

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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 IN RE PLATINUM-BEECHWOOD LITIGATION :  
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 MELANIE L. CYGANOWSKI, AS RECEIVER, BY :  
 AND FOR PLATINUM PARTNERS CREDIT : Civil Action No. 1:18-cv-06658 (JSR)  
 OPPORTUNITIES MASTER FUND LP, PLATINUM :  
 PARTNERS CREDIT OPPORTUNITIES FUND (TE):  
 LLC, PLATINUM PARTNERS CREDIT : Civil Action No. 1:18-cv-12018 (JSR)  
 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, :

Plaintiffs,

v.

BEECHWOOD RE LTD., BEECHWOOD RE :  
 INVESTMENTS, LLC, B ASSET MANAGER LP, B :  
 ASSET MANAGER II LP, BEECHWOOD RE :  
 HOLDINGS, INC., BEECHWOOD BERMUDA : MOTION FOR ADMISSION PRO  
 INTERNATIONAL, LTD., BEECHWOOD : HAC VICE  
 BERMUDA INVESTMENT HOLDINGS, LTD., :  
 BEECHWOOD BERMUDA LTD., BAM :  
 ADMINISTRATIVE SERVICES LLC, BRE BCLIC :  
 PRIMARY, BRE BCLIC SUB, BRE WNIC 2013 :  
 LTC PRIMARY, BRE WNIC 2013 LTC SUB, :  
 MOSHE M. FEUER a/k/a MARK FEUER, SCOTT A. :  
 TAYLOR, SENIOR HEALTH INSURANCE :  
 COMPANY OF PENNSYLVANIA, FUZION :  
 ANALYTICS, INC., BANKERS CONSECO LIFE :  
 INSURANCE COMPANY, WASHINGTON :  
 NATIONAL INSURANCE COMPANY, CNO :  
 FINANCIAL GROUP, INC., 40|86 ADVISORS, :  
 INC., and JOHNDONES 1-100, :

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, DHURUV :  
NARAIN, BEECHWOOD CAPITAL :  
GROUP, LLC, PB INVESTMENT :  
HOLDINGS LTD., BEECHWOOD RE :  
INVESTMENTS, LLC, SERIES A, :  
BEECHWOOD RE INVESTMENTS, LLC, :  
SERIES 13, 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, :  
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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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**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Charles F. Smith, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as co-counsel for Third-Party Defendant Lincoln International LLC in the above-captioned action.

I am a member in good standing of the bar of the State of Illinois. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: April 30, 2019  
Chicago, Illinois

Respectfully submitted,

/s/ Charles F. Smith

Charles F. Smith

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

155 N. Wacker Drive

Chicago, Illinois

Telephone: (312) 407-0516

Facsimile: (312) 407-8523

charles.smith@skadden.com

*Attorney for Lincoln International LLC.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MELANIE L. CYGANOWSKI, AS RECEIVER, BY :  
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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, :

Civil Action No. 1:18-cv-06658 (JSR)

Civil Action No. 1:18-cv-12018 (JSR)

Plaintiffs,

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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 INVESTMENT HOLDINGS, LTD., :  
BEECHWOOD BERMUDA LTD., BAM :  
ADMINISTRATIVE SERVICES LLC, BRE BCLIC :  
PRIMARY, BRE BCLIC SUB, BRE WNIC 2013 :  
LTC PRIMARY, BRE WNIC 2013 LTC SUB, :  
MOSHE M. FEUER a/k/a MARK FEUER, SCOTT A. :  
TAYLOR, SENIOR HEALTH INSURANCE :  
COMPANY OF PENNSYLVANIA, FUZION :  
ANALYTICS, INC., BANKERS CONSECO LIFE :  
INSURANCE COMPANY, WASHINGTON :  
NATIONAL INSURANCE COMPANY, CNO :  
FINANCIAL GROUP, INC., 40|86 ADVISORS, :  
INC., and JOHNDOES 1-100, :

AFFIDAVIT IN SUPPORT OF  
MOTION FOR ADMISSION PRO  
HAC VICE

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, DHURUV  
NARAIN, BEECHWOOD CAPITAL  
GROUP, LLC, PB INVESTMENT  
HOLDINGS LTD., BEECHWOOD RE  
INVESTMENTS, LLC, SERIES A,  
BEECHWOOD RE INVESTMENTS, LLC,  
SERIES 13, BEECHWOOD RE  
INVESTMENTS, LLC, SERIES C,  
BEECHWOOD RE INVESTMENTS, LLC,  
SERIES D, BEECHWOOD RE  
INVESTMENTS, LLC, SERIES E,  
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INVESTMENTS, LLC, SERIES G,  
BEECHWOOD RE INVESTMENTS, LLC,  
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 and LINCOLN INTERNATIONAL LLC, :  
 :  
 Third-Party Defendants. :  
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**AFFIDAVIT OF CHARLES F. SMITH**  
**IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is Charles F. Smith.
2. I make this affidavit pursuant to Local Rule 1.3 in support of the motion for my admission to appear and practice before this Court in the above-captioned matter as counsel *pro hac vice* for Third-Party Defendant Lincoln International LLC.
3. I am a member in good standing of the bar of the State of Illinois since November 5, 1987.
4. I am an attorney with the law firm Skadden, Arps, Slate, Meagher & Flom LLP. My business address, telephone number, facsimile number, and email address are as follows:

Charles F. Smith  
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
 155 N. Wacker Drive  
 Chicago, Illinois  
 Telephone: (312) 407-0516  
 Facsimile: (312) 407-8523  
 charles.smith@skadden.com

5. I attach a certificate of good standing from the Supreme Court of Illinois, which was issued within thirty days of this filing, as Exhibit 1 to this Affidavit.
6. I have never been convicted of a felony.
7. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
8. I have not been the subject of any prior or pending disciplinary proceedings.

Signed under penalty of perjury this 30<sup>th</sup> day of April, 2019,

Charles R. Smith

Sworn to and subscribed before me this 30<sup>th</sup> day of April, 2019.

*Cassandra R. Hathaway*





# EXHIBIT 1

## **Certificate of Admission To the Bar of Illinois**

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Charles F. Smith, Jr.

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/05/1987 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 19th day of  
April, 2019.



*Carolyn Taft Grosboll*

Clerk,  
Supreme Court of the State of Illinois

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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 HOLDINGS, INC., BEECHWOOD BERMUDA : VICE  
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WASHINGTON NATIONAL INSURANCE :  
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and LINCOLN INTERNATIONAL LLC, :  
: :  
Third-Party Defendants. :  
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**ORDER FOR ADMISSION PRO HAC VICE**

The motion for Charles F. Smith for admission to practice *pro hac vice* in the above-captioned action is **GRANTED**.

Applicant has declared that he is a member in good standing of the bar of the State of Illinois and that his contact information is as follows:

Charles F. Smith  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
155 N. Wacker Drive  
Chicago, Illinois  
Telephone: (312) 407-0516  
Facsimile: (312) 407-8523  
E-mail: charles.smith @skadden.com

Applicant having requested admission *pro hac vice* to appear as co-counsel for Third-Party Defendant Lincoln International LLC in the above-captioned action;

**IT IS HEREBY ORDERED** that Applicant is admitted to practice *pro hac vice* in the above-captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated:

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HONORABLE JED S. RAKOFF  
United States District Judge