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*Attorney for Defendants 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 Ltd., Bam Administrative Services LLC,  
Mark Feuer, and Scott Taylor*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION	:	
	:	18-cv-06658 (JSR)
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MELANIE L. CYGANOWSKI,	:	
	:	
Plaintiff,	:	18-cv-12018 (JSR)
	:	
-v-	:	
	:	
BEECHWOOD RE LTD., et al.,	:	
	:	
Defendants.	:.....	
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**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Defendants Beechwood Re Ltd. (“BRE”), Beechwood Re Investments, LLC (“BRILLC”), B Asset Manager LP (“BAM”), B Asset Manager II LP (“BAM II”), Beechwood Re Holdings, Inc. (“BRE Holdings ”), Beechwood Bermuda International, Ltd. (“BBIL”), Beechwood Bermuda Ltd. (“BBL”), BAM Administrative Services LLC (“BAM Admin”), Mark Feuer, and Scott Taylor (together, the “Beechwood Parties”), upon the accompanying Memorandum of Law and the Declaration of Ira S. Lipsius (with exhibits),

dated May 14, 2019, will move, by and through their 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)(1) and 12(b)(6) partially dismissing with prejudice the First Amended Complaint by 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 (together, "PPCO") as follows: all non-fraudulent conveyance and declaratory judgment claims against BAM Admin, and all causes of action brought against BRE, BRILLC, BAM, BAM II, BRE Holdings, BBIL, BBL, Mark Feuer, and Scott Taylor.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's April 17, 2019 Order: (1) Plaintiffs must file their answering papers (if any) by June 12, 2019; (2) Defendants must file their reply papers by June 26, 2019; and (3) Oral argument on the motions to dismiss shall be heard on July 1, 2019 at 10:00 a.m.

Dated: May 15, 2019  
Kew Gardens, New York

LIPSIUS BENHAIM LAW LLP

By: /s/ Ira S. Lipsius  
Ira S. Lipsius

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To: All counsel of record (via ECF)