

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) No. 4:06CR00337 CEJ
)
 BETONSPORTS PLC,)
)
 Defendant.)

MOTION FOR CONTINUANCE OF SENTENCE HEARING

Comes now Defendant BetOnSports PLC (“BOS”) and moves this Honorable Court for a continuance of the sentencing hearing in this matter currently set for October 19, 2007.

As the basis for the instant motion, Defendant states as follows:

1. In the last thirty (30) days the liquidators located in London, UK who are handling the ongoing liquidation of BOS were asked by the Government of Antigua to handle the liquidation of BOS Antigua (“BOS-A”) as well. This Court may recall that it was not anticipated that BOS-A would be the source for funds available for possible restitution to U.S. customers in view of an Antiguan Court Order barring the removal or conveyance of any such funds from Antigua. That Order has now been lifted by the Government of Antigua and the same liquidators working on the UK liquidation have been requested to liquidate the Antigua assets.

2. This creates the possibility that funds may be collected from debtors of BOS-A which then could be used to repay some or all of the United States customers at least a portion of their claims.

3. However, in speaking to the counsel for the liquidators they advise that the process of collection in Antigua as well as the contacting of creditors and verification of their

claims will take some time before it will be determined the amount of funds collected as well as the amount of such funds which may be used to pay customer claims.

4. Of course, this entire procedure also closely relates to ongoing compliance by BOS with the restitution provision of the Permanent Injunction pending in this matter's companion civil case also on file with this Court.

5. Therefore, the United States Probation Office as well as the United States Attorney's Office agree with the Defendant that a continuance is in order such that this process may be undertaken. The liquidators and their counsel have advised the undersigned that a period of 8-12 months should be expected before this process may reach a stage at which time they will know the status of recovery of funds and the amounts available for repayment.

6. The undersigned also offers, and the Government and Probation Office agree, to submit to this Court status reports every sixty (60) days in the interim so that this Court may be kept apprised of developments as they occur.

WHEREFORE, it is requested that this Court grant a continuance in the sentencing hearing in this matter of at least eight (8) and no more than twelve (12) months from the date of the current hearing set for October 19, 2007.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2007 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing systems and/or sent via email upon the following:

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