

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
LAWRENCE S. BADER
BENJAMIN S. FISCHER
CATHERINE M. FOTI
PAUL R. GRAND
LAWRENCE IASON
BRIAN A. JACOBS
JUDITH L. MOGUL
JODI MISHNER PEIKIN
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

bfischer@maglaw.com
(212) 880-9585

COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
DANIEL F. WACHTELL
ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG
1940-2002
JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

March 2, 2017

VIA CM/ECF

The Honorable Dora L. Irizarry
Chief Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Securities and Exchange Commission v. Platinum Management (NY) LLC, et al.*, No. 1:16-cv-06848-DLI-VMS

Dear Chief Judge Irizarry:

We represent Defendant Joseph Mann in the above-referenced matter. We write on behalf of all Defendants to respectfully request permission to extend the time for the Defendants to answer, move with respect to, or otherwise respond to the Complaint in this action until 30 days after the Court rules on the Government's Motion for Leave to Intervene and to Stay Civil Proceedings (Dkt. No. 42), and if the Court grants the Government's request for a complete stay, until 30 days after such stay is lifted. The current time for the Defendants to answer the Complaint is by March 7, 2017.

All of the Defendants and the Plaintiff Securities and Exchange Commission consent to this proposed extension. This is the first request for an extension of time for the Defendants to answer, move with respect to, or otherwise respond to the Complaint.

Respectfully submitted,

/s/

Benjamin S. Fischer

cc: All Counsel of Record (Via CM/ECF)