UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :

Plaintiff,

- V. -

- V. -

POKERSTARS, et al.

Defendants;

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

,

Defendants-in-rem.

STRIKE THE CLAIM AND DISMISS THE COUNTER CLAIM OF THE CLASS OF U.S. RESIDENTS WHO HELD BALANCES IN THE FULL TILT PLAYER ACCOUNTS ON

NOTICE OF MOTION TO

: 11 Civ. 2564 (LBS)

APRIL 15, 2011

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Government's Motion to Strike the Claim and Dismiss the Counter Claim of the class of United States residents who held balances in the Full Tilt Player accounts on April 15, 2011 (the "Claimants"), and upon all the pleadings heretofore filed in this action and all proceedings had herein, Plaintiff United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, 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, located at 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order striking the Claim of Claimants, for lack of standing pursuant to Rule 12(b) and (c) of the Federal Rules of Civil Procedure and Rule G(8)(c) of the Supplemental Rules for Certain Admiralty and Maritime

Claims, and dismissing the Counter Claim of the Claimants as barred by sovereign immunity and unauthorized by statute.

Dated: New York, New York July 9, 2012

Respectfully submitted,

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By: /s/
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