Doc. 163

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)

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 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 against the PokerStars Companies;

WHEREAS, on or about October 31, 2011, the PokerStars

Companies filed a verified claim for certain of the Subject

Property;

WHEREAS, the PokerStars Companies are 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 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:

The PokerStars Companies shall have until March
 2012, to answer or otherwise respond to the Amended

 $^{^{1}}$ Pyr Software Ltd. waived service of the Complaint and Summons on July 4, 2011.

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

Bv:

Jason H. Cowley

Assistant United States Attorney

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

(212) 637-2193

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

David M. Zorn

David M. Zornow, Esq.

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Four Times Square

New York, New York 10036

(212) 735-2890

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

Tep 82012