

AO 441 (Rev. 07/10) Summons on Third-Party Complaint

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Melanie L. Cyganowski
Plaintiff
Washington National Insurance Co., Bankers Conseco Life Insurance Co., et al.
Defendant, Third-party plaintiff
v.
Mark Nordlicht, et al.
Third-party defendant
Civil Action No. 18-cv-12018
CONSOLIDATED CASE NO. 18-cv-6658
SEE ATTACHED RIDER FOR FULL CASE CAPTIONS

AMENDED SUMMONS ON A THIRD-PARTY COMPLAINT

To: (Third-party defendant's name and address) SEE ATTACHED RIDER

A lawsuit has been filed against defendant Washington National Insurance Co., Bankers Conseco Life Insurance Co., who as third-party plaintiff is making this claim against you to pay part or all of what the defendant may owe to the plaintiff Melanie L. Cyganowski.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff and on the defendant an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the defendant or defendant's attorney, whose name and address are:

Adam J. Kaiser
Alston & Bird LLP
90 Park Avenue, New York, NY 10016

It must also be served on the plaintiff or plaintiff's attorney, whose name and address are:

Adam Silverstein, Otterbourg P.C., 230 Park Avenue, New York, NY 10169

If you fail to respond, judgment by default will be entered against you for the relief demanded in the third-party complaint. You also must file the answer or motion with the court and serve it on any other parties.

A copy of the plaintiff's complaint is also attached. You may – but are not required to – respond to it.

Date: \_\_\_\_\_

CLERK OF COURT

Signature of Clerk or Deputy Clerk

Civil Action No. 18-cv-12018

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify):* \_\_\_\_\_  
 \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As...**

**Add Attachment**

**Reset**



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MARTIN TROTT and CHRISTOPHER )  
SMITH, as Joint Official Liquidators and )  
Foreign Representatives of PLATINUM )  
PARTNERS VALUE ARBITRAGE FUND )  
L.P. (in Official Liquidation) and )  
PLATINUM PARTNERS VALUE )  
ARBITRAGE FUND L.P. (in Official )  
Liquidation), )

18-cv-10936 (JSR)

Plaintiffs, )

v. )

PLATINUM MANAGEMENT (NY) LLC, )  
MARK NORDLICHT, DAVID LEVY, )  
ESTATE OF URI LANDESMAN, )  
MURRAY HUBERFELD, DAVID )  
BODNER, DANIEL SMALL, JOSEPH )  
SANFILIPPO, DAVID OTTENSOSER, )  
BERNARD FUCHS, MICHAEL )  
NORDLICHT, MICHAEL KATZ, KEVIN )  
CASSIDY, SETH GERSZBERG, EZRA )  
BEREN, NAFTALI MANELA, DANIEL )  
SAKS, MOSHE M. FEUER a/k/a MARK )  
FEUER, SCOTT TAYLOR, DHURUV )  
NARAIN, PLATINUM PARTNERS )  
BLACK ELK OPPORTUNITIES FUND )  
LLC, PLATINUM PARTNERS BLACK )  
ELK OPPORTUNITIES FUND )  
INTERNATIONAL LTD., MORRIS )  
FUCHS, LEON MYERS, MN )  
CONSULTING NY LLC, ESTATE OF )  
JULES NORDLICHT, ESTATE OF )  
SOLOMON ENGLANDER, ESTATE OF )  
GERTRUDE ENGLANDER, ROCKWELL )  
FULTON CAPITAL, DITMAS PARK )  
CAPITAL L.P., PLATINUM F.I. GROUP, )  
LLC, FCBA TRUST, AARON PARNES, )  
SARAH PARNES, SHMUEL FUCHS )  
FOUNDATION, SOLOMON WEDIGER, )  
OLIVE TREE HOLDINGS, LLC, )  
MERIDIAN CAPITAL FOUNDATION, )  
HUANG LAI TSU HSIA, HUBERFELD )  
FAMILY FOUNDATION, MIND, BODY )  
AND SOUL CO. LIMITED, TWOSONS )  
CORPORATION, GRD ESTATES LTD., B )

