

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION

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18-cv-6658 (JSR)

SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

Plaintiff,

18-cv-6658 (JSR)

v.

BEECHWOOD RE LTD., et al.,

Defendants.

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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  
Liquidation) and PLATINUM PARTNERS VALUE  
ARBITRAGE FUND L.P. (in Official Liquidation),

Plaintiffs,

18-cv-10936 (JSR)

v.

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.

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MELANIE L. CYGANOWSKI, as Equity Receiver for  
PLATINUM PARTNERS CREDIT OPPORTUNITIES  
MASTER FUND LP, et al.,

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

18-cv-12018 (JSR)

WASHINGTON NATIONAL INSURANCE COMPANY and  
BANKERS CONSECO LIFE INSURANCE COMPANY,

Cross-Claim Plaintiffs,

v.

MOSHE M. FEUER a/k/a MARK FEUER, et al.,

Cross-Claim Defendants.

WASHINGTON NATIONAL INSURANCE COMPANY and  
BANKERS CONSECO LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

**JURY TRIAL DEMANDED**

v.

MARK NORDLICHT, MURRAY HUBERFELD, DAVID  
BODNER, DAVID LEVY, RICHARD HODGDON, et al.,

Third-Party Defendants.

**THIRD-PARTY DEFENDANT RICHARD HODGDON'S  
ANSWER TO THIRD PARTY COMPLAINT WITH DEFENSES**

Third-Party Defendant **RICHARD HODGDON** (“**Hodgdon**”), by and through his attorneys, Harris Beach PLLC, as and for an Answer to Third-Party Plaintiffs Bankers Consec Life Insurance Company and Washington National Insurance Company’s March 27, 2019 Answer, Cross-Claims and Third-Party Complaint (the “Third-Party Complaint”), respectfully states as follows:

1.-469. Paragraphs 1-469 (inclusive of the Second Paragraphs of 151-161) of Third-Party Plaintiffs’ Third-Party Complaint are responsive to the Complaint and are thus not directed at nor require a response from Mr. Hodgdon. To the extent a response is required, Mr. Hodgdon denies the allegations in the Third-Party Plaintiffs’ Answer.

**AS AND FOR AN ANSWER TO THE INTRODUCTION**

470. Mr. Hodgdon denies the allegations contained in paragraph “470”, including the footnotes thereto, in the Third Party Complaint to the extent the allegations relate to Mr. Hodgdon, and denies knowledge or information as to the allegations related to other Third-Party Defendants.

471. Mr. Hodgdon denies the allegations contained in paragraph “471” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

472. Mr. Hodgdon denies the allegations contained in paragraph “472” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

473. Mr. Hodgdon denies the allegations contained in paragraph “473” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

474. Mr. Hodgdon denies the allegations contained in paragraph “474” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

475. Mr. Hodgdon denies the allegations contained in paragraph “475” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

**AS AND FOR AN ANSWER TO THE JURISDICTION AND VENUE**

476. Mr. Hodgdon denies the allegations contained in paragraph “476-” in the Third Party Complaint to the extent anyone is required and refer all questions of law to the court.

477. Mr. Hodgdon denies the allegations contained in paragraph “477” in the Third Party Complaint to the extent anyone is required and refer all questions of law to the court.

**AS AND FOR AN ANSWER TO  
THE CROSS-CLAIM AND THIRD-PARTY PLAINTIFFS**

478. Mr. Hodgdon denies the allegations contained in paragraph “478” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

479. Mr. Hodgdon denies the allegations contained in paragraph “479” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

**AS AND FOR AN ANSWER TO THE RACKETEERS, THE STRUCTURE OF THEIR  
CONSPIRACY AND A SAMPLER OF THEIR ROLES AND FRAUDULENT ACTS**

480. Mr. Hodgdon denies the allegations contained in paragraph “480” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

481. Mr. Hodgdon denies the allegations contained in paragraph “481” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

482. Mr. Hodgdon denies the allegations contained in paragraph “482” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

483. Mr. Hodgdon denies the allegations contained in paragraph “483” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

484. Mr. Hodgdon denies the allegations contained in paragraph “484” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

485. Mr. Hodgdon denies the allegations contained in paragraph “485” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

486. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “486” as they relate to other Third-Party Defendants.

487. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “487” as they relate to other Third-Party Defendants.

488. Mr. Hodgdon denies the allegations contained in paragraph “488” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

489. Mr. Hodgdon denies the allegations contained in paragraph “489” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

490. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “490” as they relate to other Third-Party Defendants. To the extent the allegations in paragraph “490” relate to Mr. Hodgdon, he denies the same.

491. Mr. Hodgdon admits that he held the title Managing Director at Platinum Management (NY) LLC from on or about July 2013 until on or about May 8, 2015, and held the title Chief Underwriting Officer at B Asset Manager, LP from on or about May 8, 2015 until on or about January 23, 2017. To the extent the allegations of paragraph “491” are directed to parties other than Mr. Hodgdon, no response is required, but in any event Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of, and therefore denies, the same. Except as explicitly admitted, Mr. Hodgdon denies the allegations in paragraph “491” of the Third Party Complaint.

