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DIGITAL ASSETS IN THE DIFC: CONNECTING REGULATIONS WITH EFFECTIVE REMEDIES



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I. INTRODUCTION

1. The DIFC has consistently sought to position itself at the forefront of legal and institutional developments in the digital economy. Its initiatives have ranged from the 2018 "Court of the Blockchain" project and the establishment of the Digital Economy Court **("DEC")** in 2021, followed by DEC specialist procedures under Part 58 of the Rules of the DIFC Courts **("RDC"),** to the enactment of the Digital Assets Law in 2024 **("DAL"),** and the development of a regulatory framework for digital assets. Singularity Legal has followed this evolution closely.[i] Our 2024 article, *DIFC announces the enactment of new Digital Assets Law*, examined the statutory reforms in detail. In our 2025 publication, while examining The Last 365 Days in the DIFC Courts, we considered the developing jurisprudence, including *Huobi (now Gate Mena) v Tabarak* on the recognition of Bitcoin as property, and *Techteryx v Aria Commodities* on freezing and proprietary relief concerning stablecoin reserves. We also examined the Courts' wider digital initiatives, including the Digital Assets Wills service and AI-enabled case management.

2. The past year has seen further developments. In December 2025, the DIFC Courts announced arrangements for specialist digital-asset custody and blockchain intelligence services to assist court users.[ii] This was followed by significant changes to the Dubai Financial Services Authority's **("DFSA")** crypto-token regulatory framework in January 2026.[iii] Recent decisions have also provided further insight into the treatment of digital-asset disputes before the DIFC Courts. Most recently, in October 2026, the Courts introduced blockchain-verifiable credentials for judicial documents, facilitating independent verification of their authenticity across borders.[iv] Together, these developments

reflect the DIFC's continued efforts to adapt its legal and institutional framework to the demands of the digital economy.

3. This chapter examines three developments in particular: the introduction of specialist custody and blockchain tracing services, and their implications for asset preservation and recovery; the DFSA's revised crypto-token regime and its implications for regulated firms and investors; and the treatment of digital-asset disputes before the DEC and the wider DIFC Courts, including the lessons from *CoinMENA and Gate Mena*. The chapter considers how the DIFC's evolving framework addresses the practical challenges of protecting, controlling and recovering digital assets.

II. INTEGRATING SPECIALIST DIGITAL-ASSET SERVICES INTO COURT PROCEEDINGS

4. Alongside developing the substantive law and procedural framework governing digital assets, the DIFC Courts have continued to invest in the technical capabilities necessary to handle such matters. On 15 December 2025, as part of the DIFC Courts' Growth Strategy 2026–2030, the Courts announced the introduction of specialist digital-asset custody and blockchain intelligence services through two external providers, Zodia Custody **("Zodia")** and Crystal Intelligence **("Crystal").**[v] These optional services are intended to support the management, investigation and enforcement of complex digital-asset matters and will be considered on a case-by-case basis where sufficient necessity is demonstrated. The initiative extends beyond facilitating access to specialist services for litigants, reflecting a broader effort to strengthen the Courts' institutional capacity to handle digital-asset matters.

5. The development builds upon the specialist procedural framework already established for the DEC. Under RDC 58.11, the Court may

authorise specified persons to operate digital assets through available cryptographic keys or other access mechanisms. Practical Guidance Note 1/2022 **("PGN 1/2022")** further contemplates the involvement of persons controlling digital assets, including keyholders and custodians; tailored directions for producing and presenting digital evidence; and the appointment of court experts or assessors to assist with technical issues. The new arrangements could facilitate the practical application of these provisions by making specialist custody and investigative expertise more readily accessible. However, the announcement does not prescribe how these providers are to be instructed or appointed in individual proceedings.

6. **Specialist custody:** Zodia's proposed role is to provide secure, neutral custody of disputed digital assets during proceedings and assist in implementing resulting orders. Its services may enable assets to be held independently of the disputing parties, reducing the risk of unauthorised transfers without determining the underlying ownership dispute.

