

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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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. :
 :
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STIPULATION

11 Civ. 2564 (LBS)

WHEREAS, on or about April 14, 2011, a verified complaint, 11 Civ. 2564 (LBS) (the "Complaint") was filed under seal in the United States District Court for the Southern District of New York seeking the forfeiture of, among other things, all assets of PokerStars, the Oldford Group Ltd., Rational Entertainment Enterprises Ltd., PYR Software Ltd., Stelekram Ltd., and Spheue International Ltd. (collectively the "PokerStars Companies," their assets collectively the "PokerStars Defendant Property") and all assets of Full Tilt Poker, Tiltware LLC, Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco, Ltd., Vantage Ltd., Ranston, Ltd., and Full Tilt Poker Ltd. (collectively the "Named Full Tilt Companies," their assets collectively the "Full Tilt Defendant Property") pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), and seeking civil money

laundering penalties pursuant to Title 18, United States Code, Section 1956 against the PokerStars Companies and against the Named Full Tilt Companies;

WHEREAS, on or about September 21, 2011, a verified amended complaint (the "Amended Complaint") was filed;

WHEREAS, on or about September 30, 2011, Cardroom International LLC ("Cardroom") filed a claim pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a), asserting an interest in the following property identified in the above-captioned case in the amount of thirty million dollars, which is comprised of the following:

- a) All funds and other property on deposit and/or formerly on deposit in account numbered GB81 RBOS 6095 4234 0877 66 held at NatWest, in the name of Raymond Bitar, and all funds traceable thereto;
- b) All funds and other property on deposit and/or formerly on deposit in account numbered 7655741861 held at Wells Fargo Bank N.A. in the name of HH Lederer Consulting LLC, and all funds traceable thereto;
- c) All funds and other property on deposit and/or formerly on deposit in account numbered GB56LOYD30166314010402 held at Loyds TSB International, Isle of Mann, in the name of Howard Lederer, and all funds traceable thereto;
- d) All funds and other property on deposit and/or formerly on deposit in account numbered 40039049628 held at Citibank N.A., in the name of Chris Ferguson, and all funds traceable thereto;
- e) All funds and other property on deposit and/or formerly on deposit in account numbered CH87 0875 5057 0684 0010 0 held at Pictet & Co Bankers, Switzerland, in the name of Telamonian Ajax Trust,

and all funds traceable thereto;

- f) All other property that has been seized or will be seized in this proceeding at any time, directly from and/or related to, a) defendant Pokerstars and any related defendant(s) and, b) defendant Full Tilt Poker and any related defendant(s), pursuant to the Complaint filed in this matter, 11 Civ. 2564 (LBS) on April 20, 2011 and the First Amended Complaint filed in this matter, 11 Civ. 2564 (LBS) on September 21, 2011; and
- g) All funds identified in the original forfeiture complaint in this action unsealed on April 15, 2011 to the extent such funds are traceable to the activities of the pokerstars.com and fulltiltpoker.com internet cardroom, but no claim is made to the extent the funds are traceable to the absolutepoker.com internet cardroom;

WHEREAS, the United States has entered into a Stipulation and Order of Settlement Regarding Full Tilt Poker (the "Full Tilt Settlement") and a Stipulation and Order of Settlement Regarding PokerStars (the "PokerStars Settlement"), which provide for, inter alia, the forfeiture of certain assets of the Full Tilt Group (defined in the Full Tilt Settlement) and the transfer of those assets to the PokerStars Companies (defined in the PokerStars Settlement) or their designees;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, Sharon Cohen Levin, Michael D. Lockard, and Jason H. Cowley Assistant United States Attorneys, of counsel, and Cardroom International LLC, by their attorneys, Cyrus Sanai, Esq. and Robert J Hantman, Hantman & Associates, that:

1. Cardroom International LLC ("Cardroom") consents to the forfeiture of certain assets of the Full Tilt Group (the "Forfeited Full Tilt Assets") as part of the settlement reached between the United States and Fulltilt Poker and PokerStars in United States v. PokerStars, et al., 11 Civ. 2564 (LBS) (the "SDNY Action"), on the terms and conditions herein stated.

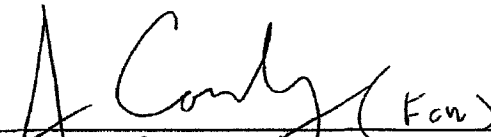
2. The U.S. Attorney's Office for the Southern District of New York (the "Office") agrees to hold \$30,000,000 in funds received by the United States in connection with the settlement with the Full Tilt Group and the PokerStars Companies (the "Substitute Res") as substitute res for the Forfeited Full Tilt Assets subject to Cardroom's claim.

3. The Substitute Res shall be treated in this action as a substitute res for the Forfeited Full Tilt Assets, without prejudice to any rights, remedies, claims, defenses, or arguments of either party in this action.

4. The signature pages of this stipulation may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument. Signature pages by fax or by .pdf shall be treated as originals.

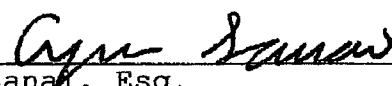
AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney
Southern District of New York


By:  (Fon)
Sharon Cohen Levin
Michael D. Lockard
Jason H. Cowley
Assistant United States Attorneys
One St. Andrew's Plaza
New York, New York 10007
(212) 637-1060/2193/2479

7/27/12
DATE

Counsel for Cardroom International LLC

By: 
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(310) 717-9840
Counsel for Cardroom International LLC

July 27, 2012
DATE

By: 
Robert J Hantman
Hantman & Associates
1515 Broadway, 11th Floor
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(212) 684-3933
Counsel for Cardroom International LLC

7/27/12
DATE