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ASSET MANAGER LP, B ASSET )  
MANAGER II LP, BEECHWOOD RE )  
INVESTMENTS, LLC, BEECHWOOD RE )  
HOLDINGS, INC., BEECHWOOD RE )  
LTD., BEECHWOOD BERMUDA )  
INTERNATIONAL LTD., BAM )  
ADMINISTRATIVE SERVICES LLC, )  
ILLUMIN CAPITAL MANAGEMENT LP, )  
BRE BCLIC PRIMARY, BRE BCLIC SUB, )  
BRE WNIC 2013 LTC PRIMARY, BRE )  
WNIC LTC SUB, BBIL ULICO 2014 )  
TRUST, BEECHWOOD TRUST NO. 1, )  
BEECHWOOD TRUST NO. 2, )  
BEECHWOOD TRUST NO. 3, )  
BEECHWOOD TRUST NO. 4, )  
BEECHWOOD TRUST NO. 5, )  
BEECHWOOD TRUST NO. 6, )  
BEECHWOOD TRUST NO. 15, )  
BEECHWOOD TRUST NO. 16, )  
BEECHWOOD TRUST NO. 17, )  
BEECHWOOD TRUST NO. 18, )  
BEECHWOOD TRUST NO. 19, )  
BEECHWOOD TRUST NO. 20, )  
BEECHWOOD RE INVESTMENTS, LLC )  
SERIES A, BEECHWOOD RE )  
INVESTMENTS, LLC SERIES B, )  
BEECHWOOD RE INVESTMENTS, LLC )  
SERIES C, BEECHWOOD RE )  
INVESTMENTS, LLC SERIES D, )  
BEECHWOOD RE INVESTMENTS, LLC )  
SERIES E, BEECHWOOD RE )  
INVESTMENTS, LLC SERIES F, )  
BEECHWOOD RE INVESTMENTS, LLC )  
SERIES G, BEECHWOOD RE )  
INVESTMENTS, LLC SERIES H, )  
BEECHWOOD RE INVESTMENTS, LLC )  
SERIES I, JOHN DOES 1-100, MEADOWS )  
CAPITAL LLC, ABRAHAM C. )  
GROSSMAN, DAVID GICHTIN, ORA )  
GICHTIN, GOLDA WILK, THE ESTATE )  
OF MARCOS KATZ, ADELA KATZ, )  
ROCKWELL FULTON CAPITAL, L.P. )  
)  
Defendants. )

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MELANIE L. CYGANOWSKI, as Equity )  
Receiver for PLATINUM PARTNERS )  
CREDIT OPPORTUNITIES MASTER )  
FUND LP, PLATINUM PARTNERS )  
CREDIT OPPORTUNITIES FUND (TE) )  
LLC, PLATINUM PARTNERS CREDIT )  
OPPORTUNITIES FUND LLC, )  
PLATINUM PARTNERS CREDIT )  
OPPORTUNITIES FUND )  
INTERNATIONAL LTD., PLATINUM )  
PARTNERS CREDIT OPPORTUNITIES )  
FUND INTERNATIONAL (A) LTD., and )  
PLATINUM PARTNERS CREDIT )  
OPPORTUNITIES FUND (BL) LLC, )

18-cv-12018 (JSR)

Plaintiffs, )

v. )

BEECHWOOD RE LTD., BEECHWOOD )  
RE INVESTMENTS, LLC, B ASSET )  
MANAGER LP, B ASSET MANAGER II )  
LP, BEECHWOOD RE HOLDINGS, INC., )  
BEECHWOOD BERMUDA )  
INTERNATIONAL, LTD., BEECHWOOD )  
BERMUDA LTD., BAM )  
ADMINISTRATIVE SERVICES LLC, BRE )  
BCLIC 2013 LTC PRIMARY, BRE BCLIC )  
2013 LTC SUB, BRE WNIC 2013 LTC )  
PRIMARY, BRE WNIC 2013 LTC SUB, )  
MOSHE M. FEUER a/k/a MARK FEUER, )  
FEUER FAMILY TRUST, TAYLOR-LAU )  
FAMILY TRUST, SCOTT A. TAYLOR, )  
SENIOR HEALTH INSURANCE )  
COMPANY OF PENNSYLVANIA, )  
FUZION ANALYSTICS, INC., BANKERS )  
CONSECO LIFE INSURANCE )  
COMPANY, WASHINGTON NATIONAL )  
INSURANCE COMPANY, CNO )  
FINANCIAL GROUP, INC. 40/86 )  
ADVISORS, INC., JOHN DOES 1-100, )

