

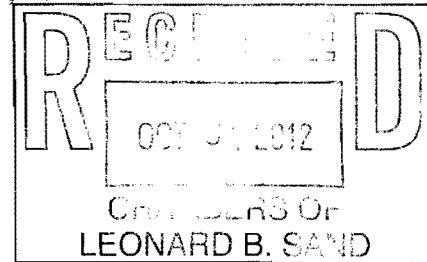
United States Attorney
Southern District of New York

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

October 1, 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 scheduling in the above-captioned matter. The Government, after conferring with counsel for all parties in this action and without opposition, proposes the following schedule.

In regard to the Second Amended Complaint (the "Complaint," D.E. 272), the Complaint was hand-filed on September 11, 2012. The Complaint did not appear on CM/ECF, however, until September 26, 2012. Accordingly, the Government requests that the parties shall have until October 19, 2012, to answer the Complaint.

The Government has conferred with counsel for claimant/defendants Lederer, Furst/Ajax Trust, and Ferguson. These parties had filed motions to dismiss the First Amended Complaint and plan to file updated motions to dismiss regarding the Second Amended Complaint. The Government and these parties have concurred and request the following briefing schedule:

1. Lederer, Furst/Ajax Trust, and Ferguson shall have until November 16, 2012, to file motions to dismiss.
2. The Government shall have until December 21, 2012, to file a response.
3. Lederer, Furst/Ajax Trust, and Ferguson shall have until January 11, 2013, to file replies.

Additionally, because of the anticipated filing of these motions as well as several currently pending motions to strike claims and a motion for, *inter alia*, the entrance of a settlement with certain of the Absolute Poker entities, the Government, after conferring with the remaining parties, requests that the current additional deadlines, including discovery deadlines, in the action be terminated pending the resolution of all of these motions.¹ Upon the resolution of these motions, the remaining parties can confer and suggest a discovery schedule to the Court. The Government respectfully suggests that this procedure will promote efficiency and avoids unnecessary expense of time and resources.

The Government has communicated with counsel for all parties remaining in this action regarding these issues. All counsel that have responded have provided consent for the proposed schedule. No parties have opposed.

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¹ The following motions have been fully briefed and are ripe for the Court's consideration: (1) the Government's motion to strike the claim of Avoine - Servico De Consultadoria E Marketing, LDA ("Avoine") (DE 197); (2) the Government's motion to strike the claim of Robb Evans (D.E. 199); (3) the Government's motion to strike the claim of Cardroom International (D.E. 203); and (4) the Government's motion for (1) the entry of a proposed settlement regarding certain Absolute Poker-affiliated entities and (2) the interlocutory sale of the assets of those entities (D.E. 237).

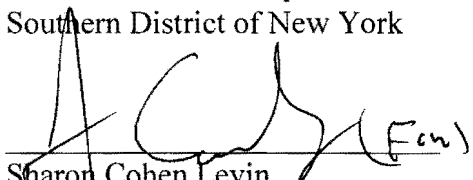
Accordingly, the Government respectfully requests that the Court so order the following:

1. That all parties (with the exception of Lederer, Furst/Ajax Trust, and Ferguson who will be filing renewed motions to dismiss as noted below) shall have until October 19, 2012, to answer the Complaint;
2. That the motions schedule regarding Lederer, Furst/Ajax Trust, and Ferguson set forth above be adopted; and
3. That all other deadlines in this action, including discovery deadlines, be terminated until the resolution of the motions to dismiss and the other motions set forth in this Letter.

Respectfully submitted,

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

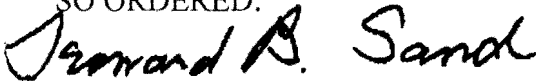
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Jerry Bernstein, counsel for Absolute Poker; Leonard Rodes, counsel for Avoine;
Richard Levitt, counsel for Raymond Bitar; Elliot Peters, counsel for Howard Lederer
Jon Harris, counsel for Chris Ferguson; David Angeli, counsel for Rafael Furst and Ajax
Trust; Robert J Hantman and Zachary Kozak, counsel for Cardroom International LLC;
Eric Lycan, counsel for the Commonwealth of Kentucky; Jeremy Frey, counsel for MAS,
Inc. and Ultra Safe Pay, LLC; Gary Caris, Counsel for Robb Evans

SO ORDERED:



The Honorable Leonard B. Sand
United States District Judge

10/2/12