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-1907-AHA

[PROPOSED] ORDER

Upon consideration of Claimant Nivedita Kaul's Motion to Defer Ruling on the Government's Motion to Strike [Doc. 91], to Compel Service of Sealed Filings [Docs. 92 and 93], to Strike or Disregard Specified Exhibits, for an Extension of Time, and for Protective Relief, and any opposition thereto, and the entire record, it is hereby ORDERED that:

1. Ruling on the Government's Motion to Strike [Doc. 91] is HELD IN ABEYANCE pending: (a) service on Claimant of Docs. 92 and 93; (b) resolution of the Government's compliance with the Protective Order [Doc. 88] and Local Civil Rule 5.1(h)(1); (c) clarification on the scope of the August 7, 2026 stay, and (d) adequate time for Claimant to respond after complete service.

2. Claimant is GRANTED an extension of time to respond to Doc. 91, running for thirty (30) days from the date of complete service of Docs. 92 and 93 and resolution of the Government's sealing compliance under Local Civil Rule 5.1(h)(1).

3. The Court CLARIFIES the scope of the August 7, 2026 stay. If the stay does not suspend motion practice, the Court SETS a reciprocal briefing schedule for Claimant's pending motions in Doc.

79, including her motion to dismiss under Rule 12(b)(1) and Supplemental Rule G(8)(b), on equal footing with the Government's motion practice.

4. Claimant's right to seek leave to amend her Verified Claim [Doc. 53] and Answer [Doc. 54] under Federal Rule of Civil Procedure 15(a)(2) and Local Civil Rule 7(i) is RESERVED. Claimant shall lodge proposed amended pleadings with any motion to amend.

5. The exhibits to Doc. 91 specified in Section III.D of the Motion are [STRUCK / DISREGARDED] as the Court specifies.

6. The Government is DIRECTED to serve Claimant with Docs. 92 and 93, and with the exhibit cited at Doc. 91 page 14 as "Ex. 13," within five (5) days of this Order. The Government shall identify by docket entry and attachment number where "Ex. 13" was filed, or state under oath that it was not filed.

7. The Government is DIRECTED to identify the second, redacted wallet address in Exhibit 1 to Doc. 91, and to explain its connection, if any, to Wallet 0x82e.

8. The Government is ORDERED to file a compliant motion to seal for Docs. 92 and 93 or show cause why it has not done so within five (5) days of this Order.

9. The Government is DIRECTED to show cause why its public filing in Doc. 91 of Claimant's private victim identifiers, law enforcement cooperation correspondence written during a period of acute distress, operational details, and non-party mother-identifying information was not an unreasonable exposure of a cooperating witness to retaliation by a transnational organized crime syndicate. Pending further order, the Clerk is DIRECTED to restrict public access to the following materials in Doc. 91 and its exhibits: Claimant's private email addresses; law enforcement

cooperation emails (Exhibits 2-7); Claimant's mother's identifying and financial information; fraud website addresses and wallet addresses. Claimant preserves all claims and remedies arising from this exposure for appropriate adjudication.

10. Claimant's non-party mother is protected from further public exposure in any filing by any party. Any future filing by any party referencing Claimant's household shall redact her mother's identifying information or substitute "non-party family member" unless otherwise ordered.

11. Wallet 0x82e is PRESERVED pending adjudication of Claimant's pending motion for emergency preliminary injunction and bifurcation [Doc. 79]. The Government, any settling claimant, and any party with potential control over the defendant property are RESTRAINED from moving, distributing, settling, or otherwise disposing of Wallet 0x82e or the assets traced thereto absent further order of this Court. The Court reserves jurisdiction to appoint a receiver under Rule 66 or to bifurcate Wallet 0x82e from any settlement disposition upon application. This Order does not adjudicate the merits of Claimant's asserted interest in Wallet 0x82e, which is raised in Doc. 79 and its supporting exhibits.

12. All of Claimant's objections, defenses, and claims are PRESERVED.

13. The Government shall file a status report addressing its compliance with paragraphs 6, 7, 8, and 9 above within ten (10) days of this Order.

SO ORDERED.

Date: _____

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UNITED STATES DISTRICT JUDGE