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

JOINT STATUS REPORT

Pursuant to the Court's July 24, 2026 Minute Order, Plaintiff United States of America, Claimant Infiniweb, Claimants 1-118, and Claimants 119-266 (collectively, the "2025 Parties") respectfully submit this Joint Status Report.

As detailed herein, the 2025 Parties have reached agreement in principle on settlement, subject to ongoing diligence and final approval and execution, and accordingly, request that decision on their pending motions be held in abeyance in order to, in addition to the above, permit Plaintiff to seek approval of this agreement in principle pursuant to Department of Justice policy and final execution by all settling parties.

In the interim, Plaintiff, and if required the other 2025 Parties, will continue to address any motion practice by all non-settling parties.

Background:

On February 20, 2026, the Court heard argument on, *inter alia*, Claimants 1-118s' motion to transfer this action to the United States District Court for the Northern District of California and the Government's motion to strike Claimants 1-118's claims and answers.

In a Minute Order issued the next day, the Court ordered as follows:

> [E]ach party shall file a status report, either jointly with other parties or individually, by August 6, 2026, updating the court on the status of the case and proposing next steps. Claimants 1-118 shall indicate whether they continue to pursue transfer of venue in light of the discussion at yesterday's hearing, including the lack of support for transfer from other claimants and putative claimants and the court's indication of how it intends to rule on the motion to transfer venue

Status Update and Notice of Settlement Agreement in Principle

Since the Court's order, the 2025 Parties have met and conferred and are pleased to report that they have been able to reach agreement on a settlement framework, subject to internal approval requirements at the Department of Justice and claimants' final review and execution.

Accordingly, the 2025 Parties respectfully request that that the Court reserve decision on the following motions: (1) Claimant Infiniweb Technology Inc.'s Motion to Dismiss Complaint for Forfeiture in rem, Motion to Suppress, and Motion to Strike (ECF No. 28); (2) Claimants 1-118's Motion to Transfer Venue (ECF No. 29); (3) the government's Motion to Strike Verified Claims of Claimants 1-118 (ECF No. 44); and (4) the government's Cross-Motion to Dismiss Potential Claimant Infiniweb's Motion to Dismiss (ECF No. 50) (collectively "the Motions").

The 2025 Parties propose to update the Court promptly once a decision on the proposed settlement framework is received, but in any event no later than 60 days from the date of this Status Report.

In the avoidance of doubt, the proposed settlement framework would not address the motions filed by putative claimant Nivie Kaul.

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Dated: August 6, 2026

Respectfully submitted

/s/
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CERTIFICATE OF CONFERENCE

Plaintiff United States of America, Claimant Infiniweb, Claimants 1-118, and Claimants 119-266 have consulted and are in agreement with this Joint Status Report.

Dated: August 6, 2026

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