

EXHIBIT H

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :
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 :
 Plaintiff, :
 :
 v. :
 :
 POKERSTARS, et al.; :
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 Defendants; :
 :
 ALL RIGHTS, TITLE AND INTEREST IN THE :
 ASSETS OF POKERSTARS, et al., :
 :
 Defendants-in-rem. :
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 X

CLAIMANT AVOINE – SERVICIO DE
CONSULTADORIA E MARKETING,
LDA’S FIRST SET OF
INTERROGATORIES TO THE
BLANCA CLAIMANTS
11 Civ. 2564 (LBS)

PLEASE TAKE NOTICE that, pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rules 26.3 and 33.3 of the Local Rules of the Southern District of New York, Claimants Blanca Games, Inc., SGS Systems Inc., Trust Services Ltd., Fiducia Exchange Ltd., Blue Water Services Ltd., and Absolute Entertainment, S.A. (collectively, the “Blanca Claimants”) are required to answer the following interrogatories within thirty (30) days of the date hereof.

Definitions and Instructions

- 1. The terms “document,” “person,” “concerning,” “identify,” and “and/or” shall be given the broadest possible scope under Rule 26.3 of the Local Civil Rules of this Court.
- 2. The term “Avoine” shall refer to Avoine – Servico de Consultadoria e Marketing, Lda, as well as to each other person or entity who is or was an affiliate or representative of Avoine during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control

during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

3. The term "Madeira" shall refer to Madeira Fjord AS, as well as to each other person or entity who is or was an affiliate or representative of Madeira during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

4. The term "Blanca" shall refer to Blanca Games Inc., as well as to each other person or entity who is or was an affiliate or representative of Blanca during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

5. The term "SGS" shall refer to SGS Systems Inc. and/or SGS (BVI) Inc., as well as to each other person or entity who is or was an affiliate or representative of SGS during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents,

affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

6. The term "AE" shall refer to Absolute Entertainment S.A., as well as to each other person or entity who is or was an affiliate or representative of AE during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

7. The term "Fiducia" shall refer to Fiducia Exchange Ltd., as well as to each other person or entity who is or was an affiliate or representative of Fiducia during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

8. The term "Momentum" shall refer to Momentum Technologies Inc., as well as to each other person or entity who is or was an affiliate or representative of Momentum during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents,

affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

9. The term "Panora" shall refer to Panora Tech Belize Inc. and/or Panora Tech Korea, Inc., as well as to each other person or entity who is or was an affiliate or representative of Panora during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

10. The term "Tokwiro" shall refer to Tokwiro Enterprises ENRG and/or Joseph Tokwiro Norton, as well as to each other person or entity who is or was an affiliate or representative of Tokwiro during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on its behalf or under its direction and/or control during the relevant time period, including without limitation its present and former employees, partners, agents, affiliates, predecessors, successors, accountants, attorneys, and/or other professional personnel acting on its behalf or under its or its attorneys' employment, direction, and/or control.

11. The term "Janusz" shall refer to Robert Ronald Janusz, as well as to each other person or entity who is or was an affiliate or representative of Janusz during the relevant time period, and to all other persons or entities acting, understood to act, or purporting to act on his behalf or under his direction and control during the relevant time period, including without

limitation his present and former employees, partners, family members, agents, affiliates, accountants, attorneys, and/or other professional personnel acting on his behalf or under his or his attorneys' employment, direction, and/or control.

12. The term "Absolute Poker Entities" shall refer to Madeira, Avoine, Fiducia, Momentum, Panora, SGS, AE, and Tokwiro collectively.

13. The term "Absolute Poker" shall refer to the online poker enterprise operated through several companies, including certain of the Absolute Poker Entities, that have provided online poker play services through websites including AbsolutePoker.com.

14. The term "Forfeiture Action" shall refer to the above-captioned action initiated in the United States District Court for the Southern District of New York styled United States of America v. Pokerstars; Fulltilt Poker; Absolute Poker; Ultimate Bet; et al., Case No. 11 Civ. 2564 (LBS).