7. Specialist custody has already been employed by parties in digital asset insolvency and restructuring. In the US, following FTX's collapse in 2022, the exchange arranged for BitGo to safeguard approximately USD 740 million in digital assets during its bankruptcy proceedings, subject to court approval.[vi] Zodia was appointed by WazirX in March 2025 ahead of its proposed restart, while the associated restructuring was proceeding through the Singapore High Court.[vii] In April 2026, Zodia also announced an arrangement with PwC UK to provide digital-asset custody services in insolvency cases.[viii] These examples concern arrangements made by businesses or insolvency practitioners, rather than court-directed neutral custody. They nevertheless illustrate how independent custodians may assist in safeguarding and administering digital assets where ownership, control or entitlement requires careful management.

8. For the DIFC Courts, one immediate practical application is for proprietary injunctive relief. Digital asset disputes typically have proprietary claims at their heart. This is illustrated by *Techteryx v Aria Commodities,* where the claimant asserted proprietary rights over reserves backing the TrueUSD stablecoin and their traceable proceeds, and successfully obtained both a proprietary injunction and a worldwide freezing order ("**WFO**").[ix] In such disputes, the challenge is not merely obtaining the injunction, but securing the property pending determination of ownership. While conventional assets may be delivered up into Court or a solicitor's account, comparable arrangements for digital assets present practical difficulties, particularly where the assets are controlled through private keys. Zodia's neutral custody services could provide a mechanism for implementing such arrangements, allowing disputed digital assets to be held independently of the parties. This would complement the Court's existing powers to order the custody or preservation of property under RDC 25.1(3)(a), to secure disputed funds under RDC 25.1(12), and to authorise persons to operate digital assets under RDC 58.11, where the assets can lawfully and practically be transferred.

9. Further, in ordinary commercial proceedings, parties may seek to provide digital assets as security for costs, fortification of cross-undertakings or under other protective arrangements. A specialist custodian could facilitate such arrangements, subject to the Court accepting the proposed form of security and prescribing suitable conditions. The experience of custodians in insolvency proceedings also suggests potential applications in the administration or preservation of digital assets subject to insolvency or other court-supervised processes. These uses would require appropriate arrangements governing valuation, access, authorised instructions, costs and release. In particular, custody protects against unauthorised transfers but does not eliminate fluctuations in the value of the assets held.

10. **Asset-tracing intelligence:** Crystal will provide blockchain intelligence and investigative support. Its tools can trace movements through multiple blockchain addresses, screen wallets, monitor transactions and present complex transaction paths visually. The DIFC Courts envisage these capabilities supporting case management, compliance and enforcement, as well as oversight of the Digital Assets Wills service and specialist training for Court staff. Its proposed role therefore extends beyond investigating individual claims to strengthening the Courts' institutional capacity to handle digital-asset matters.

11. The use of blockchain-analysis tools in litigation is not new; parties can already engage such providers independently. The significance of the DIFC initiative lies instead in facilitating access to these capabilities within the judicial framework. However, the announcement leaves open whether Crystal would act in particular proceedings as a party-instructed service provider, a court-appointed expert or assessor, or an independent investigative resource. These distinctions matter because the provider's role will determine how its findings are produced, disclosed and tested.

12. Comparative jurisprudence illustrates the issues that may arise. In *DVA v DVC* (2026), the Singapore International Commercial Court considered a proprietary claim involving disputed cryptocurrency transfers, where certain movements within the platform's pooled wallets were recorded on internal ledgers rather than the blockchain.[x] This demonstrates the limits of public blockchain data and the potential need for further disclosure from intermediaries. In England, *D'Aloia v Persons Unknown* (2024) concerned tracing evidence prepared using specialist blockchain-analysis software, including Crystal.[xi] The Court criticised the expert's inadequate explanation of his methodology and choices between different approaches. In the United States,

United States v Sterlingov (2026) illustrates a further consideration: the Court of Appeals upheld the admission of evidence based on Chainalysis Reactor while also considering the extent to which the defence required access to the software's underlying methodology and proprietary source code.[xii] Access to certain assumptions and heuristics had been permitted under protective arrangements, while access to the source code was refused on the facts.

