Doc. 169

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

STIPULATION AND ORDER

LECTRONICALLY FILED

- V. -

11 Civ. 2564 (LBS)

DATE FILED:

:

POKERSTARS, et al.,

Defendants;

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

Defendants-in-rem.

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, Full Tilt Poker, Tiltware LLC., Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco, Ltd., Vantage Ltd., Ranston, Ltd., Mail Media Ltd., and Full Tilt Poker Ltd. ("Full Tilt");

WHEREAS, on or about June 14, 2011, the United States provided notice of the filing of the Complaint to Full Tilt by

and through their counsel, Barry Boss, Esq. of Cozen O'Connor;

WHEREAS, on or about June 20, 2011, Full Tilt 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 Full Tilt;

WHEREAS, on or about November 14, 2011, Filco Ltd., Kolyma Corporation A.V.V., Vantage Ltd., Tiltware LLC, Pocket Kings Consulting Ltd., and Pocket Kings Ltd. filed verified claims for certain of the Subject Property;

WHEREAS, Full Tilt has until March 19, 2012, to answer or otherwise respond to the Amended Complaint;

WHEREAS, Full Tilt is in settlement discussions with the United States and 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 Full Tilt, by their attorney, Barry Boss, Esq., of Cozen O'Connor, that:

- 1. Full Tilt shall have until May 14, 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) 637-2479

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FULL TILT POKER, TILTWARE LLC., KOLYMA CORPORATION A.V.V., POCKET KINGS LTD., POCKET KINGS CONSULTING LTD., FILCO, LTD., VANTAGE LTD., RANSTON, LTD., MAIL MEDIA LTD., and FULL TILT POKER LTD.

Barry Boss, Esq. Cozen O'Connor

The Army and Navy Building

1627 I Street, NW, Suite 1100

Washington, D.C. 20006

(202) 912-4818

Counsel for Tiltware LLC., Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco, Ltd., Vantage Ltd., Ranston, Ltd., and Mail Media Ltd.

SO ORDERED:

HONORABLE LEONARD B. SAND UNITED STATES DISTRICT JUDGE

DATE