492. Mr. Hodgdon admits that his e-mail signature during the time period of July 2013 through April 2015 reflected his role with the Beechwood entities. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “492” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies any and all admissions referred to in paragraph “492” and in the Third-Party Complaint generally, and denies that Third-Party Plaintiffs’ presentation of his alleged words – if they are in fact his words – reflect the context, meaning, or intent of the same. To the extent the allegations of paragraph “492” refer or relate to parties other than Mr. Hodgdon, no response is required, but in any event Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of, and therefore denies, the same. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “492.”

493. Mr. Hodgdon denies the allegations contained in paragraph “493” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

494. Mr. Hodgdon denies the allegations contained in paragraph “494” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

495. Mr. Hodgdon denies the allegations contained in paragraph “495” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

496. Mr. Hodgdon denies the allegations contained in paragraph “496” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

497. Mr. Hodgdon denies the allegations contained in paragraph “497” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

498. Mr. Hodgdon denies the allegations contained in paragraph “498” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

499. Mr. Hodgdon denies the allegations contained in paragraph “499” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

500. Mr. Hodgdon denies the allegations contained in paragraph “500” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

501. Mr. Hodgdon denies the allegations contained in paragraph “501” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

502. Mr. Hodgdon denies the allegations contained in paragraph “502” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

503. Mr. Hodgdon denies the allegations contained in paragraph “503” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

504. Mr. Hodgdon denies the allegations contained in paragraph “504” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

505. Mr. Hodgdon denies the allegations contained in paragraph “505” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

506. Mr. Hodgdon denies the allegations contained in paragraph “506” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

507. Mr. Hodgdon denies the allegations contained in paragraph “507” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

508. Mr. Hodgdon denies the allegations contained in paragraph “508” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.



509. Mr. Hodgdon denies the allegations contained in paragraph “509” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

510. Mr. Hodgdon denies the allegations contained in paragraph “510” of the Third Party Complaint related to Mr. Hodgdon, refers all questions of law to the Court, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

511. Mr. Hodgdon denies the allegations contained in paragraph “511” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

512. Mr. Hodgdon denies the allegations contained in paragraph “512” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

513. Mr. Hodgdon denies the allegations contained in paragraph “513” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

514. Mr. Hodgdon denies the allegations contained in paragraph “514” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants..

515. Mr. Hodgdon denies the allegations contained in paragraph “515” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

516. Mr. Hodgdon denies the allegations contained in paragraph “516” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

517. Mr. Hodgdon denies the allegations contained in paragraph “517” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

518. Mr. Hodgdon denies the allegations contained in paragraph “518” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

519. Mr. Hodgdon denies the allegations contained in paragraph “519” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

520. Mr. Hodgdon denies the allegations contained in paragraph “520” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

521. Mr. Hodgdon denies the allegations contained in paragraph “521” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

**AS AND FOR AN ANSWER TO THE STATEMENT OF FACTS**

522. Mr. Hodgdon denies the allegations contained in paragraph “522” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

523. Mr. Hodgdon denies the allegations contained in paragraph “523” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

524. Mr. Hodgdon denies the allegations contained in paragraph “524” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

525. Mr. Hodgdon denies the allegations contained in paragraph “525” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

526. Mr. Hodgdon denies the allegations contained in paragraph “526” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

527. Mr. Hodgdon denies the allegations contained in paragraph “527” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

528. Mr. Hodgdon denies the allegations contained in paragraph “528” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

529. Mr. Hodgdon denies the allegations contained in paragraph “529” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

530. Mr. Hodgdon denies the allegations contained in paragraph “530” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

531. Mr. Hodgdon denies the allegations contained in paragraph “531” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

532. Mr. Hodgdon denies the allegations contained in paragraph “532” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

533. Mr. Hodgdon denies the allegations contained in paragraph “533” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

534. Mr. Hodgdon denies the allegations contained in paragraph “534” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

535. Mr. Hodgdon denies the allegations contained in paragraph “535” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

536. Mr. Hodgdon denies the allegations contained in paragraph “536” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

537. Mr. Hodgdon denies the allegations contained in paragraph “537” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

538. Mr. Hodgdon denies the allegations contained in paragraph “538” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

539. Mr. Hodgdon admits that he participated in presentations to principals for Third-Party Plaintiffs regarding Beechwood, but denies that he made any misrepresentations and/or knowingly participated in the dissemination of misinformation and/or any misrepresentations. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “539” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr.

Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “539” of the Third-Party Complaint.

540. Mr. Hodgdon admits that he participated in presentations to principals for Third-Party Plaintiffs regarding Beechwood, but denies that he made any misrepresentations and/or knowingly participated in the dissemination of misinformation and/or any misrepresentations. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “540” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “540” of the Third-Party Complaint.

541. Mr. Hodgdon denies the allegations contained in paragraph “541” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

542. Mr. Hodgdon denies the allegations contained in paragraph “542” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

543. Mr. Hodgdon denies the allegations contained in paragraph “543” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

544. Mr. Hodgdon admits that he participated in presentations to principals for Third-Party Plaintiffs regarding Beechwood, but denies that he made any misrepresentations and/or knowingly participated in the dissemination of misinformation and/or any misrepresentations.

Mr. Hodgdon specifically denies any knowledge of or participation in (or related to) the alleged or actual, intentional or unintentional misrepresentation, miscalculation, or fraudulent presentation of the valuation of Beechwood's capital (or anything else). Mr. Hodgdon denies possessing any information related to the valuation of Beechwood's capital and/or Platinum until news reports were disseminated regarding the same. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph "544" of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph "544" of the Third-Party Complaint.

