

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION

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Civil Action No.  
1:18-cv-00658

MELANIE L. CYGANOWSKI, AS RECEIVER,  
BY AND 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,

Civil Action No.  
1:18-cv-12018

*Plaintiffs,*

v.

BEECHWOOD RE LTD., *et al.*,

*Defendants.*

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**NOTICE OF PB INVESTMENT HOLDINGS, LTD.'S  
MOTION TO DIMISS THE THIRD-PARTY COMPLAINT**

PLEASE TAKE NOTICE that Third-Party Defendant PB Investment Holdings, Ltd., as successor-in-interest to Beechwood Bermuda Investment Holdings, Ltd. ("PBIHL"), respectfully moves the Court before the Hon. Jed S. Rakoff, United States District Judge, Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order under Fed. R. Civ. P. 8, 9(b), 12(b)(2) and 12(b)(6) dismissing the Third-Party Complaint [ECF 75] in the action captioned *Cyganowski v. Beechwood Re Ltd., et al.*, 18-cv-12018, in its entirety as to PBIHL.

PLEASE TAKE FURTHER NOTICE that PBIHL relies on the accompanying Memorandum of Law and Declaration of Henry Komansky.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's April 18, 2019 Order, third-party plaintiffs' response, if any, is due on June 12, 2019, and PBIHL's reply, if any, is due on June 26, 2019.

Dated: May 15, 2019

LAW OFFICES OF CHARLES A. GRUEN

By: 

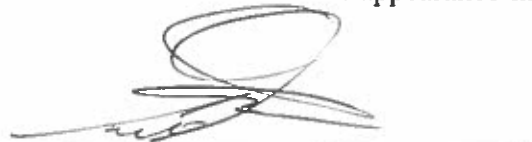
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*(Pro Hac Vice to be filed)*

**CERTIFICATE OF SERVICE**

It is hereby certified that on this 15th day of May 2019, a copy of the foregoing was served through the Court's electronic filing system as to all parties who have entered an appearance in this proceeding.

  
CHARLES A. GRUEN