

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

STEVE SEGAL, NICK HAMMER, ROBIN HOUGDAHL, and TODD TERRY, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK; FULL TILT POKER, LTD.; TILTWARE, LLC; VANTAGE, LTD; FILCO, LTD; KOLYMA CORP. A.V.V.;POCKET KINGS LTD.; POCKET KINGS CONSULTING LTD.; RANSTON LTD.; MAIL MEDIA LTD.; HOWARD LEDERER; PHILLIP IVEY JR.; CHRISTOPHER FERGUSON; JOHNSON JUANDA; JENNIFER HARMAN-TRANIELLO; PHILLIP GORDON; ERICK LINDGREN; ERIK SEIDEL; ANDREW BLOCH; MIKE MATUSOW; GUS HANSEN; ALLEN CUNNINGHAM; PATRIK ANTONIUS and JOHN DOES 1-100,

Defendants.

No. 11-CV-4521 (LBS)

DEFENDANT PHILLIP IVEY JR.'S SPECIAL APPEARANCE AND NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT

PLEASE TAKE NOTICE that Defendant, PHILLIP IVEY JR., respectfully submits his Motion to Dismiss Plaintiffs' Complaint.

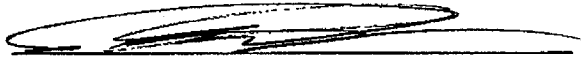
Specifically, Defendant moves to dismiss Plaintiffs' Complaint in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction and Rule 12(b)(6) for failure to state a claim upon which relief can be granted for Conversion.

The grounds for Defendant's Motion to Dismiss Plaintiffs' Complaint are more fully set forth in the accompanying Memorandum of Law filed contemporaneously herewith.

**DATED:** September 15<sup>th</sup>, 2011.

Respectfully submitted,

**CHESNOFF & SCHONFELD**



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Nevada Bar No. 2292

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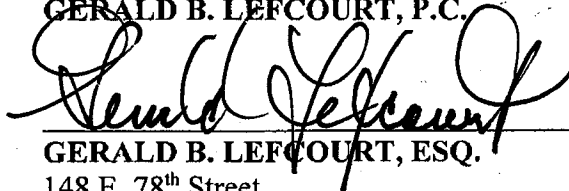
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