545. Mr. Hodgdon specifically denies participating in any schemes, and denies knowledge of the "Demand Note" for the Nordlicht Group and/or Beechwood Re Investors LLC", and/or the facts associated with the same. Mr. Hodgdon specifically denies any knowledge of or participation in (or related to) the alleged or actual, intentional or unintentional misrepresentation, miscalculation, or fraudulent presentation of the valuation of Beechwood's capital (or anything else). Mr. Hodgdon denies possessing any information related to the valuation of Beechwood's capital and/or Platinum until news reports were disseminated regarding the same. Mr. Hodgdon further denies the remaining allegations contained in paragraph "545" of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

546. Mr. Hodgdon specifically denies participating in any schemes, and denies knowledge of the "Demand Note" for the Nordlicht Group and/or Beechwood Re Investors

LLC”, and/or the facts associated with the same. Mr. Hodgdon specifically denies any knowledge of or participation in (or related to) the alleged or actual, intentional or unintentional misrepresentation, miscalculation, or fraudulent presentation of the valuation of Beechwood’s capital (or anything else). Mr. Hodgdon denies possessing any information related to the valuation of Beechwood’s capital and/or Platinum until news reports were disseminated regarding the same. Mr. Hodgdon further denies the remaining allegations contained in paragraph “546” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

547. Mr. Hodgdon specifically denies participating in any schemes, and denies knowledge of the “Demand Note” for the Nordlicht Group and/or Beechwood Re Investors LLC”, and/or the facts associated with the same. Mr. Hodgdon specifically denies any knowledge of or participation in (or related to) the alleged or actual, intentional or unintentional misrepresentation, miscalculation, or fraudulent presentation of the valuation of Beechwood’s capital (or anything else). Mr. Hodgdon denies possessing any information related to the valuation of Beechwood’s capital and/or Platinum until news reports were disseminated regarding the same. Mr. Hodgdon further denies the remaining allegations contained in paragraph “547” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

548. Mr. Hodgdon denies the allegations contained in paragraph “548” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

549. Mr. Hodgdon specifically denies participating in any schemes, and denies knowledge of the “Demand Note” for the Nordlicht Group and/or Beechwood Re Investors

LLC”, and/or the facts associated with the same. Mr. Hodgdon specifically denies any knowledge of or participation in (or related to) the alleged or actual, intentional or unintentional misrepresentation, miscalculation, or fraudulent presentation of the valuation of Beechwood’s capital (or anything else). Mr. Hodgdon denies possessing any information related to the valuation of Beechwood’s capital and/or Platinum until news reports were disseminated regarding the same. Mr. Hodgdon further denies the remaining allegations contained in paragraph “549” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

550. Mr. Hodgdon denies the allegations contained in paragraph “550” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

551. Mr. Hodgdon denies the allegations contained in paragraph “551” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

552. Mr. Hodgdon denies the allegations contained in paragraph “552” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

553. Mr. Hodgdon denies the allegations contained in paragraph “553” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

554. Mr. Hodgdon denies the allegations contained in paragraph “554” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.



555. Mr. Hodgdon denies the allegations contained in paragraph “555” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

556. Mr. Hodgdon denies the allegations contained in paragraph “556” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

557. Mr. Hodgdon denies the allegations contained in paragraph “557” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

558. Mr. Hodgdon denies the allegations contained in paragraph “558” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants

559. Mr. Hodgdon denies the allegations contained in paragraph “559” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

560. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “560” as they relate to other Third-Party Defendants.

561. Mr. Hodgdon denies the allegations contained in paragraph “561” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

562. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “562” as they relate to other Third-Party Defendants.

563. Mr. Hodgdon denies the allegations contained in paragraph “563” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

564. Mr. Hodgdon denies the allegations contained in paragraph “564” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

565. Mr. Hodgdon denies the allegations contained in paragraph “565” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

566. Mr. Hodgdon denies the allegations contained in paragraph “566” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

567. Mr. Hodgdon denies the allegations contained in paragraph “567” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

568. Mr. Hodgdon denies the allegations contained in paragraph “568” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

569. Mr. Hodgdon denies the allegations contained in paragraph “569” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

570. Mr. Hodgdon denies the allegations contained in paragraph “570” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

571. Mr. Hodgdon denies the allegations contained in paragraph “571” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

572. Mr. Hodgdon denies the allegations contained in paragraph “572” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

573. Mr. Hodgdon denies the allegations contained in paragraph “573” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

574. Mr. Hodgdon admits that he held the title Managing Director at Platinum Management (NY) LLC from on or about July 2013 until on or about May 8, 2015, and held the title of Chief Underwriting Officer at B Asset Manager, LP from on or about May 8, 2015 until on or about January 23, 2017. Mr. Hodgdon denies that he acted as Third-Party Plaintiffs’ reinsurance broker. Mr. Hodgdon denies participating in any “charades”, schemes, scams, or lies. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “574” as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations in paragraph “574” of the Third-Party Complaint.

575. Mr. Hodgdon denies the allegations contained in paragraph “575” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

576. Mr. Hodgdon admits that he participated in presentations to principals for Third-Party Plaintiffs regarding Beechwood, but denies that he made any misrepresentations and/or knowingly participated in the dissemination of misinformation and/or any misrepresentations. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “576” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr.

Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “576” of the Third-Party Complaint.

577. Mr. Hodgdon admits that he participated in presentations to principals for Third-Party Plaintiffs regarding Beechwood, but denies that he made any misrepresentations and/or knowingly participated in the dissemination of misinformation and/or any misrepresentations. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “577” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “577” of the Third-Party Complaint.

578. Mr. Hodgdon denies the allegations contained in paragraph “578” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

579. Mr. Hodgdon denies the allegations contained in paragraph “579” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

580. Mr. Hodgdon denies the allegations contained in paragraph “580” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

581. Mr. Hodgdon denies the allegations contained in paragraph “581” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

582. Mr. Hodgdon denies the allegations contained in paragraph “582” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

583. Mr. Hodgdon denies the allegations contained in paragraph “583” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

584. Mr. Hodgdon denies the allegations contained in paragraph “584” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants<sup>3</sup>

585. Mr. Hodgdon denies the allegations contained in paragraph “585” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

586. Mr. Hodgdon denies the allegations contained in paragraph “586” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

587. Mr. Hodgdon denies the allegations contained in paragraph “587” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

588. Mr. Hodgdon denies the allegations contained in paragraph “588” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

589. Mr. Hodgdon denies the allegations contained in paragraph “589” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

590. Mr. Hodgdon denies the allegations contained in paragraph “590” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

591. Mr. Hodgdon denies the allegations contained in paragraph “591” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

592. Mr. Hodgdon denies the allegations contained in paragraph “592” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

593. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “593” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “593” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

594. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “594” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “594” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

595. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore

cannot review, including all of the documents referenced in paragraph “595” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “595” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

596. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “596” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “596” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

597. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “597” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “597” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

598. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “598” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “598” of the Third Party Complaint

related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

599. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “599” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “599” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

600. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “600” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “600” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

601. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “601” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “601” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

602. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore



cannot review, including all of the documents referenced in paragraph “602” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “602” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

603. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “603” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “603” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

604. Mr. Hodgdon denies the allegations contained in paragraph “604” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

605. Mr. Hodgdon denies the allegations contained in paragraph “605” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

606. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “606” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies any and all admissions referred to in paragraph “606” and in the Third-Party Complaint generally, and denies that Third-Party Plaintiffs’ presentation of his alleged words – if they are in fact his words – reflect the context, meaning, or intent of the same. Mr. Hodgdon

denies the allegations contained in paragraph “606” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

607. Mr. Hodgdon denies the allegations contained in paragraph “607” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

608. Mr. Hodgdon denies the allegations contained in paragraph “608” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

609. Mr. Hodgdon denies the allegations contained in paragraph “609” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

610. Mr. Hodgdon denies the allegations contained in paragraph “610” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

611. Mr. Hodgdon denies the allegations contained in paragraph “611” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

612. Mr. Hodgdon denies the allegations contained in paragraph “612” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

613. Mr. Hodgdon denies the allegations contained in paragraph “613” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

614. Mr. Hodgdon denies the allegations contained in paragraph “614” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

615. Mr. Hodgdon denies the allegations contained in paragraph “615” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

616. Mr. Hodgdon denies the allegations contained in paragraph “616” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

617. Mr. Hodgdon denies the allegations contained in paragraph “617” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

618. Mr. Hodgdon denies the allegations contained in paragraph “618” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

619. Mr. Hodgdon denies the allegations contained in paragraph “619” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

620. Mr. Hodgdon denies the allegations contained in paragraph “620” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

621. Mr. Hodgdon denies the allegations contained in paragraph “621” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

622. Mr. Hodgdon denies the allegations contained in paragraph “622” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

623. Mr. Hodgdon denies the allegations contained in paragraph “623” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

624. Mr. Hodgdon denies the allegations contained in paragraph “624” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

625. Mr. Hodgdon denies the allegations contained in paragraph “625” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

626. Mr. Hodgdon denies the allegations contained in paragraph “626” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

627. Mr. Hodgdon denies the allegations contained in paragraph “627” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

628. Mr. Hodgdon denies the allegations contained in paragraph “628” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

629. Mr. Hodgdon admits that he held the title Managing Director at Platinum Management (NY) LLC from on or about July 2013 until on or about May 8, 2015, and held the title of Chief Underwriting Officer at B Asset Manager, LP from on or about May 8, 2015 until on or about January 23, 2017. Mr. Hodgdon denies knowledge or information sufficient to form

a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “629” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies any and all admissions referred to in paragraph “629” and in the Third-Party Complaint generally, and denies that Third-Party Plaintiffs’ presentation of his alleged words – if they are in fact his words – reflect the context, meaning, or intent of the same. Mr. Hodgdon denies the allegations contained in paragraph “629” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

630. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “630.”

631. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “631.”

632. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “632.”

633. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “633.”

634. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “634.”

