED] ORDER

It is hereby

ORDERED that Plaintiff United States of America's Cross-Motion to Dismiss Claimant Infiniweb's Motion to Dismiss is DENIED; it is further

ORDERED that Infiniweb's Motion to Dismiss the Complaint for Forfeiture In Rem is GRANTED; it is further

ORDERED that the Complaint (ECF No. 1) is DISMISSED in its entirety WITH PREJUDICE; it is further

ORDERED that Infiniweb's Motion to Suppress is GRANTED; it is further

ORDERED that all evidence obtained through the "freeze" identified in Paragraph 172 of the Complaint, including the contents of the Subject Virtual Currency Addresses, all other property seized therewith, and all evidence derived therefrom, shall be SUPPRESSED; it is further

ORDERED that Infiniweb's Motion to Strike is GRANTED; and it is further

ORDERED that paragraphs 239 and 240 of the Complaint (ECF No. 1) are hereby STRICKEN.

SO ORDERED.

_____
Hon. AMIR H. ALI
United States District Judge

Date: _____, 2026

LOCAL CIVIL RULE 7(K) LIST OF COUNSEL

United States Attorney's Office
Rick Blaylock, Jr.
TX Bar No. 24103294
Assistant United States Attorney
Asset Forfeiture Coordinator
601 D Street, N.W.
Washington, D.C. 20001
(202) 252-6765
rick.blaylock.jr@usdoj.gov

Attorney for Plaintiff United States of America

The Crypto Lawyers PLLC
Rafael Yakobi (CA Bar No. 312421)
(Admitted *pro hac vice)*
11035 Lavender Hill Dr, Ste. 160-220
Las Vegas, NV 89135
Telephone: 619.317.0722
rafael@thecryptolawyers.com

The Crypto Lawyers PLLC
Agustin M. Barbara (FL Bar No. 1002677)
(Admitted *pro hac vice)*
848 Brickell Avenue, Penthouse 5
Miami, Florida 33131
Telephone: 619.317.0722
agustin@thecryptolawyers.com

Greenberg Traurig, LLP
Michael Burshteyn (CA Bar No. 295320)
(Admitted *pro hac vice)*
Marcelo Barros (CA Bar No. 339069)
(Admitted *pro hac vice)*
101 Second Street, Suite 2200
San Francisco, California 94105
Telephone: 415.655.1300
Facsimile: 415.707.2010
Michael.Burshteyn@gtlaw.com
Marcelo.Barros@gtlaw.com

Greenberg Traurig, LLP
Nathan J. Muyskens (DC Bar No. 45821)
(Admitted *pro hac vice)*
Michael A. Pusateri (DC Bar No. 1005463)

2101 L Street, N.W., Suite 1000
Washington, D.C. 20037
Telephone: 202.533.2354
Nathan.Muyskens@gtlaw.com
pusaterim@gtlaw.com

Boies Schiller Flexner LLP
Daniel G. Boyle (CA Bar No. 332518)
(Admitted *pro hac vice)*
2029 Century Park East, Suite 1520
Los Angeles, CA 90067
Telephone: 213.629.9040
dboyle@bsfllp.com

Attorneys for Claimants Identified in ECF No. 14, Schedule A

Aylstock, Witkin, Kreis & Overholtz, PLLC
Christopher Klotz
17 E. Main Street, Suite 200
Pensacola, FL 32502
850-202-1010
Fax: 850-916-7449
cklotz@awkolaw.com

Aylstock, Witkin, Kreis & Overholtz, PLLC
Daniel Thornburgh
(Admitted *pro hac vice)*
17 E. Main Street, Suite 200
Pensacola, FL 32502
850-202-1010
Fax: 850-916-7449
dthornburgh@awkolaw.com

Nigh Goldenberg Raso & Vaughn, PLLC
Marlene Jaye Goldenberg
14 Ridge Square NW
Third Floor
Washington, DC 20016
202-978-2228
Fax: 202-792-7927
mgoldenberg@nighgoldenberg.com

Attorneys for Claimants Identified in ECF No. 34-1, Schedule A

Nivedita Kaul
469 Camino Sur
Palm Springs, CA 92262
Email: nivie@digitaldefendersgroup.org

Pro Se

David C. Silver
SILVER MILLER
5411 North University Drive - Suite 203
Coral Springs, FL 33067-4637
954-516-6000
DSilver@SilverMillerLaw.com

Attorney for Movant Lisa Kang

Steptoe LLP
Andrew C. Adams (NY Bar No. 4727293)
(Admitted *pro hac vice*)
Drew C. Harris (NY Bar No. 5501507)
(Admitted *pro hac vice*)
1114 Avenue of the Americas
New York, NY 10036
(212) 957-3081
acadams@steptoe.com
dcharris@steptoe.com

Steptoe LLP
Steven H. Levin (DC Bar No. 985290)
1330 Connecticut Avenue, NW
Washington, DC 20036
(202) 429-8169
slevin@steptoe.com

Attorneys for Claimant Infiniweb Technology Inc.