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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. :

-----x

STIPULATION AND ORDER

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 certain properties (the "Subject 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, *inter alia*, PokerStars, Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Pyr Software Ltd., Stelekram Ltd., and Spheue International Ltd. (collectively, the "PokerStars Companies");

WHEREAS, on or about May 27, 2011, the United States provided notice of the filing of the Complaint to the PokerStars Companies by and through their counsel, David M. Zornow, Esq. of Skadden, Arps, Slate, Meagher & Flom LLP;

WHEREAS, on or about July 5, 2011, the PokerStars Companies¹ waived service of the Complaint and Summons;

WHEREAS, on or about September 22, 2011, a verified amended complaint in this action (the "Amended Complaint") was filed seeking the forfeiture of the Subject Property and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against the PokerStars Companies;

WHEREAS, the PokerStars Companies have requested additional time to file claims for the Subject Property and to answer or otherwise respond to the Amended Complaint;

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, Jason H. Cowley, Assistant United States Attorney, of counsel, and the PokerStars Companies, by their attorney, David M. Zornow, Esq., of Skadden, Arps, Slate, Meagher & Flom LLP, that:

1. The PokerStars Companies shall have until October 31, 2011, to (a) file claims pursuant to Rule G of the Supplemental Rules for Certain Admiralty and Maritime Claims for any or all of the Subject Property and (b) answer or otherwise respond to the Amended Complaint.

¹ Pyr Software Ltd. waived service of the Complaint and Summons on July 4, 2011.

2. This Order is without prejudice to any rights, remedies, claims, or defenses of any of the parties hereto.

3 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
Southern District of New York

By: Jason H. Cowley
Jason H. Cowley
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
(212) 637-2193

9/28/11
DATE

POKERSTARS, OLDFORD GROUP LTD., RATIONAL ENTERTAINMENT ENTERPRISES LTD., PYR SOFTWARE LTD., STELEKRAM LTD., and SPHENE INTERNATIONAL LTD.

By: David M. Zornow
David M. Zornow, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036
(212) 735-2890

9/28/11
DATE

Counsel for PokerStars, Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Pyr Software Ltd., Stelekram Ltd., and Sphene International Ltd.

SO ORDERED:

Leonard B. Sand
HONORABLE LEONARD B. SAND
UNITED STATES DISTRICT JUDGE

9/29/11
DATE