UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff, : <u>STIPULATION AND ORDER</u>

- v. - :

11 Civ. 2564 (LBS)

POKERSTARS, et al,;

Defendants;

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

Defendants-in-rem.

USDS SDNY DOCUMENT

ELECTRONICALLY FILE

DOC #:

DATE FILED: <u>| 2-20-1(</u>

WHEREAS, on or about September 21, 2011, an amended forfeiture and civil money laundering complaint (the "Amended Complaint") was filed in this matter 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, among others, Rafael Furst;

WHEREAS, on or about October 26, 2011, Rafael Furst waived service of the Complaint and Summons;

WHEREAS, on or about November 28, 2011, claimant Rafael Furst filed a Verified Claim asserting an ownership/possessory interest in certain Subject Properties;

WHEREAS, Rafael Furst has until December 19, 2011 to answer or otherwise respond to the Amended Complaint.

WHEREAS, the United States and Rafael Furst are engaging in good faith settlement negotiations and Rafael Furst has 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 Rafael Furst, by his attorney, Benjamin N. Souede, Esq. of Angeli Law Group LLC, that:

1. Rafael Furst shall have until January 23, 2012, to file an answer or otherwise respond to the Amended Complaint.

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:

Cowley

Assistant United States Attorney

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

(212) 637-2479

RAFAEL FURST

By:

Benjamin N. Souede

Angeli Law Group LLC

121 SW Morrison St., Ste. 400

Portland, OR 97204

(503) 954 · 2232

Counsel for Rafael Furst

SO ORDERED:

HONORABLE LEONARD B. SAND

UNITED STATES DISTRICT JUDGE

12/20/2011