

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

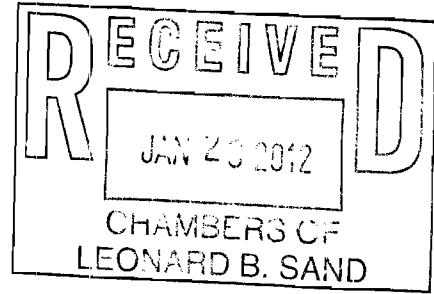
v.

POKERSTARS, et al.;

Defendants;

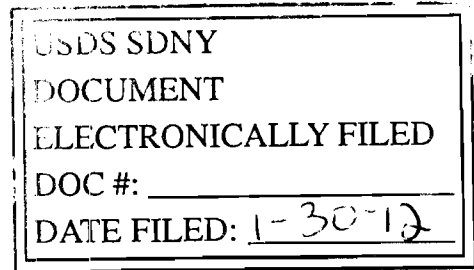
ALL RIGHTS, TITLE AND INTEREST IN THE
ASSETS OF POKERSTARS, et al.,

Defendants-in-rem.



STIPULATION AND ORDER

11 Civ. 2564 (LBS)



WHEREAS, on or about April 14, 2011, a verified forfeiture and civil money laundering complaint (the "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 certain defendants;

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

WHEREAS, on or about January 5, 2012, claimant Avoine – Servico de Consultadoria e Marketing, LDA ("Avoine") filed a Verified Claim asserting an ownership/possessory interest in certain Subject Property;

WHEREAS, Avoine has until January 26, 2012 to answer or otherwise respond to the Amended Complaint;

WHEREAS, Avoine has requested additional time to answer or otherwise respond to the Amended Complaint;

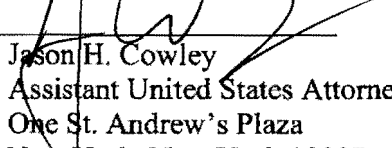
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, Jason H. Cowley, Assistant United States Attorney, of counsel, and Avoine, by its attorney, Leonard A. Rodes, Esq. of Trachtenberg Rodes & Friedberg LLP, that:

1. Avoine shall have until March 9, 2012, to file an 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

By: 
Jason H. Cowley
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
(212) 637-2479

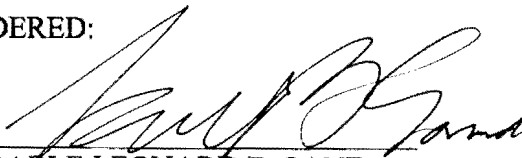
1/27/12
DATE

AVOINE – SERVICIO DE CONSULTADORA E MARKETING, LDA

By: 
Leonard A. Rodes, Esq. (LR 3675)
Trachtenberg Rodes & Friedberg LLP
545 Fifth Avenue, Suite 640
New York, New York 10017
(212) 972-2929
Counsel for Avoine

1-25-2012
DATE

SO ORDERED:


HONORABLE LEONARD B. SAND
UNITED STATES DISTRICT JUDGE

1/30/2012
DATE