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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

Plaintiff, :

11 Civ. 2564 (LBS)

- v. - :

POKERSTARS, FULL TILT POKER, :
 ABSOLUTE POKER, ULTIMATE BET, et :
 al., :

Defendants; :

ALL RIGHT, TITLE AND INTEREST IN :
 THE ASSETS OF POKERSTARS, FULL :
 TILT POKER, ABSOLUTE POKER, :
 ULTIMATE BET, et al., :

Defendants-in-rem. :

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Michael D. Lockard in Support of Government's Motion For Leave To File An Amended Complaint, together with the exhibits thereto, the Government's Memorandum of Law in Support of its Motion For Leave To File An Amended Complaint, and upon all papers and prior proceedings herein, the United States of America will move before the Honorable Leonard B. Sand, United States District Judge for

the Southern District of New York, at such time as the Court shall direct, for an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, granting leave to file the Amended Complaint, attached as Exhibit A to the Declaration of Michael D. Lockard, and such other relief as the Court may determine to be just and proper.

Dated: New York, New York
 September 19, 2011

Respectfully submitted,

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

By: _____/s/
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To: All counsel