

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Plaintiff,

v.

POKERSTARS, ET AL.

Defendants.

11-Civ. 2564 (LBS)

NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

PLEASE TAKE NOTICE that, upon the Affidavit of Adam B. Michaels, sworn to June 27, 2011, and the Certificates of Good Standing annexed thereto, Claimants MAS, Inc. and Ultra Safe Pay, LLC will move this Court before the Honorable Leonard B. Sand, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, allowing the admission *pro hac vice* of Jeremy D. Frey, an attorney with the law firm of Pepper Hamilton LLP and a member in good standing of the Bars of the State of New Jersey and the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Mr. Frey in any state or federal court.

Dated: New York, New York
June 27, 2011

Respectfully submitted,



Adam B. Michaels. (AM 9120)
PEPPER HAMILTON LLP
Attorneys for Defendant
The New York Times Building
620 Eighth Avenue
New York, New York 10018-1405
(212) 808-2700

Counsel for Claimants MAS, Inc. and Ultra
Safe Pay, LLC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

ADAM B. MICHAELS, being duly sworn, deposes and says:

1. I am a member in good standing of the bar of the State of New York and was admitted to practice in 2003. I was also admitted to the bar of the United States District Court for the Southern District of New York on July 8, 2003, and am in good standing with this Court.

2. I am of counsel with the law firm of Pepper Hamilton LLP, counsel for Claimants MAS, Inc. and Ultra Safe Pay, LLC in the above-captioned action, and make this Affidavit in support of the motion for the admission of Jeremy D. Frey to practice *pro hac vice* in the above-captioned action.

3. Mr. Frey is an attorney with the law firm of Pepper Hamilton LLP. His telephone number is 215-981-4445. His e-mail address is freyj@pepperlaw.com. As shown in the Certificates of Good Standing annexed to this Affidavit, he is a member in good standing of the Bars of the State of New Jersey and the Commonwealth of Pennsylvania, admitted in 1991 and 1979, respectively.

4. There are no pending disciplinary proceedings against Mr. Frey in any state or federal Court.

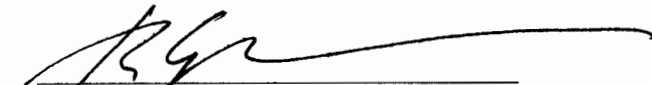
5. Mr. Frey is a skilled attorney and a person of integrity. He is experienced in federal practice and with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Mr. Frey *pro hac vice*.

7. It is respectfully requested that the Court grant the motion for an order permitting Jeremy D. Frey to appear in this action as counsel for Claimants MAS, Inc. and Ultra Safe Pay, LLC for all purposes *pro hac vice*. A proposed order for Mr. Frey's admission *pro hac vice* is annexed hereto.


ADAM B. MICHAELS

Sworn to before me this
27th day of June, 2011.


Notary Public

RUSSELL E. ADLER
Notary Public, State of New York
No. 02FU6082979
Qualified in Westchester County
Commission Expires Nov. 4, 2014

Supreme Court of New Jersey

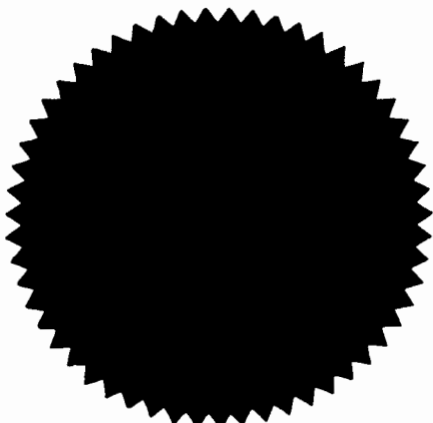


Certificate of Good Standing

This is to certify that **JEREMY D FREY**
(No. **045101991**) *was constituted and appointed an Attorney at Law of New Jersey on* **December 19, 1991** *and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.*

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
21ST day of June , 20 11 .*

Clerk of the Supreme Court



Supreme Court of Pennsylvania

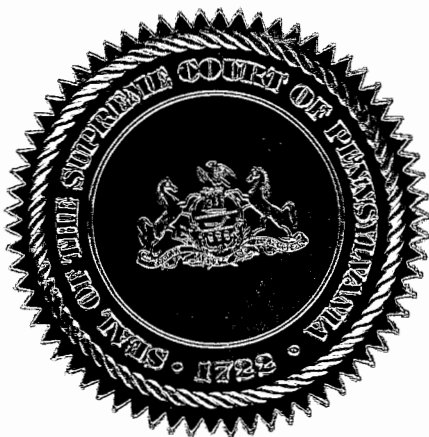
CERTIFICATE OF GOOD STANDING

Jeremy Daniel Frey, Esq.

DATE OF ADMISSION

November 15, 1979

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 16, 2011

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ORDER FOR ADMISSION
PRO HAC VICE

Upon the motion of Adam B. Michaels, attorney for Claimants MAS, Inc. and Ultra Safe Pay, LLC and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that Jeremy D. Frey is admitted to practice *pro hac vice* as counsel for Claimants MAS, Inc. and Ultra Safe Pay, LLC in the above captioned case. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rule governing discipline of attorneys. Counsel shall immediately apply for an Electronic Case Filing (ECF) password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____

U. S. D. J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2011, I caused a true and correct copy of Claimants MAS, Inc. and Ultra Safe Pay, LLC's Notice of Motion to Admit Counsel Pro Hac Vice, Affidavit of Adam B. Michaels, and exhibits annexed thereto to be served via First Class Mail. Service was made on following counsel:

Michael Fred Bachner
Bachner & Associates, P.C.
26 Broadway, Suite 2310
New York, NY 10004

Attorneys for Defendant LST Financial,
Inc.

Elizabeth Nicole Warin
Cozen O'Connor
45 Broadway
New York, NY 10006
(212)-883-4969

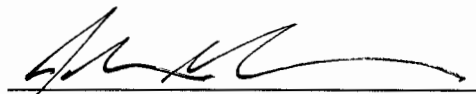
Attorneys for Defendant Tiltware LLC

Jason Harris Cowley
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America

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Attorneys for Plaintiff United States of
America


Adam B. Michaels