UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

•

- v. -

POKERSTARS, et al.

Defendants;

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

Defendants-in-rem. :

NOTICE OF MOTION TO

(1) CONDUCT EXPEDITED DISCOVERY RELATING TO

FUGITIVE DISENTITLEMENT

AND (2) STAY

CONSIDERATION OF THE POKERSTARS CLAIMANTS'

MOTION TO DISMISS THE

VERIFIED FIRST AMENDED

COMPLAINT

11 Civ. 2564 (LBS)

PLEASE TAKE NOTICE that, upon the accompanying

Memorandum of Law in Support of the Government's Motion to (1)

Conduct Expedited Discovery Relating to Fugitive Disentitlement and (2) Stay Consideration of the Pokerstars Claimants' Motion to Dismiss the Verified First Amended Complaint, together with the Declaration of Assistant United States Attorney Jason H. Cowley in support thereof, all exhibits to such memorandum and declaration, and upon all the pleadings heretofore filed in this action and all proceedings had herein, Plaintiff United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, will move this Court, before the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, at the United States

Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order (1) Permitting the Government to Take Expedited Discovery Relating to Fugitive Disentitlement and (2) Staying Consideration of the Pokerstars Claimants' Motion to Dismiss the Verified First Amended Complaint.

Dated: New York, New York July 18, 2012

Respectfully submitted,

PREET BHARARA United States Attorney for the Southern District of New York

By: /s/
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