635. Mr. Hodgdon denies the allegations contained in paragraph “635” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

636. Mr. Hodgdon denies the allegations contained in paragraph “636” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

637. Mr. Hodgdon denies the allegations contained in paragraph “637” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

638. Mr. Hodgdon denies the allegations contained in paragraph “638” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

639. Mr. Hodgdon denies the allegations contained in paragraph “639” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

640. Mr. Hodgdon denies the allegations contained in paragraph “640” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

641. Mr. Hodgdon denies the allegations contained in paragraph “641” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

642. Mr. Hodgdon denies the allegations contained in paragraph “642” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

643. Mr. Hodgdon denies the allegations contained in paragraph “643” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

644. Mr. Hodgdon denies the allegations contained in paragraph “644” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

645. Mr. Hodgdon denies the allegations contained in paragraph “645” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

646. Mr. Hodgdon denies the allegations contained in paragraph “646” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

647. Mr. Hodgdon denies the allegations contained in paragraph “647” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

648. Mr. Hodgdon denies the allegations contained in paragraph “648” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

649. Mr. Hodgdon denies the allegations contained in paragraph “649” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants<sup>8</sup>

650. Mr. Hodgdon denies the allegations contained in paragraph “650” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

651. Mr. Hodgdon denies the allegations contained in paragraph “651” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

652. Mr. Hodgdon denies the allegations contained in paragraph “652” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

653. Mr. Hodgdon denies the allegations contained in paragraph “653” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

654. Mr. Hodgdon denies the allegations contained in paragraph “654” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

655. Mr. Hodgdon denies the allegations contained in paragraph “655” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

656. Mr. Hodgdon denies the allegations contained in paragraph “656” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

657. Mr. Hodgdon denies the allegations contained in paragraph “657” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

658. Mr. Hodgdon denies the allegations contained in paragraph “658” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

659. Mr. Hodgdon denies the allegations contained in paragraph “659” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

660. Mr. Hodgdon denies the allegations contained in paragraph “660” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.



661. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “661” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “661” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

662. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “662” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “662” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

663. Mr. Hodgdon denies the allegations contained in paragraph “663” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

664. Mr. Hodgdon denies the allegations contained in paragraph “664” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

665. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “665” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “665” of the Third Party Complaint

related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

666. Mr. Hodgdon denies the allegations contained in paragraph “666” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

667. Mr. Hodgdon denies the allegations contained in paragraph “667” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

668. Mr. Hodgdon denies the allegations contained in paragraph “668” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

669. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “669” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “669” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

670. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “670” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “670” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

671. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “671” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “671” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

672. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “672” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “672” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

673. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “673” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “673” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

674. Mr. Hodgdon denies the allegations contained in paragraph “674” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

675. Mr. Hodgdon denies the allegations contained in paragraph “675” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

676. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “676” of the Third-Party Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies the allegations contained in paragraph “676” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

677. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “677.”

678. Mr. Hodgdon denies the allegations contained in paragraph “678” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

679. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “679.”

680. Mr. Hodgdon denies the allegations contained in paragraph “680” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

681. Mr. Hodgdon denies the allegations contained in paragraph “681” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

682. Mr. Hodgdon admits that Beechwood entered into reinsurance agreements with entities other than Third Party Plaintiffs, including SHIP and ACLICO. Mr. Hodgdon denies

that he was enriched in any way as a result of the actions or inactions of Beechwood and/or Platinum, given his status as a salaried employee at all times relevant to the Third-Party Complaint. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph “682” related to other Third-Party Defendants and therefore denies the same. Except as explicitly admitted, Mr. Hodgdon denies the allegations contained in paragraph “682.”

683. Mr. Hodgdon denies the allegations contained in paragraph “683” in the Third Party Complaint.

684. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “684.”

685. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “685.”

686. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “686.”

687. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “687.”

688. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “688.”

689. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “689.”

690. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “690.”

691. Mr. Hodgdon denies the allegations contained in paragraph “691” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

692. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “692.”

693. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “693.”

694. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “694.”

695. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “695.”

696. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “696.”

697. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “697.”

698. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “698.”

699. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “699.”

700. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “700.”

701. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “701.”

702. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “702.”

703. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “703.”

704. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “704.”

705. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “705.”

706. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “706.”

707. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “707.”

708. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “708.”

709. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “709.”

710. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “710.”

711. Mr. Hodgdon denies the allegations contained in paragraph “711” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

712. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “712.”

713. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “713.”

714. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “714.”

715. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “715.”

716. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “716.”

717. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “717.”

718. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “718.”

719. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “719.”

720. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “720.”

721. Mr. Hodgdon denies the allegations contained in paragraph “721” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

722. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “722.”

723. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “723.”

724. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “724.”

725. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “725.”

726. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “726.”

727. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “727.”



728. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “728.”

729. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “729.”

730. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “730.”

731. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “731.”

732. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “732.”

733. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “733.”

734. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “734.”

735. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “735.”

736. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “736.”

737. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “737.”

738. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “738.”

739. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “739.”

740. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “740.”

741. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “741.”

742. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “742.”

743. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “743.”

744. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “744.”

745. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “745.”

746. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “746.”

747. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “747.”

748. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “748.”

749. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “749.”

750. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “750.”

751. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “751.”

752. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “752.”

753. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “753.”

754. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “754.”

755. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “755.”

756. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “756.”

757. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “757.”

758. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “758.”

759. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “759.”

760. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “760.”

761. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “761.”

762. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “762.”

763. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “763.”

764. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “764.”

765. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “765.”

766. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “766.”

767. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “767.”

768. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “768.”

769. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “769.”

770. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “770.”

771. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “771.”

772. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “772.”

773. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “773.”

774. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “774.”

775. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “775.”

776. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “776.”

777. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “777.”

778. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “778.”

779. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “779.”

780. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “780.”

781. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “781.”

782. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “782.”

783. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “783.”

**AS AN FOR AN ANSWER TO CLAIMS FOR RELIEF**  
**AS AND FOR AN ANSWER TO COUNT ONE**  
**Violation of Civil RICO – 18 U.S.C. § 1962(c)**

784. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

785. Mr. Hodgdon refers all question of law to the Court, and denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “785.”

786. Mr. Hodgdon refers all question of law to the Court. Mr. Hodgdon denies the allegations contained in paragraph “786” of the Third Party Complaint related to Mr. Hodgdon,

and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

787. Mr. Hodgdon refers all question of law to the Court. Mr. Hodgdon denies the allegations contained in paragraph “787” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

788. Mr. Hodgdon denies the allegations contained in paragraph “788” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

789. Mr. Hodgdon denies the allegations contained in paragraph “789” of the Third Party Complaint.

790. Mr. Hodgdon denies the allegations contained in paragraph “790” of the Third Party Complaint.

791. Mr. Hodgdon denies the allegations contained in paragraph “791” of the Third Party Complaint.

792. Mr. Hodgdon denies the allegations contained in paragraph “792” of the Third Party Complaint.

793. Mr. Hodgdon denies the allegations contained in paragraph “793” of the Third Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT TWO**  
**RICO Conspiracy – 18 U.S.C. § 1962(d)**

794. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

795. Mr. Hodgdon denies the allegations contained in paragraph “795” of the Third Party Complaint.

796. Mr. Hodgdon denies the allegations contained in paragraph “796” of the Third Party Complaint.

797. Mr. Hodgdon denies the allegations contained in paragraph “797” of the Third Party Complaint.

798. Mr. Hodgdon denies the allegations contained in paragraph “798” of the Third Party Complaint.

799. Mr. Hodgdon denies the allegations contained in paragraph “799” of the Third Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT THREE**  
**Fraudulent Inducement and Fraud**

800. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

801. Mr. Hodgdon denies the allegations contained in paragraph “801” of the Third Party Complaint.

802. Mr. Hodgdon denies the allegations contained in paragraph “802” of the Third Party Complaint.

803. Mr. Hodgdon denies the allegations contained in paragraph “803” of the Third Party Complaint.

804. Mr. Hodgdon denies the allegations contained in paragraph “804” of the Third Party Complaint.

805. Mr. Hodgdon denies the allegations contained in paragraph “805” of the Third Party Complaint.

806. Mr. Hodgdon denies the allegations contained in paragraph “806” of the Third Party Complaint.

807. Mr. Hodgdon denies the allegations contained in paragraph “807” of the Third Party Complaint and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT FOUR**  
**Fraudulent Inducement and Fraud**

808. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

809. Paragraph “809” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “809” of the Third-Party Complaint.

810. Paragraph “810” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “810” of the Third-Party Complaint.

811. Paragraph “811” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “811” of the Third-Party Complaint.

812. Paragraph “812” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “812” of the Third-Party Complaint.

813. Paragraph “813” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “813” of the Third-Party Complaint.

814. Paragraph “814” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “814” of the Third-Party Complaint.



815. Paragraph “815” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “815” of the Third-Party Complaint and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT FIVE**  
**Fraudulent Misrepresentation and Omission**

816. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

817. Paragraph “817” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “817” of the Third-Party Complaint.

818. Paragraph “818” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “818” of the Third-Party Complaint.

819. Paragraph “819” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “819” of the Third-Party Complaint.

820. Paragraph “820” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “820” of the Third-Party Complaint.

821. Paragraph “821” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “821” of the Third-Party Complaint.

822. Paragraph “822” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “822” of the Third-Party Complaint.

823. Paragraph “823” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “823” of the Third-Party Complaint.

824. Paragraph “824” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “824” of the Third-Party Complaint.

825. Paragraph “825” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “825” of the Third-Party Complaint and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT SIX**  
**Negligent Misrepresentation**

826. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

827. Paragraph “827” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “827” of the Third-Party Complaint.

828. Paragraph “828” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “828” of the Third-Party Complaint.

829. Paragraph “829” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “829” of the Third-Party Complaint.

830. Paragraph “830” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “830” of the Third-Party Complaint.

831. Paragraph “831” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “831” of the Third-Party Complaint.

832. Paragraph “832” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “832” of the Third-Party Complaint.

833. Paragraph “833” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “833” of the Third-Party Complaint.

834. Paragraph “834” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “834” of the Third-Party Complaint, and denies that Third-Party Plaintiff is entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT SEVEN**  
**Aiding and Abetting Fraud**

835. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

836. Mr. Hodgdon denies the allegations contained in paragraph “836” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

837. Mr. Hodgdon denies the allegations contained in paragraph “837” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

838. Mr. Hodgdon denies the allegations contained in paragraph “838” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

839. Mr. Hodgdon denies the allegations contained in paragraph “839” of the Third Party Complaint.

840. Mr. Hodgdon denies the allegations contained in paragraph “840” of the Third Party Complaint.

841. Mr. Hodgdon denies the allegations contained in paragraph “841” of the Third Party Complaint.

842. Mr. Hodgdon denies the allegations contained in paragraph “842” of the Third Party Complaint related to Mr. Hodgdon.

