

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

)	
IN RE PLATINUM-BEECHWOOD LITIGATION)	
)	18-cv-6658 (JSR)
)	
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., et al.,)	
)	
Defendants.)	
)	

NOTICE OF MOTION TO CONFIRM ARBITRAL AWARDS

Pursuant to 9 U.S.C. § 9, defendants-crossclaimants Washington National Insurance Company and Bankers Consec Life Insurance Company (collectively, “Movants”) move to confirm arbitral awards granting Movants pre-hearing security pending in the arbitration captioned *Bankers Consec Life Insurance Company and Washington National Insurance Company v. Beechwood Re Limited et al.*, AAA Case No. 01-16-0004-02510. This motion is unopposed and Movants request that the Court enter the form of Order submitted herewith.

Dated: New York, New York
April 23, 2019

ALSTON & BIRD LLP

By: /s/ Adam J. Kaiser

Adam J. Kaiser
John M. Aerni
Daniella P. Main
Jenna C. Polivy
adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com
jenna.polivy@alston.com
ALSTON & BIRD LLP
90 Park Avenue
New York, New York 10016
(212) 210-9400
(212) 210-9444 (fax)