

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

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UNITED STATES OF AMERICA, :
:
Plaintiff, : 11-CV-2564 (LBS)
-against- :
:
POKERSTARS, et al., :
:
Defendants; :
:
ALL RIGHT TITLE AND INTEREST IN THE :
ASSETS OF POKERSTARS, et. al., :
:
:
Defendants In Rem. :
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**DECLARATION OF DAVID M. ZORNOW IN SUPPORT OF THE
POKERSTARS DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT
OF THEIR MOTION TO DISMISS THE VERIFIED FIRST AMENDED COMPLAINT**

DAVID M. ZORNOW, under penalty of perjury, declares as follows:

1. I am admitted to the Bar of this Court and am a Partner in the firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for the PokerStars Defendants.
2. I submit this declaration in support of the PokerStars Defendants' Memorandum of Law in Support of their Motion to Dismiss and to transmit to the Court true and correct copies of the following documents that this Court may consider in connection with its determination of the Motion:

EXHIBIT

DOCUMENT

- A-1** Verified Claim of Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Stelekram Ltd., and Sphene International Ltd. Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims (October 31, 2011).
- A-2** Verified Claim of PYR Software Ltd. Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims (October 31, 2011).
- A-3** License to Operate for Rational Entertainment Enterprises Limited, Isle of Man Gambling Supervision Commission (September 10, 2010).
- A-4** Letter Agreement between the United States and PokerStars Regarding Use of the PokerStars.com Domain Name (April 19, 2011).
- A-5** U.S. Attorney's Letter to Counsel for Elie and Campos, (September 20, 2011) (request to file under seal pending).
- A-6** Office of Legal Counsel, U.S. Dep't of Justice, *Whether proposals by Illinois and New York to use the internet and out-of-state transaction processors to sell lottery tickets to in-state adults violate the Wire Act* (September 20, 2011).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2012.

/s/ David M. Zornow

David M. Zornow