



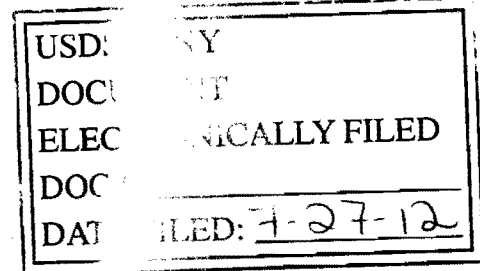
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 26, 2012

BY HAND

Honorable Leonard B. Sand
United States District Judge
United States Courthouse
500 Pearl Street, Room 1650
New York, NY 10007



Re: *United States v. Pokerstars, et al.*,
11 Civ. 2564 (LBS)

Dear Judge Sand:

The Government respectfully writes in regard to upcoming deadlines relating to the motions to dismiss filed by (1) PokerStars entities the Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Stelekram Ltd., Sphene International Ltd., and PYR Software Ltd. (collectively, "PokerStars") (D.E. 201); and (2) Full Tilt Poker-affiliated individuals Howard Lederer (D.E. 189), Rafael Furst (and a related Trust) (D.E. 191, 193), and Christopher Ferguson (D.E. 195). These motions raise many identical and overlapping issues.

On July 18, 2012, the Government filed a motion to stay consideration of PokerStars' motion to dismiss and to take expedited discovery relating to the applicability of the fugitive disentitlement statute, 28 U.S.C. § 2466, to the claims filed by PokerStars (D.E. 225, the "July 18 Motion"). Also on that date, the Government served upon PokerStars special interrogatories and document requests pursuant to Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions with respect to PokerStars' claims for funds held in certain third-party payment-processing accounts and other funds. As stated in Rule G(6)(c): "The government need not respond to a claimant's motion to dismiss the action under Rule G(8)(b) until 21 days after the claimant has answered these interrogatories." Accordingly, the Government's response to PokerStars' motion is automatically deferred pursuant to Rule G and the Government in the July 18 Motion sought a further stay of PokerStars' motion in connection with fugitive disentitlement issues. PokerStars has indicated that it plans to move to quash these interrogatories and document requests.

Because of the identical and overlapping issues raised in the motions to dismiss, judicial economy counsels strongly towards considering the motions to dismiss filed by the Full Tilt Poker-affiliated individuals at the same time as PokerStars' motion to dismiss. Accordingly, the

Government requests, with the consent of counsel for PokerStars,¹ Lederer, Furst (and the related Trust), and Ferguson, that the Court terminate the present response and reply deadlines for all motions to dismiss pending (1) PokerStars' answering the outstanding special interrogatories (or the Court quashing such interrogatories) and (2) the Court's resolution of the Government's July 18 Motion.

Upon PokerStars' answering the special interrogatories (or the Court quashing such interrogatories) and the Court's resolution of the Government's July 18 Motion, the affected parties will consult with one another and report to the Court regarding scheduling of briefing going forward.

Respectfully submitted,

PREET BHARARA
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By: 

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cc: Anand Raman, Esq., counsel for the Oldford Group, Ltd., Rational Entertainment Enterprises Ltd., Stelekram Ltd., PYR Software Ltd.; and Sphene International Ltd. (by email)
Eliot Peters, counsel for Howard Lederer (by email)
David Angeli, counsel for Rafael Furst and Telamonian Ajax Trust (by email)
Jon Harris, counsel for Christopher Ferguson (by email)

SO ORDERED:



7/27/12

The Honorable Leonard B. Sand
United States District Judge

¹ While PokerStars consents to the relief requested in this letter, PokerStars has indicated that it will be opposing the July 18 Motion.