

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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In re: PLATINUM-BEECHWOOD LITIGATION	: No. 18 Civ. 6658 (JSR)
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MARTIN TROTT and CHRISTOPHER SMITH, as	:
Joint Official Liquidators and Foreign	:
Representatives of PLATINUM PARTNERS VALUE	:
ARBITRAGE FUND L.P. (in OFFICIAL	: No. 18 Civ. 10936 (JSR)
LIQUIDATION) and PLATINUM PARTNERS	:
VALUE ARBITRAGE FUND L.P. (in OFFICIAL	:
LIQUIDATION),	:
	:
Plaintiffs,	: <u>NOTICE OF MOTION AND</u>
	: <u>MOTION TO DISMISS FIRST</u>
v.	: <u>AMENDED COMPLAINT AS TO</u>
	: <u>TWOSONS CORPORATION</u>
	:
PLATINUM MANAGEMENT (NY) LLC, et al.,	: ORAL ARGUMENT REQUESTED
Defendants.	:
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PLEASE TAKE NOTICE that, on February 25, 2019, at 3:00 p.m., Defendant, Twosons Corporation (“Twosons”), will respectfully move (the “Motion”) this Court for entry of an order (the “Order”) pursuant to Federal Rule of Civil Procedure 12 dismissing each of the causes of action alleged against Twosons in the First Amended Complaint (“FAC”) docketed January 23, 2019 (ECF No. 156). Twosons’ Motion is supported by this Notice of Motion, the accompanying Memorandum of Law (the “Twosons Memo”), all exhibits thereto, and all pleadings and evidence otherwise properly before this Court, including the motions filed substantially contemporaneously herewith of the other defendants on the same or similar grounds. Twosons respectfully reserves all

rights to further move to dismiss all causes of action against it on any grounds not presently known.¹

Dated: February 4, 2019

Respectfully Submitted,
/s/ Marc Hirschfield

Marc Hirschfield
Marc Skapof
Barry L. Cohen
Royer Cooper Cohen Braunfeld LLC
1120 Avenue of the Americas, 4th Floor
New York, NY 10036
Telephone: (212) 389-5947
Facsimile: (484) 362-2630
Email: mhirschfield@rccblaw.com
mskipof@rccblaw.com
bcohen@rccblaw.com
Attorneys for Defendant, Twosons Corporation

¹ Twosons is hereby renewing its Motion (ECF No. 87) on group pleading grounds. In the event all causes of action against Twosons are not fully dismissed, Twosons reserves its rights to file a subsequent motion to dismiss on all other available grounds including, by way of example and not limitation, standing, lack of personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted. Additionally, by filing this Motion, Twosons is respectfully not consenting to the personal jurisdiction of this Court.