13. These decisions identify three considerations for the DIFC Courts: the completeness of information available to investigators, the reliability of analytical methods, and the ability of parties to scrutinise the resulting evidence. PGN 1/2022 already provides for directions concerning digital evidence, confidentiality and court-appointed experts or assessors. These mechanisms could assist in integrating specialist blockchain intelligence into proceedings. However, institutional selection of a provider should not confer any presumption of evidential reliability. The applicable safeguards, including independence, disclosure of methodology and opportunities for challenge, will depend on the provider's precise role.

14. The initiative therefore represents a further step in the DIFC Courts' efforts to develop the practical capabilities necessary for digital-asset disputes. Its significance lies not in creating new remedies or investigative technologies, but in facilitating their use within the existing judicial framework. Whether this improves case management, preservation, investigation and enforcement will depend on how the services are deployed and the procedural safeguards governing their use.

III. REGULATORY SAFEGUARDS AND TOKENISATION

15. The DFSA regulates financial services involving crypto tokens in or from the DIFC. Its framework is distinct from the regime administered

by Dubai's Virtual Assets Regulatory Authority **("VARA"),** which regulates virtual-asset activities throughout the Emirate of Dubai, including its other free zones, but excluding the DIFC. Although the two regimes operate independently, the regulators signed a memorandum of understanding in October 2025 to strengthen cooperation on licensing, supervision, enforcement and information exchange.[xiii]

16. **The DFSA's revised Crypto Token framework:** On 12 January 2026, the DFSA introduced significant changes to its Crypto Token regime, shifting responsibility for assessing the suitability of most crypto tokens from the regulator to authorised firms.[xiv] Previously, firms undertaking relevant activities were generally restricted to tokens recognised by the DFSA. Under the revised framework, the DFSA no longer maintains a list of Recognised Crypto Tokens. It continues to determine the suitability of *Fiat Crypto Tokens,* i.e. digital tokens designed to maintain a stable value by reference to a single fiat currency, such as the US dollar or UAE dirham. However, the responsibility for assessing the suitability of "non-fiat" crypto tokens, such as Bitcoin and Ether, has shifted to the firms offering the relevant services.

17. The changes give firms greater commercial flexibility, accompanied by corresponding obligations:

(a) Suitability assessments: Firms must assess, on reasonable grounds, the token's purpose, governance, technology, market characteristics and regulatory status, having regard to their proposed activities and customers.[xv]

(b) Ongoing monitoring: Firms must disclose the tokens they consider suitable, retain supporting records and review their assessments regularly. The DFSA expects reviews at least every six

months. Where a token ceases to be suitable, the relevant activity must cease or reasonable steps must be taken towards cessation.[xvi]

(c) Broader investment activity: Previous restrictions on the extent to which funds may invest in crypto tokens have been removed, subject to suitability assessment and risk management. An exception also permits authorised firms to provide custody of certain tokens without satisfying the token-suitability condition otherwise applicable to relevant activities; this does not independently authorise their promotion or trading.[xvii]

18. The reform replaces a significant element of prior regulatory screening with continuing responsibility on firms. Businesses can consider a wider range of products without awaiting individual recognition, although the costs of assessment and monitoring may be harder for smaller providers to absorb. Investors may encounter greater variation between firms in the tokens offered and the risks accepted. In a dispute involving investment losses, the relevant question will not simply be whether a token declined in value, but whether the firm reasonably assessed, disclosed and monitored the associated risks. Its records may therefore become important evidence in claims concerning due diligence, disclosure or risk management.

19. **International approaches:** Comparable developments are evident elsewhere, although the regulatory approaches are not identical. In Singapore, guidance applicable from June 2025 requires digital payment token service providers to establish policies for assessing tokens, keeping listings under review and managing associated conflicts of interest.[xviii] In the United Kingdom, the Financial Conduct Authority's June 2026 rules introduce requirements concerning cryptoasset admissions to trading, due diligence and investor disclosures, with the principal regime scheduled to commence on 25 October 2027.[xix] Like the DFSA's reforms, these approaches place

greater responsibility on market participants for the assets they offer, although they regulate different activities.

