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. 1:25-cv-1907 (AHA)

MOTION FOR EXTENSION OF TIME WITH LEAVE

The United States, through undersigned counsel, respectfully moves under Paragraph 6 of this Court's Standing Order for a fourteen-day extension of time, from October 22, 2026, to November 5, 2026, to file a response to Claimant Nivedita Kaul's Motion to Amend/Correct Claim. Claimants Infiniweb, 1-118, AWKO Claimants, and Dr. Kang do not oppose. Claimant Kaul opposes.

I. Original Date

The original date the motion is seeking to extend or have continued is today, October 22, 2026.

II. Previous Extensions

There are no previous extension requests to respond to this motion.

III. Good Cause

The United States received an unprompted email from an attorney in Turkey who appears to be opposing counsel in the proceeding central to Claimant Kaul's argument: Case No. 2024/277 E. from the Istanbul 19th High Criminal Court. The email contained a fourteen-page signed letter, an eighty-two-page document of Turkish source document, and an eighty-three-page document of the corresponding English translation. The documents appear to show information regarding the

proceedings in Turkey that include findings of a court-appointed expert panel, Claimant Kaul's asserted losses, and the ongoing nature of the proceeding—in which no final judgment has been entered. It appears there inconsistencies between these documents and Kaul's characterization of the Turkish proceeding. Counsel for the United States received this email at 10:02 AM Eastern Time and emailed opposing counsels requesting an extension approximately 30-minutes later.

The United States requests an extension of time to determine the veracity of these documents, consult with the Department of Justice Office of International Affairs, and to speak to the Turkish attorney, as the documents address to the focal points of the United States's response and the heart of Kaul's argument.

IV. The effect, if any, that the granting will have Existing Deadlines

This extension request may impact timing on a potential ruling by the court regarding Claimant Kaul's request to amend her complaint. It does not appear to affect other deadlines.

V. Suggested Deadline

The United States requests an additional 14 days to Thursday, November 5, 2026.

VI. Opposing Parties' Positions

Claimants Infiniweb, 1-118, AWKO Claimants, and Dr. Kang do not oppose. Claimant Kaul is opposed.

Dated: October 22, 2026

Respectfully submitted,
JEANINE FERRIS PIRRO
United States Attorney

/s/ Rick Blaylock, Jr.
Rick Blaylock, Jr.
TX Bar No. 24103294
Assistant United States Attorney
Asset Forfeiture Coordinator
United States Attorney's Office

601 D Street, N.W.
Washington, D.C. 20001
(202) 252-6765
rick.blaylock.jr@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2026, I electronically filed the foregoing Consent Motion, together with the proposed order, with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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