## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

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

Plaintiffs,

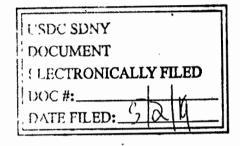
v.

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,

Defendants.

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

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



: ORDER FOR ADMISSION PRO HAC : VICE Case 1:18-cv-06658-JSR Document 304-3 Filed 04/30/19 Page 2 of 4

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, BEECHWOOD TRUST NO. 5, BEECHWOOD TRUST NO. 6, BEECHWOOD TRUST NO. 7, BEECHWOOD TRUST NO. 8, BEECHWOOD TRUST NO. 9, BEECHWOOD TRUST NO. 10, BEECHWOOD TRUST NO. 11, 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.:

#### 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:

5/2/19

HONORABLE JED S. RAKOFF United States District Judge

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

------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 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):

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

Plaintiffs,

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LLC,

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,

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 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, BEECHWOOD TRUST NO. 5, BEECHWOOD TRUST NO. 6, BEECHWOOD TRUST NO. 7, BEECHWOOD TRUST NO. 8, BEECHWOOD TRUST NO. 9, BEECHWOOD TRUST NO. 10, BEECHWOOD TRUST NO. 11, 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.	:
	X

#### 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.

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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
Telephone: (312) 407-0749
Facsimile: (312) 827-9303
lara.flath@skadden.com

Attorney for Lincoln International LLC.

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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 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,

٧.

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,

Defendants.

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

AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

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WASHINGTON NATIONAL INSURANCE
COMPANY and BANKERS CONSECO
LIFE INSURANCE COMPANY,
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Third-Party Plaintiffs,

٧.

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, BEECHWOOD TRUST NO. 5, BEECHWOOD TRUST NO. 6, BEECHWOOD TRUST NO. 7. BEECHWOOD TRUST NO. 8. BEECHWOOD TRUST NO. 9, BEECHWOOD TRUST NO. 10, BEECHWOOD TRUST NO. 11, 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.:

# 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
Esserimile: (312) 827 9303

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.
- 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.

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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

"OFFICIAL SEAL"
CASSANDRAR. HATHAWAY
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 3/24/2020

## 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.

Clerk,

Supreme Court of the State of Illinois

Carolyn Taxt Gosboll