15. The term "Blanca Claim" shall refer to the Verified Claim of Blanca Games, Inc. dated March 29, 2012 (Docket No. 85) filed by the Blanca Claimants in connection with the Forfeiture Action.

16. Unless otherwise specified, the time period covered by these interrogatories is the period January 1, 2005 through the date of your response.

17. These interrogatories shall be deemed continuing and requires timely supplemental answers when you acquire responsive information.

18. If you elect to withhold any information on the grounds that such information is protected from disclosure by any privilege or immunity, identify the withheld information and the privilege or immunity pursuant to which the information is withheld.

19. If you object to any portion of any request, you should identify the portion to which you object and respond to the remainder.

INTERROGATORIES

Interrogatory No. 1

Identify all current and former officers and directors of each of the following entities, and for each such officer and director (in addition to the information required by Local Rule 26.3) (a) state the period during which he or she was officer or director, and (b) identify any documents referring to his or her in the capacity of officer or director: Blanca Games, Inc.; Absolute Poker; SGS Systems Inc.; Trust Services Ltd.; Fiducia Exchange Ltd.; Blue Water Services Ltd.; Absolute Entertainment, S.A.

Interrogatory No. 2

Identify all persons who have knowledge or information concerning:

(a) the acquisition by any of the Blanca Claimants of any interest in Absolute Poker or any of the Absolute Poker Entities.

(b) the purchase or other acquisition by any of the Blanca Claimants from any of the Absolute Poker Entities of any tangible or intangible property, property interest, or right to possess or use property, including without limitation any interest in any software, hardware, equipment, or intellectual property related to Absolute Poker.

(c) the Blanca Claimants' ownership or other interest in the "assets of Claimant that have been restrained, seized or referenced in the Verified First Amended Complaint," as alleged on page 1 of the Blanca Claim.

(d) the Blanca Claimants' "legal and equitable ownership" of the "Domain Names and Blanca Games Accounts," including without limitation the "lawful

establishment of the Domain Names and accounts,” as alleged on page 2 of the Blanca Claim.

(e) any payments made or other consideration paid by (or on behalf of) any of the Blanca Claimants to (or for the benefit of) any of the Absolute Poker Entities, including without limitation payments relating to the acquisitions referred to in items 2(a) and 2(b) above and payments of licensing or use fees or royalties relating to property owned by any of the Absolute Poker Entities.

Interrogatory No. 3

Identify all documents referring to, evidencing or otherwise concerning the transactions and other matters described in item 2(a) through 2(e) above, and as to each such document identify the last known custodian thereof.

Interrogatory No. 3

Identify the last known custodian of any document described in and requested by Avoine’s Document Request that, for any reason, you do not produce in response thereto.

Interrogatory No. 4

Identify all persons having knowledge concerning (a) the operations of Absolute Poker; and (b) the operations of any of the Blanca Claimants.

Interrogatory No. 5

Identify all persons having knowledge or information concerning Avoine’s and/or Madeira’s security interest in assets of Absolute Poker.

Interrogatory No. 6

Identify all persons having knowledge or information concerning any revenue generated by Absolute Poker.

Interrogatory No. 7

Identify all persons having knowledge or information concerning dividends, distributions or other payments made to owners, members, shareholders and/or investors of or in any of the Blanca Claimants that were derived from Absolute Poker.

Interrogatory No. 8

Identify all persons having knowledge or information concerning Blanca's assertion that it is authorized to act on behalf of Absolute Poker, SGS Systems, Inc., Trust Services Ltd., Fiducia Exchange Ltd., Blue Water Services Ltd. and Absolute Entertainment, S.A. as set forth in the Blanca Verified Claim.

