: UNITED STATES OF AMERICA, Plaintiff, : – v – : 11 Civ. 2564 (LBS) POKERSTARS, et al. : Defendants; : : ALL RIGHT, TITLE, AND INTEREST IN THE ASSETS OF POKERSTARS, et al.; : Defendants-in-rem. : - - - - - - - - - - - - - - - - x

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Affidavit of Jason H. Cowley in Support of Government's Motion, together with the exhibits thereto, the Government's Memorandum of Law in Support of Motion, together with the exhibit thereto, and upon all papers and prior proceedings herein, the United States of America will move before the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, at such time as the Court shall direct, (1) for the entry of proposed stipulated order of settlement between the Government and Absolute Pokeraffiliated parties; and (2) for an order, pursuant to Rule G(7) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, permitting the United States Marshals Service to seize and conduct an interlocutory sale of all of the right, title, and interest in the assets of certain Absolute Poker corporate entities, with the net proceeds generated by such

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sale to be held by the Government as substitute res for the ongoing litigation with other claimants who have asserted an interest in those assets, or such other relief as the Court may determine to be just and proper.

Dated:	New	York,	New	York
	July	[,] 31,	2012	

Respectfully submitted,

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

By: /s/ SHARON COHEN LEVIN MICHAEL D. LOCKARD JASON H. COWLEY One St. Andrew's Plaza New York, New York 10007 (212) 637-1060/2193/2479