20. The United States offers a different comparison. In March 2025, the Office of the Comptroller of the Currency ("**OCC**") removed the requirement for national banks to obtain prior supervisory clearance before undertaking specified cryptoasset custody, stablecoin and blockchain-payment activities. In December 2025, the OCC further confirmed that national banks may undertake riskless principal transactions involving cryptoassets, acting as intermediaries without holding the assets as trading inventory.[xx] Additionally, the GENIUS Act, enacted in July 2025, establishes a federal framework for payment stablecoins, including requirements concerning reserve backing, disclosure and the treatment of holders' claims in issuer insolvency.[xxi] These provisions are particularly relevant to disputes concerning backing reserves, such as *Techteryx,* although the legal frameworks are distinct. Unlike the DFSA's token-suitability reforms, these measures address institutional participation and stablecoin issuance. They nevertheless illustrate the same broader challenge: expanding digital-asset activity while ensuring appropriate safeguards.

21. **Safeguarding client assets:** In the DIFC, the revised DFSA Client Assets regime took effect on 1 January 2026, strengthening protections for Client Money, Client Investments and Client Crypto Tokens.[xxii] The regime imposes requirements concerning custody arrangements, systems and controls, recordkeeping and oversight. These protections are particularly relevant where tokens are held through intermediaries, since customers may own assets without directly controlling the means of transferring them.

22. Existing DFSA custody rules also prescribe specific obligations where transfers go wrong. Under rule 15.4.5 of the DFSA Rulebook's Conduct of Business module ("**COB**"), a regulated firm

responsible for an unauthorised or incorrectly executed transfer of Client Crypto Tokens must restore the client's account to the position it would otherwise have occupied, promptly and within three business days. It must also maintain adequate arrangements to compensate for losses where a transfer cannot be reversed. These duties provide a more specific framework for assessing the responsibility of regulated custodians than the general description of a service as "custody". A breach of applicable regulatory obligations may also give rise to civil liability under Article 94 of the DIFC Regulatory Law, subject to statutory conditions.

23. **Tokenisation and the underlying rights:** The DFSA's Tokenisation Regulatory Sandbox, launched in March 2025, allows selected firms to test tokenised investments, including shares, bonds and fund units, within a supervised environment.[xxiii] Tokenisation has also progressed elsewhere in Dubai. In February 2026, the Dubai Land Department, working with VARA and other partners, launched the second phase of its real-estate tokenisation project, enabling controlled secondary-market resale of approximately 7.8 million property tokens.[xxiv] This moves beyond testing issuance to examining how tokenised interests may be transferred between investors.

24. The central legal question is whether transferring a token also transfers the rights it represents. A tokenised share, for example, might change hands on a digital ledger without a corresponding change to the legally effective shareholder register. Alternatively, the holder may possess only contractual rights against an issuer, rather than a proprietary interest in the underlying asset. The answer depends on the legal structure and applicable rules governing ownership and transfer.[xxv] The Dubai real-estate pilot is noteworthy because it seeks to connect digital transfers with the existing property registration framework. Ultimately, the success of tokenisation depends not merely

on technical transferability, but on the enforceability of the rights represented.

25. These developments reflect a common direction: expanding digital-asset activity while placing greater responsibility on regulated intermediaries. The DFSA's reforms offer businesses flexibility, but make suitability assessments, custody safeguards and compliance records more consequential. For investors, the strength of the framework will ultimately be tested when assets are lost, intermediaries fail or ownership rights are disputed.

IV. THE DIGITAL ECONOMY COURT: SPECIALIST JUDICIAL MANAGEMENT

26. There can be no doubt that the DIFC is making considerable and consistent investment in digital asset legislation, regulation and specialist court infrastructure. This comes into sharper focus when we see businesses opting into its law and dispute-resolution framework. One illustration is *Obert and Ona v Ondray,* where a consultancy agreement concerning a security token offering provided for DIFC law and DIFC-seated arbitration.[xxvi]

27. However, the DEC's published caseload remains limited. The publicly available DEC judgments and orders presently identify only two distinct proceedings: *Gate Mena and Techteryx*. Neither originated in the DEC. *Gate Mena* began in the Technology and Construction Division and was remitted to the DEC following its appeal, while *Techteryx* was transferred from CFI 020/2025.[xxvii] At the same time, notwithstanding the broad scope of RDC 58.7, proceedings involving businesses operating in the digital-asset sector continue to be pursued through ordinary Court of First Instance ("**CFI**") proceedings, as illustrated by *CoinMENA v Foloosi* and *BHM Capital v 3iQ Corporation.*[xxviii] Notably, the current published record does not

establish whether these disputes would have benefited from specialist DEC procedures or why they proceeded through the ordinary CFI list.

