

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, DHRUV :
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, :
BEECHWOOD TRUST NO. 3, :
BEECHWOOD TRUST NO. 4, :
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BEECHWOOD TRUST NO. 12, :
BEECHWOOD TRUST NO. 13, :
BEECHWOOD TRUST NO. 14, :

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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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, Lara A. Flath, 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/ Lara A. Flath

Lara A. Flath

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

155 N. Wacker Drive

Chicago, Illinois

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Facsimile: (312) 827-9303

lara.flath@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 :
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LLC, :

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

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Plaintiffs,

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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 :
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MOSHE M. FEUER a/k/a MARK FEUER, SCOTT A. :
TAYLOR, SENIOR HEALTH INSURANCE :
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ANALYTICS, INC., BANKERS CONSECO LIFE :
INSURANCE COMPANY, WASHINGTON :
NATIONAL INSURANCE COMPANY, CNO :
FINANCIAL GROUP, INC., 4086 ADVISORS, :
INC., and JOHNDOES 1-100, :

AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION PRO
HAC VICE

Defendants.

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
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DANNY SAKS, PAUL POTEAT, DHURUV
NARAIN, BEECHWOOD CAPITAL
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HOLDINGS LTD., BEECHWOOD RE
INVESTMENTS, LLC, SERIES A,
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SERIES 13, BEECHWOOD RE
INVESTMENTS, LLC, SERIES C,
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SERIES F, BEECHWOOD RE
INVESTMENTS, LLC, SERIES G,
BEECHWOOD RE INVESTMENTS, LLC,
SERIES H, BEECHWOOD RE
INVESTMENTS, LLC, SERIES I,
BEECHWOOD TRUST NO. 1,
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 and LINCOLN INTERNATIONAL LLC, :
 :
 Third-Party Defendants. :
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AFFIDAVIT OF LARA A. FLATH
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Under oath, I depose and state the following:

1. My name is Lara A. Flath.
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 9, 2006.
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:

 Lara A. Flath
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 155 N. Wacker Drive
 Chicago, Illinois
 Telephone: (312) 407-0749
 Facsimile: (312) 827-9303
 lara.flath@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 30th day of April, 2019,


Lara A. Flath

Sworn to and subscribed before me this 30th 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

Lara Ann Flath

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 11/09/2006 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
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 ASSET MANAGER II LP, BEECHWOOD RE : ORDER FOR ADMISSION PRO HAC
 HOLDINGS, INC., BEECHWOOD BERMUDA : VICE
 INTERNATIONAL, LTD., BEECHWOOD :
 BERMUDA INVESTMENT HOLDINGS, LTD., :
 BEECHWOOD BERMUDA LTD., BAM :
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 PRIMARY, BRE BCLIC SUB, BRE WNIC 2013 :
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WASHINGTON NATIONAL INSURANCE :
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 Third-Party Defendants. :
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ORDER FOR ADMISSION PRO HAC VICE

The motion for Lara A. Flath for admission to practice *pro hac vice* in the above-captioned action is **GRANTED**.

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

Lara A. Flath
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 155 N. Wacker Drive
 Chicago, Illinois
 Telephone: (312) 407-0749
 Facsimile: (312) 827-9303
 E-mail: lara.flath@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:

HONORABLE JED S. RAKOFF
United States District Judge