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

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 previously disclosed to the Court, the 2025 Parties have reached agreement in principle on settlement in this action, which is subject to ongoing diligence and currently undergoing consideration pursuant to Department of Justice policy, prior to final execution by all settling parties. *See* ECF No. 85.

The 2025 Parties previously requested that the Court stay motion practice between the 2025 Parties while this agreement in principle was undergoing review. *Id*. On August 7, 2026, the Court stayed the case "pending further order of the court" and instructed the parties to file a joint status report on September 4, 2026, and every 30 days thereafter until the stay is lifted. On September 4, 2026 and October 5, 2026, the 2025 Parties filed joint status reports pursuant to the Court's order. ECF Nos. 96, 101.

Status Report:

The agreement in principle remains under consideration by the 2025 Parties and subject to approval pursuant to Department of Justice policy.

Several other motions regarding Claimant Nivedita Kaul (who is not one of the 2025 Parties) remain pending: Claimant Kaul's motion for injunctive and other relief (ECF No. 79), the government's motion to strike Ms. Kaul's claim (ECF No. 91), Claimant Kaul's motion to defer ruling on the government's motion to strike, to compel service of sealed filings, to strike or disregard specified exhibits, for an extension of time, and for protective relief (ECF No. 94), Claimant Kaul's motion for leave to amend her claim (ECF No. 104),[1] and Claimant Kaul's motion for leave to file a supplemental response in opposition to Claimant Infiniweb's motion to dismiss the complaint (ECF No. 110). On October 28, 2026, the Court entered a minute order stating, "Claimant Kaul is advised that no further motions or filings will be accepted in this case until the court resolves the pending motions or otherwise ordered by the court."

[1] The Court subsequently ordered the government and Claimant Infiniweb to file any response to Claimant Kaul's motion by October 22, 2026. On October 22, 2026, the government filed a motion seeking an extension of time to file its reply, on the ground that it had received that morning information from Turkish defense counsel bearing on the veracity of Claimant Kaul's claims. ECF No. 106. That evening, the government and Claimant Infiniweb filed responses opposing Claimant Kaul's motion for leave to amend. ECF Nos. 107, 108.

In the avoidance of doubt, the 2025 Parties are not seeking a stay of any of these motions, which would not be resolved by the pending agreement in principle.

Dated: November 4, 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: November 4, 2026

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