UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION	Master Docket No. 1:18-cv-06658-JSR
MELANIE L. CYGANOWSKI, as Equity Receiver 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., *et al.*, Defendants.	18-cv-12018-JSR **NOTICE OF MOTION TO DISMISS THE THIRD-PARTY COMPLAINT OF BANKERS CONSECO LIFE INSURANCE COMPANY AND WASHINGTON NATIONAL INSURANCE COMPANY**

PLEASE TAKE NOTICE that Third-Party Defendant Murray Huberfeld, upon the accompanying Memorandum of Law, will move, by and through his undersigned counsel, before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 14B, New York, New York 10007, at such date as the Court will determine, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with prejudice the Third-Party Complaint of Bankers Conseco Life Insurance Company and Washington National Insurance Company (ECF No. 204).

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 2(d) of the Individual Rules of Practice before this Court, Huberfeld respectfully sets forth the following in accordance with the Court's April 18, 2019 Order (ECF Doc. No. 253):

- Plaintiffs must file their answering papers (if any) by June 12, 2019;

- Defendants must file their reply papers (if any) by June 26, 2019;

- Oral argument on the group motions to dismiss shall be heard on July 1, 2019 at 10:00 a.m.

Dated: New York, New York
May 15, 2019

Respectfully submitted,

/s/ Jeffrey C. Daniels
Jeffrey C. Daniels, Esq.
Of Counsel to Horowitz and Rubenstein, LLC
4 Carren Circle
Huntington, NY 11743
Tel: (516) 745-5430
jdaniels@cdpc.com

To (via ECF): All counsel of record

2