28. Against this background, the question arises as to what the DEC offers beyond ordinary CFI proceedings. The DEC is, after all, a specialist division of the CFI, exercising the same jurisdiction and broadly the same substantive powers and remedies. From the Court's perspective, the advantage is apparent. A specialist division allows digital-economy disputes to be managed by judges with a particular focus on these matters, who can develop familiarity with the technical issues involved and apply procedures tailored to their complexities. The Court may therefore transfer suitable proceedings to the DEC, as seen in *Gate Mena and Techteryx*. Justice Michael Black, appointed Judge in Charge of the DEC in 2022, has presided over both cases. From a litigant's perspective, however, the practical advantages are less immediately apparent. The question is therefore what Part 58 adds to ordinary CFI procedure, and in what circumstances those differences may be material. The following table examines the principal procedural distinctions, including the extent to which the DEC's specialist provisions supplement powers already available to the CFI.

Procedural feature	Ordinary CFI proceedings	DEC proceedings
Nature of the dispute	General commercial and civil disputes falling within the DIFC Courts' jurisdiction, subject to the applicable procedural rules.	Broad range of digital-economy disputes, including fintech, digital assets, blockchain, AI, e-commerce, payment platforms, Web3, software, data and related claims (RDC 58.7). No requirement of technical complexity.

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Procedural feature	Ordinary CFI proceedings	DEC proceedings
Simplified procedure for smaller claims	SCT procedure for claims up to AED 500,000, or higher in specified cases by agreement (Part 53)	Consumer DEC Claims up to AED 500,000, or higher by agreement. SCT judges hear claims; overlap with SCT process, flexible service, with paper determination normally applicable (RDC 58.50–58.61).
Commencement and transfer	Generally under Part 7, or Part 8 where that procedure is appropriate. Part 7 claims may be transferred to relevant specialist divisions.	RDC 58.14 requires a DEC claim to commence under Part 7 and explain its suitability. The Court can transfer cases into or out of the division at any time.
Acknowledgment and jurisdictional objections	Acknowledgment need not summarise the defence; jurisdictional challenges require a separate application under Part 12.	Mandatory acknowledgment identifying the defence and any jurisdictional grounds. Part 12 expressly disapplied. A properly raised jurisdictional objection is treated as an application (RDC 58.33–58.38).
Early planning and preparation	Ordinary case management under Part 26, with timetables and directions determined by the Court. First CMC ordinarily follows the defence.	Part 26 largely disapplied. Defence optional before first CMC; first CMC date fixed within seven days of acknowledgment or transfer, normally before Judge in Charge, enabling early specialist directions (RDC 58.39–58.48).

Procedural feature	Ordinary CFI proceedings	DEC proceedings
Interim relief	Freezing orders, property-preservation orders and associated disclosure are available.	Same remedies, plus express power to authorise persons to operate or modify digital assets through cryptographic keys or other access mechanisms (RDC 58.11).
Documents and technical evidence	General powers concerning production, electronic evidence, experts and assessors under Part 28 and Part 31.	Guidance expressly addresses issue-specific production, early disclosure of key documents and modified production obligations (PGN 1/2022, [15]–[19]), and technology-assisted review, native-format digital evidence and court-appointed technical experts or assessors (PGN 1/2022, [20]–[22], [30]).
Joinder of relevant parties	General joinder powers under Part 20.	Express guidance to consider digital signatories, keyholders and present or former custodians whose involvement may be necessary (PGN 1/2022, [12]).
Sensitive information	Private hearings and confidentiality protections are available where justified.	Ordinary DEC claims are not automatically private. However, there is specific guidance on confidentiality rings, independent expert review, segregation and redaction of sensitive technical information (PGN 1/2022, [10]–[11]).

29. The DEC's principal advantage lies in providing a specialist framework for managing digital-economy disputes. A straightforward payment claim may gain little from this framework, while disputes involving wallet control, custodians or complex digital evidence may

benefit from earlier and more focused case management. *Gate Mena and Techteryx* illustrate the types of disputes for which such specialist management may be useful. While Part 58 introduces meaningful procedural differences and PGN 1/2022 provides guidance tailored to digital-economy disputes, their practical impact remains largely untested in the limited published jurisprudence.