Interrogatory No. 9

Identify the existence, custodian(s), location(s) and general description of all documents sufficient to identify and describe in detail the assets of Absolute Poker, including without limitation any tangible or intangible property, property interest, or right to possess or use property, or any interest in any software, hardware, equipment, or intellectual property.

Interrogatory No. 10

Identify all documents reviewed or relied on in the course of answering these Interrogatories.

Dated: New York, New York
June 4, 2012

TRACHTENBERG RODES & FRIEDBERG LLP
*Attorneys for Claimant Avoine – Servico de
Consultadoria e Marketing, Lda*

By: 

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All Other Counsel of Record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

POKERSTARS, et al.;

Defendants;

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

Defendants-in-rem.

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11 Civ. 2564 (LBS)

CLAIMANT AVOINE – SERVICIO DE CONSULTADORIA E MARKETING,
LDA'S FIRST SET OF INTERROGATORIES TO THE BLANCA CLAIMANTS

TRACHTENBERG RODES & FRIEDBERG LLP

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

POKERSTARS, et al.;

Defendants;

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

Defendants-in-rem.

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x

11 Civ. 2564 (LBS)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Maryellen Kwasia, being duly sworn, deposes and says:

1. I am an intern employed by Trachtenberg, Rodes & Friedberg LLP, attorneys for Claimant. I am fully familiar with the facts herein.

2. I am over the age of eighteen; I am not a party to this action; and I reside in the city of New York, New York.

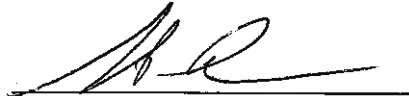
3. On June 4, 2012 I caused to be served upon the Blanca Claimants' counsel a true copy of the Claimant Avoine – Servico De Consultadoria E Marketing, Lda's First Set of Interrogatories to the Blanca Claimants and Claimant Avoine – Servico De Consultadoria E Marketing, Lda's First Request for Documents to the Blanca Claimants, in each case dated June 4, 2012, of Avoine – Servico De Consultadoria E Marketing, Lda by Hand Delivery, securely enclosed in a properly-addressed envelope, at the address indicated below:

Jerry D. Bernstein
Blank Rome LLP
405 Lexington Avenue
New York, NY 10174



Maryellen S. Kwasié

Sworn to before me this
6th day of June, 2012.



Notary Public

STEPHEN ARENA
NOTARY PUBLIC-STATE OF NEW YORK
Reg. No. 02AR6199101
Qualified in New York County
My Commission Expires March 2, 2013

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	X
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
POKERSTARS, et al.;	:	11 Civ. 2564 (LBS)
	:	
Defendants;	:	<u>AFFIDAVIT OF SERVICE</u>
	:	
ALL RIGHTS, TITLE AND INTEREST IN THE	:	
ASSETS OF POKERSTARS, et al.,	:	
	:	
Defendants-in-rem.	:	
	:	
_____	:	X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Maryellen S. Kwasié, being duly sworn, deposes and says:

1. I am a paralegal employed by Trachtenberg, Rodes & Friedberg LLP, attorneys for Claimant. I am fully familiar with the facts herein.
2. I am over the age of eighteen; I am not a party to this action; and I reside in the city of New York, New York.
3. On June 5, 2012 I caused to be served upon All Counsel of Record a true copy of the Claimant Avoine – Servico De Consultadoria E Marketing, Lda’s First Set of Interrogatories to the Blanca Claimants and Claimant Avoine – Servico De Consultadoria E Marketing, Lda’s First Request for Documents to the Blanca Claimants, in each case dated June 4, 2012, of Avoine – Servico De Consultadoria E Marketing, Lda by First Class Mail, securely enclosed in a properly-addressed and postage-paid envelope, at the addresses indicated below:

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Maryellen S. Kwasi

Sworn to before me this
6th day of June, 2012.



Notary Public

STEPHEN ARENA
NOTARY PUBLIC-STATE OF NEW YORK
Reg. No. 02AR8198101
Qualified in New York County
My Commission Expires March 2, 2013