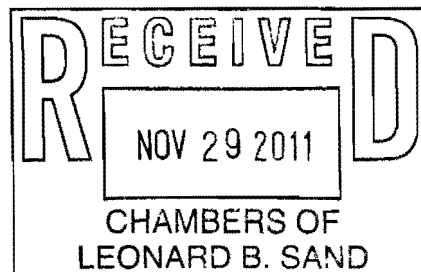


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

Plaintiff,

- v. -

POKERSTARS, et al.,

Defendants;

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

Defendants-in-rem.

STIPULATION AND ORDER

11 Civ. 2564 (LBS)

USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 11-30-11

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 (the "Subject Property") pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against, *inter alia*, PokerStars, Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Pyr Software Ltd., Stelekram Ltd., and Sphene International Ltd. (collectively, the "PokerStars Companies");

WHEREAS, on or about May 27, 2011, the United States provided notice of the filing of the Complaint to the PokerStars Companies by and through their counsel, David M. Zornow, Esq. of Skadden, Arps, Slate, Meagher & Flom LLP;

WHEREAS, on or about July 5, 2011, the PokerStars Companies<sup>1</sup> waived service of the Complaint and Summons;

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

WHEREAS, on October 31, 2011, the Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Sphene International Ltd., and Stelekram Ltd filed a claim for certain of the Subject Property. On that same date, PYR Software Ltd. also filed a claim for certain on the Subject Property.

WHEREAS, the PokerStars Companies have until November 30, 2011, to answer or otherwise respond to the Amended Complaint;

WHEREAS, the PokerStars Companies are engaged in settlement discussions with the United States and 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

---

<sup>1</sup> Pyr Software Ltd. waived service of the Complaint and Summons on July 4, 2011.

York, Jason H. Cowley, Assistant United States Attorney, of counsel, and the PokerStars Companies, by their attorney, David M. Zornow, Esq., of Skadden, Arps, Slate, Meagher & Flom LLP, that:

1. The PokerStars Companies shall have until January 2, 2012, to answer or otherwise respond to the Amended Complaint.

2. This Order is without prejudice to any rights, remedies, claims, or defenses of any of the parties hereto.

3 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

By: 

Jason H. Cowley  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2193

11/29/11  
DATE

POKERSTARS, OLDFORD GROUP LTD., RATIONAL ENTERTAINMENT ENTERPRISES LTD., PYR SOFTWARE LTD., STELEKRAM LTD., and SPHENE INTERNATIONAL LTD.

By: 

David M. Zornow, Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, New York 10036  
(212) 735-2890

11/28/11  
DATE

Counsel for PokerStars, Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Pyr Software Ltd., Stelekram Ltd., and Sphene International Ltd.

SO ORDERED:

  
HONORABLE LEONARD B. SAND  
UNITED STATES DISTRICT JUDGE

11/30/2011  
DATE