Case 1:11-cv-02564-LBS Document 175 Filed 03

CHAMBERS OF LEONARD B. SAND

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff, : <u>STIPULATION AND ORDER</u>

- V. - :

POKERSTARS, et al,;

Defendants;

ALL RIGHT, TITLE AND INTEREST IN THE ASSETS OF POKERSTARS, et al.,

Defendants-in-rem.

11 Civ. 2564 (LBS)

USDS SDNY DOCUMENT

ELECTRONICALLY FILED

DOC#:

DATE FILED: 3-20-12

WHEREAS, on or about September 21, 2011, an amended forfeiture and civil money laundering complaint (the "Amended Complaint") was filed in this matter seeking the forfeiture of certain properties (the "Subject Property") pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against, among others, Rafael Furst;

WHEREAS, on or about November 28, 2011, claimant Rafael Furst filed a Verified Claim asserting an ownership/possessory interest in certain Subject Properties;

WHEREAS, Rafael Furst has until March 19, 2012, to answer or otherwise respond to the Amended Complaint;

WHEREAS, the United States and Rafael Furst are engaging in good faith settlement negotiations and Rafael

Furst has requested additional time to answer or otherwise respond to the Amended Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, Jason H. Cowley, Assistant United States Attorney, of counsel, and Rafael Furst, by his attorney, David Angeli, Esq. of the Angeli Law Group, that:

- Rafael Furst shall have until May 14, 2012, to file an answer or otherwise respond to the Amended Complaint.
- The signature pages of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument. Signature pages may be by fax and such signatures shall be deemed as valid originals.

AGREED AND CONSENTED TO:

PREET BHARARA

United States Attorney

Southern District of New York

By:

Jason H. Cowley

Assistant United States Attorney One St. Andrew's Plaza

New York, New York 10007

(212) 637-2479

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RAFAEL FURST

By:

David H. Angeli Angeli Law Group

121 Sw Morrison St., Suite 400

Portland, OR 97204 (503)-954-3783

Counsel for Rafael Furst

3/16/12 DATE

SO ORDERED

HONORABLE LEONARD B. SAMD UNITED STATES DISTRICT JUDGE 3/20/20/2

RAFAEL FORSI		
By:		
David H. Angeli, Esq.	DATE	_
Angeli Law Group		
121 Sw Morrison St., Suite 400		
Portland, OR 97204		
(503)-954-3783		
Counsel for Rafael Furst		
,		
SO ORDERED:	. / /	
I mond Dans	3/20/2012	
HONORABLE LEONARD B. SAND	DATE	

UNITED STATES DISTRICT JUDGE