V. CONCLUSION

30. The DIFC's recent reforms can be understood as part of a broader effort to attract and retain digital-asset businesses. Greater flexibility in offering products becomes commercially valuable when firms can also anticipate their legal obligations and rely on effective remedies. By developing these features together, the DIFC strengthens the case for businesses to establish operations, commit capital and build longer-term relationships within the jurisdiction. The potential attraction lies in reducing the uncertainty that firms and their investors must account for when deciding where to conduct business.

31. The next stage will test how effectively these reforms work together. Confidence in the DIFC's treatment of digital assets may encourage counterparties to choose its law and dispute-resolution framework for their transactions. Its courts and enforcement capabilities therefore have economic significance well before litigation begins: they help parties assess the risks of entering a commercial relationship. Whether these reforms produce that confidence will depend on consistent supervision, proportionate compliance costs and decisions that make rights and responsibilities easier to predict. If the DIFC delivers on those measures, its investment in digital-asset regulation and judicial infrastructure could become a sustained reason for businesses to choose the jurisdiction.

References:

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[ii] DIFC Courts, 'DIFC Courts to permit next-generation digital custodian and blockchain intelligence capabilities for court users' (15 December 2025)

[iii] DFSA, 'The DFSA implements major updates to Crypto Token Regulatory Framework, enhancing market integrity and supporting innovation in DIFC' (12 January 2026)

[iv] DIFC Courts, 'DIFC Courts begin issuing court documents with NFT-based credentials, making them globally verifiable in seconds' (16 October 2026)

[v] DIFC Courts, 'DIFC Courts to permit next-generation digital custodian and blockchain intelligence capabilities for court users', (15 December 2025)

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[ix] Singularity Legal, 'The Evolving Landscape of Freestanding Injunctions in the DIFC'

[x] DVA and another v DVC, [2026] SGHC(I) 4 (24 April 2026), paragraph 13 and footnote 4, and paragraphs 27 and 29

[xi] Fabrizio D'Aloia v Persons Unknown Category A and others, [2024] EWHC 2342 (Ch), paragraphs 6, 222(ii) and 251 – 254

[xii] United States of America v Roman Sterlingov, No. 24-3161 (US Court of Appeals for the District of Columbia Circuit, 25 September 2026), pp. 19 – 23

[xiii] DFSA, 'Live from GITEX: DFSA and VARA strengthen regulatory cooperation' (15 October 2025)

[xiv] DFSA, 'The DFSA implements major updates to Crypto Token Regulatory Framework' (12 January 2026)

[xv] DFSA Rulebook, General module ("GEN"), Rule 3A.2.1(1)–(4); DFSA, Supervisory Guidelines on Assessing the Suitability of Crypto Tokens (15 December 2025), paras 3–6; DFSA, Policy Statement on Fiat Crypto Tokens

[xvi] DFSA Rulebook, GEN 3A.2.1A and accompanying Guidance, particularly Guidance para 3

[xvii] DFSA, 'Crypto Token Regulation', section 'Latest regulatory update: Rules effective from 12 January 2026'; DFSA Rulebook, GEN 3A.2.1(4)

[xviii] Monetary Authority of Singapore, Guidelines on the Provision of Consumer Protection Safeguards by Digital Payment Token Service Providers, PS-G03, paragraphs 1.2.1 and 6.2.1 – 6.2.6

[xix] Financial Conduct Authority, PS26/9, Admissions & Disclosures and Market Abuse Regime for Cryptoassets (June 2026), paragraphs 2.8 – 2.16 and 2.22 – 2.28 and accompanying responses

[xx] Office of the Comptroller of the Currency, Interpretive Letter 1183 (7 March 2025)

[xxi] Guiding and Establishing National Innovation for U.S. Stablecoins Act (GENIUS Act), Public Law 119-27 (18 July 2025), ss 4, 11 and 20. Section 20 provides for commencement on the earlier of 18 months after enactment or 120 days following issuance of the relevant final implementing regulations.

