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Attorneys for GRD Estates Ltd.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

Civ. Action No. 18-cv-6658 (JSR)

MARTIN TROTT and CHRISTOPHER 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.

Civ. Action No. 18-cv-10936 (JSR)

DEFENDANT GRD ESTATES LTD.'S NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant GRD Estates Ltd. (“GRD”), by and through its undersigned attorneys, hereby moves this Court in the above-captioned action before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007, for an order dismissing the 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) pursuant to Fed. R. Civ. P. 12(b)(5) for insufficient service of process and Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted (the “Motion”). In accordance with Rule 2(d) of the Individual Rules of Practice before this Court and this Court’s Order in these proceedings dated January 24, 2019 [Doc. No. 158], GRD respectfully sets forth the following:

1. Plaintiffs’ response to the Motion shall be filed on or before **February 11, 2019**;
2. Reply memorandum of GRD shall be filed on or before **February 15, 2019**; and
3. Argument on this motion will be heard on **February 25, 2019 at 3:00 p.m. (ET)**.

Dated: February 4, 2019
New York, New York

Respectfully submitted,

/s/ John D. Penn

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