

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD LITIGATION

Consolidated Case No.  
18-cv-6658 (JSR)

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  
INTERNATIONAL (A) LTD., and  
PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (BL) LLC,

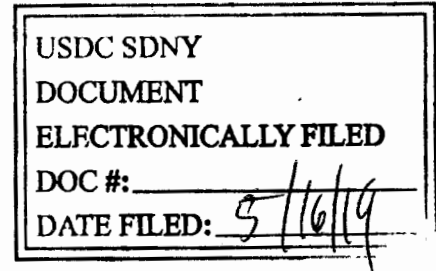
Civil Action No.  
18-cv-12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.

Defendants.



WASHINGTON NATIONAL INSURANCE  
COMPANY and BANKERS CONSECO  
LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

**STIPULATION**

**WHEREAS**, Third-Party Plaintiffs Washington National Insurance Company and Bankers Consec Life Insurance Company (collectively, "Third-Party Plaintiffs") filed a Summons and Third-Party Complaint on March 27, 2019 (ECF No. 75);

**WHEREAS**, the Third-Party Plaintiffs filed its Summons returned as executed on April 25, 2019 (ECF No. 126) together with an Affidavit of Service purporting to effect service on Third-Party Defendant Will Slota (“Slota”) on April 13, 2019;

**WHEREAS**, Slota disputes the validity of service upon him on April 13, 2019;

**WHEREAS**, Third-Party Plaintiffs served Slota with the Summons and Third-Party Complaint on May 6, 2019; and

**WHEREAS**, Slota does not dispute the validity of service upon him on May 6, 2019.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys, as follows:

1. That time for Third-Party Defendant Will Slota (“Slota”) to answer, move or otherwise respond to the Third-Party Complaint is extended to, and including, May 23, 2019 without prejudice to each and all of Slota’s rights, remedies and defenses which are hereby reserved except Slota hereby waives the defense of lack of proper service of the Summons and Third-Party Complaint.

2. The time for Third-Party Plaintiffs Washington National Insurance Company and Bankers Conesco Life Insurance Company (collectively, “Third-Party Plaintiffs”) to file opposition to any motion by Slota is extended to, and including, June 12, 2019;

3. The time Slota to file reply papers, if any, is extended to, and including, June 26, 2019; and

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4. The Third-Party Plaintiffs Demand Pursuant To Local Civil Rule 26.1 is hereby withdrawn.

Dated: New York, NY  
May 13, 2019

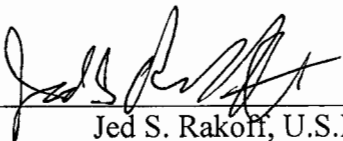
**COX PADMORE SKOLNIK &  
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina  
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**ALSTON & BIRD**

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SO ORDERED:

  
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Jed S. Rakoff, U.S.D.J.

5-13-19