

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK
 - - - - - x
 -
 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. :

 - - - - - x

STIPULATION AND ORDER
 OF DISMISSAL IN REGARD
 TO THE CLAIM OF
 AVOINE - SERVICIO DE
 CONSULTADORIA E
MARKETING, LDA

11 Civ. 2564 (KMW)

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 certain property pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C);

WHEREAS, included in such property were all assets of the following entities, collectively doing business as Absolute Poker:

1. Absolute Poker;
2. Ultimate Bet;
3. SGS Systems Inc.;

4. Trust Services Ltd.;
5. Fiducia Exchange Ltd.;
6. Blue Water Services Ltd.;
7. Absolute Entertainment, S.A; and Blanca Games, Inc. of Antigua

(collectively, the "Absolute Poker Companies," and the assets of the Absolute Poker Companies, the "Defendant Property").

WHEREAS, beginning on May 17, 2011, and for thirty consecutive days thereafter, pursuant to Rule G(4)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, plaintiff United States of America posted notice of the Verified Complaint against the defendants-in-rem, on www.forfeiture.gov, the government internet site, and proof of publication was filed with the Clerk of the Court on November 22, 2011;

WHEREAS, on or about September 21, 2011, a verified amended complaint in this action was filed seeking the forfeiture of, inter alia, the Defendant Domains;

WHEREAS, on or about January 5, 2012, Avoine - Servico De Consultadoria E Marketing, Lda ("Avoine" or "Claimant") filed a verified claim asserting an ownership interest in the Defendant Property or a portion thereof;

WHEREAS, on or about September 10, 2012, a verified second amended complaint (the "Amended Complaint") in this

action was filed seeking the forfeiture of, inter alia, the Defendant Property;

WHEREAS, the Government and the Claimant have agreed to resolve this matter; therefore

IT IS HEREBY STIPULATED, ORDERED AND AGREED, by and between Plaintiff United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorneys, Sharon Cohen Levin, Michael D. Lockard, Jason H. Cowley, and Christine I. Magdo, of counsel, and Claimant, by its counsel, Leonard A. Rodes, that:

1. The claim of Avoine is hereby dismissed with prejudice, without leave to file any new or additional claims in this action in regard to the Defendant Property.

2. Avoine is hereby barred from asserting any claim against the United States or any of its agents and employees (including, without limitation, the Federal Bureau of Investigation ("FBI") and the United States Attorney's Office for the Southern District of New York ("USAO-SDNY")) in connection with or arising out of the United States' seizure, restraint, and/or constructive possession of the Defendant Property, including, without limitation, any claim that the United States did not have probable cause to seize and/or forfeit the Defendant Property, that the Claimant is a

prevailing party or that the Claimant is entitled to attorneys' fees or any award of interest.

3. This Stipulation and Order is without prejudice to any claims of the Claimant, or its right or ability to take legal action based on such claims, against any person or entity other than United States (or any of its agents and employees) relating to the facts and allegations set forth in (1) the Amended Complaint or (2) Avoine's claim or answer filed in this action.

4. Avoine is expressly prohibited from taking any action or making any motion seeking to collaterally attack the seizure, restraint, or forfeiture of the Defendant Property. Furthermore, the parties hereby waive all rights to appeal or to otherwise challenge or contest the validity of this Stipulation and Order.

5. This Stipulation and Order is without prejudice to the Claimant's right or ability to file a petition for remission relating to the Defendant Property. This Stipulation and Order does not constitute a recommendation that any such petition should either be granted or denied.

6. In relation to the allegations set forth in the Amended Complaint, the United States shall not bring any claims against Claimant or Thomas Steen Brandi, who was appointed as sole director and chairman of Avoine pursuant to bankruptcy

proceedings relating to Avoine's parent company that have been initiated in Norway.

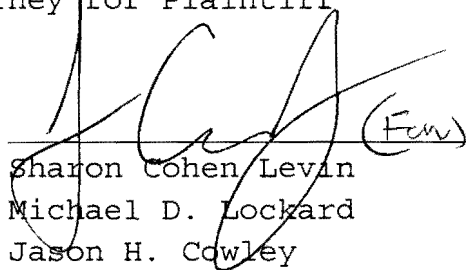
7. Each party shall bear its own costs and attorneys' fees.

8. The signature pages of this Stipulation and Order 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 may be by fax and such signatures shall be deemed as valid originals.

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

By:

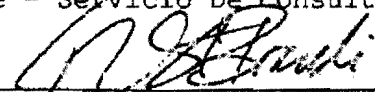
 (FCW)

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Michael D. Lockard
Jason H. Cowley
Christine I. Magdo
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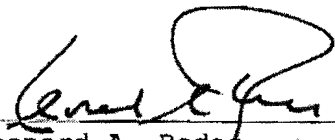
5/22/13
DATE

[ADDITIONAL SIGNATURES ON FOLLOWING PAGE]

Avoine - Servicio De Consultadoria E Marketing, Lda


By: 
Thomas Steen Brandi

27 May 2013
DATE

By: 
Leonard A. Rodes
Trachtenberg Rodes & Friedberg LLP
545 Fifth Avenue
New York, NY 10017
(212) 972-2929

5/28/13
DATE

SO ORDERED:


THE HONORABLE KIMBA W. WOOD
UNITED STATES DISTRICT JUDGE

6-3-13
DATE