Defendants. )

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WASHINGTON NATIONAL INSURANCE )  
COMPANY and BANKERS CONSECO )  
LIFE INSURANCE COMPANY, )  
 )  
Cross-Claim Plaintiffs, )  
 )  
v. )  
 )  
MOSHE M. FEUER a/k/a MARK FEUER, )  
FEUER FAMILY TRUST, SCOTT A. )  
TAYLOR, TAYLOR-LAU FAMILY )  
TRUST, BEECHWOOD RE LTD, )  
BEECHWOOD RE HOLDINGS, INC., )  
B ASSET MANAGER LP, BAM )  
ADMINISTRATIVE SERVICES LLC, )  
BEECHWOOD BERMUDA LTD., )  
BEECHWOOD BERMUDA )  
INTERNATIONAL, LTD., )  
 )  
Cross-Claim Defendants. )  
 )  

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WASHINGTON NATIONAL INSURANCE )  
COMPANY and BANKERS CONSECO )  
LIFE INSURANCE COMPANY, )  
)  
Third-Party Plaintiffs, )  
)  
v. )  
)  
MARK NORDLICHT, MURRAY )  
HUBERFELD, DAVID BODNER, )  
DAVID LEVY, RICK HODGDON, WILL )  
SLOTA, DANIEL SMALL, DAVID LEFF, )  
NAFTALI MANELA, DAVID )  
OTTENSOSER, HOKYONG KIM a/k/a )  
STEWART KIM, DANIEL SAKS a/k/a )  
DANNY SAKS, PAUL POTEAT, DHRUV )  
NARAIN, BEECHWOOD CAPITAL )  
GROUP, LLC, PB INVESTMENT )  
HOLDINGS LTD., BEECHWOOD RE )  
INVESTMENTS, LLC, SERIES A, )  
BEECHWOOD RE INVESTMENTS, LLC, )  
SERIES B, BEECHWOOD RE )  
INVESTMENTS, LLC, SERIES C, )  
BEECHWOOD RE INVESTMENTS, LLC, )  
SERIES D, BEECHWOOD RE )  
INVESTMENTS, LLC, SERIES E, )  
BEECHWOOD RE INVESTMENTS, LLC, )  
SERIES F, BEECHWOOD RE )  
INVESTMENTS, LLC, SERIES G, )  
BEECHWOOD RE INVESTMENTS, LLC, )  
SERIES H, BEECHWOOD RE )  
INVESTMENTS, LLC, SERIES I, )  
BEECHWOOD TRUST NO. 1, )  
BEECHWOOD TRUST NO. 2, )  
BEECHWOOD TRUST NO. 3, )  
BEECHWOOD TRUST NO. 4, )  
BEECHWOOD TRUST NO. 5, )  
BEECHWOOD TRUST NO. 6, )  
BEECHWOOD TRUST NO. 7, )  
BEECHWOOD TRUST NO. 8, )  
BEECHWOOD TRUST NO. 9, )  
BEECHWOOD TRUST NO. 10, )  
BEECHWOOD TRUST NO. 11, )  
BEECHWOOD TRUST NO. 12, )  
BEECHWOOD TRUST NO. 13, )  
BEECHWOOD TRUST NO. 14, )

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BEECHWOOD TRUST NO. 15, )  
BEECHWOOD TRUST NO. 16, )  
BEECHWOOD TRUST NO. 17, )  
BEECHWOOD TRUST NO. 18, )  
BEECHWOOD TRUST NO. 19, )  
BEECHWOOD TRUST NO. 20, )  
and LINCOLN INTERNATIONAL LLC, )  
 )  
Third-Party Defendants. )

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**Beechwood Re Investments, LLC**

*On Behalf of:*

*Beechwood Re Investments, LLC Series A*

*Beechwood Re Investments, LLC Series B*

*Beechwood Re Investments, LLC Series C*

*Beechwood Re Investments, LLC Series D*

*Beechwood Re Investments, LLC Series E*

*Beechwood Re Investments, LLC Series F*

*Beechwood Re Investments, LLC Series G*

*Beechwood Re Investments, LLC Series H*

*Beechwood Re Investments, LLC Series I*

c/o Corporation Service Company

251 Little Falls Drive

New Castle, DE 19808