[xxii] DFSA, 'Client Assets'; DFSA, 'The DFSA publishes FAQ on revised Client Assets regime' (24 June 2025); DFSA Rulebook, GEN 2.2.10A and applicable COB Client Assets provisions

[xxiii] DFSA, 'The DFSA seeks expressions of interest for Tokenisation Regulatory Sandbox' (17 March 2025)

[xxiv] Dubai Land Department, 'Dubai Land Department launches Phase II of the Real Estate Tokenisation Project' (9 February 2026)

[xxv] See UNIDROIT, Principles on Digital Assets and Private Law (2023), Principle 4 and Commentary 4.1–4.3 and 4.18–4.19 (non-binding model principles)

[xxvi] Obert and Ona v Ondray, ARB 014/2025 (9 October 2025), paragraphs 4–9 and 40. The resulting award, arising from non-payment under a settlement, was recognised by the DIFC Courts in October 2025.

[xxvii] Gate Mena DMCC and another v Tabarak Investment Capital Ltd and another, [2023] DIFC CA 002 (13 June 2024), paragraphs 2 and 260(2); Techteryx Ltd v Aria Commodities DMCC and others, [2025] DIFC DEC 001 (16 September 2025, amended 17 October 2025)

[xxviii] CoinMENA B.S.C. (C) v Foloosi Technologies Ltd, CFI 067/2025 (7 July 2026), paragraphs 3–7 and 24–29 describing the underlying CFI proceedings. Although CoinMENA is a cryptocurrency service provider, the underlying claim concerns allegedly withheld payment-processing proceeds and appears to raise conventional contractual and commercial issues rather than questions of ownership or control of cryptoassets. BHM Capital Financial Services PSC v 3iQ Corporation, CFI-002-2024. While 3iQ operates in the digital-asset investment sector, the published orders are procedural and do not disclose the nature of the underlying dispute. Neither case establishes why proceedings were continued in the general CFI list rather than the DEC.

ABOUT US

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(c) Chambers & Partners (Global) – Singularity for dispute resolution practice (2025)
(d) Legal 500 (Asia Pacific) - Recognised for Dispute Resolution practise in Arbitration (2025)
(e) Chambers & Partners (Asia Pacific) – Singularity for dispute resolution practice (2025)
(f) AsiaLaw – Recognised for Dispute Resolution, Construction, Banking & Financial Services and Technology & Telecommunications practise areas (2024)

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(g) LegalMedia 360 (India) – Recognised for Dispute Resolution practice (Arbitration) (2024)
(h) Ranked as "Most Active in the Enforcement & Annulment of Commercial Arbitration Awards" - Jus Connect's 2023 Rankings

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Singularity Legal is licensed to practice as legal consultants in the UAE, including as solicitors before the courts at Dubai International Financial Centre (DIFC), Abu Dhabi Global Market (ADGM), and Bahrain International Commercial Court (BICC).

Our partner, Prateek Bagaria, has also been registered as a Part II lawyer with full rights of audience before the DIFC Courts and will be heading the firm's Middle East practice.

On the firm's entry into the UAE, he said:
"DIFC is an upcoming business and trade hub and has been a priority center for Indian financial institutions, funds, family businesses, multinational corporations, and trading houses, among others, operating in the Asia-Africa corridor. Moreover, in light of the new India-UAE Comprehensive Economic Partnership Agreement (CEPA), business dealings in the DIFC are slated to grow exponentially. We are thrilled to expand our practice to the Middle East, where our clients increasingly require our assistance with their disputes. This expansion will also give the clients more immediate access to the firm's specialists and wider network in the MENA region."

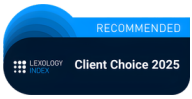
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South Asia Office

1809-1810, One Lodha Place,
Senapati Bapat Marg,
Lower Parel,
Mumbai - 400013

Tel: +91 22 4976 5861

United Arab Emirates

Level 41, Emirates Towers,
Sheikh Zayed Road,
Dubai, UAE
PO Box 31303

Tel: +971 4313 2043

Singapore Office

138 Market Street,
#24-01 CapitaGreen,
Singapore 048946

Tel: +65 6679 6045

e: singularity@singularitylegal.com
w: www.singularitylegal.com

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