

PREET BHARARA
 United States Attorney for the
 Southern District of New York
 By: SHARON COHEN LEVIN
 MICHAEL D. LOCKARD
 JASON H. COWLEY
 Assistant United States Attorneys
 One St. Andrew's Plaza
 New York, New York 10007
 Telephone: (212) 637-1060/2193/2479

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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**DECLARATION OF MICHAEL D. LOCKARD IN SUPPORT OF
 THE GOVERNMENT'S MOTION FOR LEAVE TO FILE AND AMENDED COMPLAINT**

SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL D. LOCKARD, pursuant to Title 28, United States
 Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the
 Office of Preet Bharara, United States Attorney for the Southern
 District of New York. I submit this declaration in support of

the Government's motion for for an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, granting leave to file an Amended Complaint

2. Attached hereto as Exhibit A is a true and correct copy of a proposed First Amended Verified Complaint.

3. Attached hereto as Exhibit B is a true and correct copy of a proposed Order granting leave to file the First Amended Verified Complaint.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 19, 2011, at New York, New York.

/s/
Michael D. Lockard
Assistant United States Attorney
Southern District of New York