

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA, :
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Plaintiff, :
:
-against- : 11-CV-2564 (LBS)
:
POKERSTARS, et al., :
:
Defendants; :
:
ALL RIGHT TITLE AND INTEREST IN THE :
ASSETS OF POKERSTARS, et. al., :
:
Defendants In Rem. :
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of their Motion to Dismiss the Amended Complaint for Failure to State a Claim and Declaration of David M. Zornow in support thereof, Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Pyr Software Ltd., Stelekram Ltd., and Sphene International Ltd. (collectively, the “PokerStars Defendants”), by their attorneys, Skadden, Arps, Slate, Meagher & Flom LLP (David M. Zornow and Anand S. Raman) will move this Court, before the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, at the United States Courthouse for the Southern District of New York, on a date and time to be set by the Court, for an Order dismissing the Government’s Verified First Amended Complaint, pursuant to Rules 9 and 12(b) of the Federal Rules of Civil Procedure and Rules E and G of the Supplemental Rules

for Certain Admiralty and Maritime Claims, as to the PokerStars Defendants and as to all property to which the PokerStars Defendants have filed verified claims.

PLEASE TAKE FURTHER NOTICE that, pursuant this Court's June 29, 2012, Order, Plaintiff shall file its Response by July 30, 2012, and the PokerStars Defendants shall file their reply by August 13, 2012.

Respectfully submitted,

/s/ David M. Zornow

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Dated: July 9, 2012