

UNITED STATES DISTRICT COURT
SOUTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

11 CV 2564 (LBS)

POKERSTARS, et al.,

NOTICE OF MOTION

Defendants,

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

Defendants-In-Rem.
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PLEASE TAKE NOTICE, that upon the annexed affirmation of Richard Levitt, counsel for Claimant, Raymond Bitar, in the absence of opposition from the government, and all the prior proceedings herein, the undersigned will move this Court, before the Honorable Leonard B. Sand, 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 staying these proceedings until the conclusion of the parallel criminal proceedings in *United States v. Bitar*, 12 Cr. 529 (BSJ) and for such other relief as this Court deems just and proper.

Dated: New York, New York
July 12, 2012

Respectfully submitted,



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TO: AUSA Sharon Cohen Levin, AUSA Michael Lockard, AUSA Jason Cowley
(all counsel)