

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

WASHINGTON NATIONAL INSURANCE
COMPANY and BANKERS CONSECO LIFE
INSURANCE COMPANY,

Case No. 18 Civ. 12018 (JSR)

Third-Party Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC,
ET AL.,

Third-Party Defendants.

**NOTICE OF THIRD-PARTY DEFENDANT DANIEL SAKS’
MOTION TO DISMISS THE THIRD-PARTY COMPLAINT**

PLEASE TAKE NOTICE that, in accordance with Federal Rules of Civil Procedure 12(b)(6) and 9(b), Defendant Daniel Saks (“Saks”) hereby respectfully moves this Court, before the Honorable Jed S. Rakoff, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order dismissing the Third-Party Complaint of Washington National Insurance Company and Bankers Consec Life Insurance Company (together, “Plaintiffs”) in its entirety as to Saks (the “Motion”).

PLEASE TAKE FURTHER NOTICE that Plaintiffs' opposition papers to this Motion are due on or before June 12, 2019; Saks' reply, if any, is due on or before June 26, 2019; and the Court shall hear oral argument on July 1, 2019 at 10:00 AM.

Dated: May 15, 2019
New York, NY

BINDER & SCHWARTZ LLP

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