

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

POKERSTARS, ET AL.,

Defendants,

ALL RIGHTS, TITLE & INTEREST
IN THE ASSETS OF
POKERSTARS, ETC.,

Defendants-In-Rem.

Civil Action No. 1:11-cv-02564-LBS

NOTICE OF MOTION TO STAY
IN REM CLAIMS AS TO DOMAIN DEFENDANTS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings herein, and any additional oral or written evidence or argument later presented to the Court, the Commonwealth of Kentucky, *ex rel.*, J. Michael Brown, Secretary Justice and Public Safety Cabinet (the “Commonwealth”), by and through counsel, will respectfully move this Court, at a date and time convenient for the Court, for an order to stay this action in regard to the *in rem* defendant domain names pokerstars.com, fulltiltpoker.com, absolutepoker.com and ultimatebet.com in favor of the prior exclusive jurisdiction of the Franklin Circuit Court in Frankfort, Kentucky.

PLEASE TAKE FURTHER NOTICE that, pursuant this Court's July 11, 2012, Order, Plaintiff shall file its Response by August 6, 2012, and the Commonwealth shall file its Reply by August 13, 2012.

DATED: July 16, 2012

Respectfully submitted,

/s/ D. Eric Lycan (pro hac vice)
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