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DATE FILED: 10 - 3 - 11

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ X

STIPULATION AND ORDER

- v. -

11 Civ. 2564 (LBS)

POKERSTARS, et al.;

Defendants;

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

Defendants-in-rem.

WHEREAS, on or about April 14, 2011, a verified complaint, 11 Civ. 2564 (LBS) (the "Complaint") was filed under seal in the United States District Court for the Southern District of New York seeking the forfeiture of certain properties pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), including, but not limited to, All Funds Formerly On Deposit at Hawaii National Bank, Honolulu, Hawaii, in Account Number 12008656, held in the Name of MAS, Inc. (the "MAS Subject Property") and All Funds Formerly On Deposit at UMPQUA Bank, Roseburg, Oregon, in Account Number 972402309, held in the Name of Ultra Safe Pay (the "Ultra Safe Pay Subject Property"), and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against PokerStars and others;

WHEREAS, on or about June 21, 2011, claimant MAS, Inc.,

filed a Verified Claim asserting an ownership interest in the MAS Subject Property;

WHEREAS, on or about June 21, 2011, claimant Ultra Safe Pay, LLC filed a Verified Claim asserting an ownership interest in the Ultra Safe Pay Subject Property;

WHEREAS, on or about September 21, 2011, a verified amended complaint in this action (the "Amended Complaint") was filed seeking the forfeiture of, among others, the MAS Subject Property and the Ultra Safe Pay Subject Property, and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against against PokerStars and others;

WHEREAS, MAS, Inc. and Ultra Safe Pay LLC have requested additional time to answer or otherwise respond to the Amended Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, Jason H. Cowley, Assistant United States Attorney, of counsel, and MAS, Inc. and Ultra Safe Pay, LLC, by their attorneys, Adam B. Michaels, Esq. and Jeremy D. Frey, Esq., of Pepper Hamilton LLP, that:

 MAS, Inc. and Ultra Safe Pay, LLC each shall have until October 31, 2011, to answer or otherwise respond to the Amended Complaint. 2. The signature pages of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument. Signature pages may be by fax and such signatures shall be deemed as valid originals.

AGREED AND CONSENTED TO:

PREET BHARARA United States Attorney Southern District of New York

D17

Jason H. Cowley
Assistant United States Attorney

One St. Andrew's Plaza New York, New York 10007

(212) 637-2479

9 30 2011

MAS INC. and ULTRA SAFE PAY, LLC

Bv.

Adam B. Michaels, Esq.
Pepper Hamilton LLC
The New York Times Building

620 Eighth Avenue New York, New York 10018-1405 (212) 808-2700

Jeremy D. Frey, Esq. (pro hac vice pending) Pepper Hamilton LLP 3000 Two Logan Square 18th and Arch Streets Philadelphia, Pennsylvania 19103 (215) 981-4000

Counsel for MAS Inc. and Ultra Safe Pay, LLC

SO ORDERED:

HONORABLE LEONARD B. SAND

UNITED STATES DISTRICT JUDGE

10/3/11 DATE