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DATE FILED: 11-1-11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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.

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 PokerStars and others;

WHEREAS, on or about June 21, 2011, claimant MAS, Inc., filed a Verified Claim asserting an ownership interest in All Funds Formerly On Deposit at Hawaii National Bank, Honolulu, Hawaii, in Account Number 12008656, Held in the Name of MAS, Inc.;

WHEREAS, on or about June 21, 2011, claimant Ultra Safe Pay, LLC filed a Verified Claim asserting an ownership interest

in All Funds Formerly On Deposit at UMPQUA Bank, Roseburg, Oregon, in Account Number 972402309, Held in the Name of Ultra Safe Pay;

WHEREAS, on or about September 21, 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 MAS, Inc and Ultra Safe Pay LLC;

WHEREAS, MAS, Inc. and Ultra Safe Pay LLC each has requested additional time to answer or otherwise respond to the 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 MAS, Inc. and Ultra Safe Pay, LLC, by their attorney, Adam B. Michaels, Esq. and Jeremy D. Frey, Esq., of Pepper Hamilton LLP, that:

1. MAS, Inc. and Ultra Safe Pay, LLC each shall have until November 30, 2011, to answer or otherwise respond to the Amended Complaint.

2. 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
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
(212) 637-2479

10/31/11
DATE

MAS INC. and ULTRA SAFE PAY, LLC

By: 

Adam B. Michaels, Esq.
Pepper Hamilton LLC
The New York Times Building
620 Eighth Avenue
New York, New York 10018-1405
(212) 808-2700

10/31/11
DATE

Jeremy D. Frey, Esq. (pro hac vice pending)
Pepper Hamilton LLP
3000 Two Logan Square
18th and Arch Streets
Philadelphia, Pennsylvania 19103
(215) 981-4000

Counsel for MAS Inc. and Ultra Safe Pay, LLC

SO ORDERED:


HONORABLE LEONARD B. SAND
UNITED STATES DISTRICT JUDGE

11/1/2011
DATE