

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

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

---

11 Civ. 2564 (LBS)

**CLAIMANT MAS, INC.’S NOTICE OF  
MOTION TO DISMISS FORFEITURE COMPLAINT AND FOR OTHER RELIEF**

PLEASE TAKE NOTICE that Claimant MAS, Inc. (MAS”), by its attorneys, Pepper Hamilton LLP (by Jeremy D. Frey and Adam B. Michaels), will move this Court before the Hon. Leonard B. Sand at the U.S. Courthouse for the Southern District of New York, on a date and time to be designated by the Court, for an Order dismissing the second amended complaint as to the Defendant Property claimed by MAS and to return to MAS the funds designated in MAS’s filed claim in this matter.

MAS by this motion joins in and incorporates the motions, legal arguments and assertions contained and to be contained in motions and all supporting briefs and documents that have been and may be filed by defendants, persons representing defendants-in-rem and/or other claimants to property alleged to be subject to forfeiture, including without limitation any such motions and related matters under Fed. R. Civ. P. 12(b)(1), (b)(3) and (b)(6), as its interests may appear.

For the foregoing reasons, Claimant MAS, Inc. joins these motions, whether filed or to be filed, and requests that this Court issue an Order dismissing the second amended complaint as to the Defendant Property claimed by MAS, returning property of MAS in accordance with MAS's filed claim, and for such other and further relief as this Court may deem proper.

Respectfully submitted,

/s/ Adam B. Michaels

Adam B. Michaels  
PEPPER HAMILTON, LLP  
620 Eighth Avenue  
37<sup>th</sup> Floor  
New York, NY 10018-1405  
[michaelsa@pepperlaw.com](mailto:michaelsa@pepperlaw.com)  
Tel: (212) 808-2700  
Fax: (212) 286-9806

Jeremy D. Frey (*Pro hac vice*)  
PEPPER HAMILTON, LLP  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799  
[frej@pepperlaw.com](mailto:frej@pepperlaw.com)  
Tel: (215) 981.4445  
Fax: (866) 422.3552

*Attorneys for MAS, Inc.*

Dated: November 15, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of November, 2012, I electronically filed the forgoing Notice of Motion with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the parties of record.

/s/ Adam B. Michaels  
Adam B. Michaels  
PEPPER HAMILTON, LLP  
620 Eighth Avenue  
37<sup>th</sup> Floor  
New York, NY 10018-1405  
[michaelsa@pepperlaw.com](mailto:michaelsa@pepperlaw.com)  
Tel: (212) 808-2700  
Fax: (212) 286-9806

*Attorneys for MAS, Inc.*