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Attorneys for Cardroom International, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

11 CIV 2564 (LBS)

v.

POKERSTARS; FULL TILT POKER;
ABSOLUTE POKER; ULTIMATE BET, *et al.*

**DECLARATION OF CYRUS
SANAI IN SUPPORT
OF PRO HAC VICE
ADMISSION**

Defendants.


Cyrus Sanai, being duly sworn, says:

1. I am the principal of the SANAIS Law Firm, which has its address at 433 North Camden Drive, Suite 600, Beverly Hills, California, 90210. My telephone number is (310) 717-9840 and my email address is cyrus@sanaislaw.com.
2. I am currently admitted to the bar of California. I am also an English solicitor on inactive status. I have never been subject to discipline by the California Bar Association.
3. I am general counsel to Cardroom International LLC, and am counsel to it in legal proceedings in the Los Angeles Superior Court against, inter alia, the Full Tilt Poker entities which were defendants in this case, the Pokerstars entities which

were defendants in this case, as well as Ray Bitar, Howard Lederer, Chris Ferguson, and Isai Scheinberg.

4. I point out to the Court that I am a potential, though not a necessary, witness in this proceeding. My declaration attached to Cardroom's opposition to the Motion to Strike of the United States sets out my relevant knowledge. As a California attorney, this is not a barrier to my acting as counsel under California's ethics rules, as I have my client's informed written consent to appear as counsel and a witness. *See* Cal. R. Prof Conduct 5-210. The United States was asked if they would object to my appearing as counsel in this case given my status as a potential witness, and the United States took no position so long as I alerted the Court to this issue.
5. It is appropriate for me to be admitted *pro hac vice* so that I can participate in oral arguments before this Court on the pending motion and any future motions. I have personal knowledge of relevant facts and a deep understanding of the relevant law as it applies to those facts.
6. I declare under penalty of perjury that foregoing statements made by me are true and correct.

Respectfully submitted,


Cyrus Sanai