

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.

18-cv-6658 (JSR)

MARTIN TROTT and CHRISTOPER SMITH,
as Joint Official Liquidators and
Foreign Representatives of
PLATINUM PARTNERS VALUE ARBITRAGE
FUND L.P. (in Official Liquidation) and
PLATINUM PARTNERS VALUE ARBITRAGE
FUND L.P. (in Official Liquidation),

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC,
et al.,

Defendants.

18-cv-10936 (JSR)

NOTICE OF MOTION

PLEASE TAKE NOTICE that 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 First Amended Complaint of Plaintiffs Martin Trott and Christopher Smith, as the Joint Official

Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation).

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 January 24, 2019 Order:

- Plaintiffs must file their answering papers (if any) by February 11, 2019;
- Defendants must file their reply papers by February 15, 2019;
- Oral argument on the group motions to dismiss shall be heard on February 25, 2019 at 3:00 p.m.

Dated: New York, New York
February 4, 2019

Respectfully submitted,

/s/
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