

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

PLATINUM-BEECHWOOD LITIGATION.

Civil Action No. 18-cv-6658 (JSR)

**JOINDER TO SHIP'S
MOTION TO COMPEL**

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-against-

BEECHWOOD RE LTD., et al.,

Defendants.

Civil Action No. 18-cv-06658 (JSR)

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Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (the “JOLs”) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (“PPVA”) respectfully join the Letter Motion and all exhibits thereto submitted in this consolidated action by Senior Health Insurance Company of Pennsylvania (“SHIP”) to compel the production of documents from B Asset Manager, LP, Beechwood Bermuda International Ltd., Beechwood Re (in Official Liquidation), Beechwood Re Investments, LLC, David Levy, Mark Feuer, Scott Taylor, Naftali Manela, and Dhruv Narain, (together, “the Beechwood Defendants”), each of which is a party to the action *Trott v. Platinum Management (NY) LLC et al.*, Civil Action No. 18-cv-10936 (JSR) (the “*Trott Action*”).

Specifically, the documents sought from the Beechwood Defendants, which include documents previously produced by the Beechwood Defendants to the U.S. Securities and Exchange Commission, are relevant to the JOLs and PPVA’s claims in the *Trott Action*, and proportional to

the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Moreover, there is no privilege protecting these documents from disclosure as they were previously produced to the SEC pursuant to a subpoena. *See In re Steinhardt Partners, L.P.*, 9 F.3d 230, 233-36 (2d Cir. 1993).

Dated: April 29, 2019
New York, New York

HOLLAND & KNIGHT LLP

By: 

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Christopher Smith, as Joint Official Liquidators and
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Arbitrage Fund L.P. (in Official Liquidation), and
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