UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

NOTICE OF MOTION TO Plaintiff, STRIKE THE CLAIM AND

DISMISS THE COUNTER - v. -:

CLAIM OF ADAM WEBB

POKERSTARS, et al. 11 Civ. 2564 (LBS)

Defendants:

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

Defendants-in-rem.

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Government's Motion to Strike the Claim and Dismiss the Counter Claim of Adam Webb, and upon all the pleadings heretofore filed in this action and all proceedings had herein, Plaintiff United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, will move this Court, before the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order striking the Claim of Adam Webb, for lack of standing pursuant to Rule 12(b) of the Federal Rules of Civil Procedure and Rule G(8)(c) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and dismissing the Counter Claim of Adam Webb as barred by sovereign immunity and unauthorized by

statute.

Dated: New York, New York

October 3, 2011

Respectfully submitted,

PREET BHARARA

United States Attorney for the Southern District of New York

By: ____/s/

SHARON COHEN LEVIN MICHAEL D. LOCKARD JASON H. COWLEY

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