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Via ECF

May 11, 2017

Magistrate Judge Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *SEC v. Platinum Management (NY) LLC et al.*, Civil Case No. 16-cv-6848 (DLI)(VMS)

Dear Magistrate Judge Scanlon:

We are counsel to Bart M. Schwartz (the "Receiver"), the court-appointed receiver for defendant Platinum Credit Management, L.P. and certain related entities. We write in regard to your Honor's May 1, 2017 order directing that the Receiver file his First Quarterly Status Report under seal.

Because counsel for the individual defendants in this case would have access to the entirety of the First Quarterly Status Report once it is filed under seal, the Receiver has requested that they enter into a stipulated protective order on behalf of themselves and their clients. This stipulation, if agreed to, would prevent the disclosure of any document filed under seal in this case without the recipient first signing an undertaking agreeing to be bound by the protective order's terms.

Counsel for Messrs. Nordlicht, Landesman, SanFilippo, and Shulse have indicated that they and their clients would agree to enter into the protective order proposed by the Receiver. Counsel for Mr. Mann has requested time to propose changes to the proposed protective order. We have yet to hear from counsel for Messrs. Levy and Small.

We are hopeful that the proposed protective order will be agreed to and finalized shortly, and will file the First Quarterly Status Report under seal on ECF at that time. If your Honor prefers, in the interest of time, the Receiver would be willing to submit a motion to file the First Quarterly Status Report *ex parte*.

Respectfully submitted,

/s/ Celia Goldwag Barenholtz
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cc: All counsel of record (via ECF)