843. Mr. Hodgdon denies the allegations contained in paragraph “843” of the Third Party Complaint and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT EIGHT**  
**Aiding and Abetting Fraud**

844. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

845. Paragraph “845” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “845” of the Third-Party Complaint.

846. Paragraph “846” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “846” of the Third-Party Complaint.

847. Paragraph “847” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “847” of the Third-Party Complaint.

848. Paragraph “848” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “848” of the Third-Party Complaint.

849. Paragraph “849” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “849” of the Third-Party Complaint.

850. Paragraph “850” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “850” of the Third-Party Complaint.

851. Paragraph “851” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “851” of the Third-Party Complaint.

852. Paragraph “852” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “852” of the Third-Party Complaint and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT NINE**  
**Conspiracy to Commit Fraud**

853. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

854. Paragraph “854” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “854” of the Third-Party Complaint.

855. Paragraph “855” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “855” of the Third-Party Complaint.

856. Paragraph “856” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “856” of the Third-Party Complaint.

857. Paragraph “857” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “857” of the Third-Party Complaint.

858. Paragraph “858” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “858” of the Third-Party Complaint.

859. Paragraph “859” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “859” of the Third-Party Complaint.

860. Paragraph “860” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations

in paragraph “860” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT TEN**

**Breach of Contract**

861. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

862. Paragraph “862” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “862” of the Third-Party Complaint.

863. Paragraph “863” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “863” of the Third-Party Complaint.

864. Paragraph “864” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “864” of the Third-Party Complaint.

865. Paragraph “865” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “865” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT ELEVEN**

**Breach of Fiduciary Duty**

866. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

867. Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of the allegations related to any and all documents that he does not possess and therefore cannot review, including all of the documents referenced in paragraph “867” of the Third-Party

Complaint and the Third-Party Complaint in general, and therefore denies the same. Mr. Hodgdon denies any and all admissions referred to in paragraph “867” and in the Third-Party Complaint generally, and denies that Third-Party Plaintiffs’ presentation of his alleged words – if they are in fact his words – reflect the context, meaning, or intent of the same. To the extent the allegations of paragraph “867” refer or relate to parties other than Mr. Hodgdon, no response is required, but in any event Mr. Hodgdon denies knowledge or information sufficient to form a belief as to the truth of, and therefore denies, the same. Except as explicitly admitted, Mr. Hodgdon denies the allegations of paragraph “867.”

868. Mr. Hodgdon denies the allegations contained in paragraph “868” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants and therefore denies the same.

869. Mr. Hodgdon denies the allegations contained in paragraph “869” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

870. Mr. Hodgdon denies the allegations contained in paragraph “870” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

871. Mr. Hodgdon denies the allegations contained in paragraph “871” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

872. Mr. Hodgdon denies the allegations contained in paragraph “872” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants. Mr. Hodgdon further denies that Third-Party Plaintiffs are entitled to any relief.



**AS AND FOR AN ANSWER TO COUNT TWELVE**  
**Aiding and Abetting Breach of Fiduciary Duty**

873. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

874. Mr. Hodgdon denies the allegations contained in paragraph “874” of the Third Party Complaint.

875. Mr. Hodgdon denies the allegations contained in paragraph “875” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

876. Mr. Hodgdon denies the allegations contained in paragraph “876” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

877. Mr. Hodgdon denies the allegations contained in paragraph “877” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

878. Mr. Hodgdon denies the allegations contained in paragraph “878” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

879. Mr. Hodgdon denies the allegations contained in paragraph “879” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants, and further denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT THIRTEEN**  
**Aiding and Abetting Breach of Fiduciary Duty**

880. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

881. Paragraph “881” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “881” of the Third-Party Complaint.

882. Paragraph “882” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “882” of the Third-Party Complaint.

883. Paragraph “883” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “883” of the Third-Party Complaint.

884. Paragraph “884” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “884” of the Third-Party Complaint.

885. Paragraph “885” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “885” of the Third-Party Complaint.

886. Paragraph “886” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “886” of the Third-Party Complaint.

887. Paragraph “887” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “887” of the Third-Party Complaint.

888. Paragraph “888” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “888” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT FOURTEEN**  
**Fraudulent Conveyance – New York Debtor and**  
**Creditor Law §§ 276, 276-a, 278 and 279**

889. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

890. Paragraph “890” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “890” of the Third-Party Complaint.

891. Paragraph “891” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “891” of the Third-Party Complaint.

892. Paragraph “892” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “892” of the Third-Party Complaint.

893. Paragraph “893” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “893” of the Third-Party Complaint.

894. Paragraph “894” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “894” of the Third-Party Complaint.

895. Paragraph “895” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “895” of the Third-Party Complaint.

896. Paragraph “896” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “896” of the Third-Party Complaint.

897. Paragraph “897” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “897” of the Third-Party Complaint.

898. Paragraph “898” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “898” of the Third-Party Complaint.

899. Paragraph “899” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “899” of the Third-Party Complaint.

900. Paragraph “900” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “900” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT FIFTEEN**  
**Fraudulent Conveyance – New York Debtor**  
**and Creditor Law §§ 273, 278 and/or 279**

901. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

902. Paragraph “902” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “902” of the Third-Party Complaint.

903. Paragraph “903” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “903” of the Third-Party Complaint.

904. Paragraph “904” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “904” of the Third-Party Complaint.

905. Paragraph “905” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “905” of the Third-Party Complaint.

906. Paragraph “906” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “906” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT SIXTEEN**  
**Fraudulent Conveyance – New York Debtor**  
**and Creditor Law §§ 274, 278 and/or 279**

907. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

908. Paragraph “908” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “908” of the Third-Party Complaint.

909. Paragraph “909” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “909” of the Third-Party Complaint.

910. Paragraph “910” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “910” of the Third-Party Complaint.

911. Paragraph “911” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “911” of the Third-Party Complaint.

912. Paragraph “912” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “912” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT SEVENTEEN**  
**Fraudulent Conveyance – New York Debtor**  
**and Creditor Law §§ 275, 278 and/or 279**

913. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

914. Paragraph “914” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “914” of the Third-Party Complaint.

915. Paragraph “915” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “915” of the Third-Party Complaint.

916. Paragraph “916” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “916” of the Third-Party Complaint.

917. Paragraph “917” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations in paragraph “917” of the Third-Party Complaint.

918. Paragraph “918” is directed to parties other than Mr. Hodgdon and therefore does not require a response. To the extent a response is required, Mr. Hodgdon denies the allegations

in paragraph “918” of the Third-Party Complaint, and denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT EIGHTEEN**  
**Contribution and Indemnity**

919. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

920. Mr. Hodgdon denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph “920.”

921. Mr. Hodgdon denies the allegations contained in paragraph “921” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

922. Mr. Hodgdon denies the allegations contained in paragraph “922” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants, and further denies that Third-Party Plaintiffs are entitled to any relief.

**AS AND FOR AN ANSWER TO COUNT NINETEEN**  
**Unjust Enrichment/Constructive Trust**

923. Mr. Hodgdon repeats, reiterates, and realleges his responses to each of the foregoing allegations of the Third-Party Complaint as if fully set forth herein.

924. Mr. Hodgdon denies the allegations contained in paragraph “924” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

925. Mr. Hodgdon denies the allegations contained in paragraph “925” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants.

926. Mr. Hodgdon denies the allegations contained in paragraph “926” of the Third Party Complaint related to Mr. Hodgdon, and denies knowledge and information sufficient to form a belief as to the truth of the allegations as they relate to other Third-Party Defendants, and further denies that Third-Party Plaintiffs are entitled to any relief.



**Third-Party Defendant Richard Hodgdon's Defenses**

1. The Third-Party Plaintiffs fail to state a claim, in whole or in part, upon which relief can be granted.

2. The Third-Party Plaintiffs' claims are barred, in whole or in part, by applicable statutes of limitations.

3. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the *in pari delicto* doctrine.

4. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the doctrine of laches.

5. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the doctrine of estoppel.

6. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver.

7. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the doctrine of ratification.

8. The Third-Party Plaintiffs' claims are barred, in whole or in part, by the doctrine of unclean hands.

9. The Third-Party Plaintiffs' claims are barred, in whole or in part, by their failure to mitigate, minimize or avoid any damages she may be claiming.

10. The Third-Party Plaintiffs' claims are barred, in whole or in part, because they lack standing to bring the claims against Third-Party Defendant.

11. The Third-Party Plaintiffs' claims are barred, in whole or in part, because Third-Party Defendant Richard Hodgdon at all times acted in good faith.

12. Third-Party Plaintiffs' claims are barred, in whole or in part, because they have been released, discharged, comprised and settled.

13. Third-Party Plaintiffs' claims are barred, in whole or in part, by accord and satisfaction.

14. Third-Party Plaintiffs' claims against Third-Party Defendant Richard Hodgdon are barred, in whole or in part due to lack of personal jurisdiction.

15. Third-Party Plaintiffs' claims are barred, in whole or in part, based on doctrines of assumption of risk and/or culpable conduct on the part of the Third-Party Plaintiffs.

16. Third-Party Plaintiffs' claims are barred, in whole in part, because any damages claimed were due the acts or omissions of parties other than Third-Party Defendant Richard Hodgdon.

17. Third-Party Plaintiffs' claim are barred, in whole or in part, because they have failed to plead claims against Third-Party Defendant Richard Hodgdon with the specificity required under Rule 9(b) of the Federal Rules of Civil Procedure.

18. Third-Party Plaintiffs' claims for exemplary or punitive damages are barred because such damages are not recoverable or warranted in this action.

19. Third-Party Plaintiffs' claims for punitive damages are barred by the Due Process Clauses of the Fifth and Fourteenth Amendment to the United States Constitution.

20. Third-Party Plaintiffs' RICO claims fail for lack of intent.

21. Third-Party Defendant Hodgdon incorporates the defenses and affirmative defenses of all those who are or may become parties to this action.

22. Third-Party Defendant Richard Hodgdon reserves the right to assert and rely upon other applicable defenses that may become available or apparent during discovery in this matter.

**WHEREFORE**, Third-Party Defendant Richard Hodgdon demands a trial by jury for all claims so triable, and judgement dismissing the Third-Party Complaint of Third-Party Plaintiffs, together with the costs and disbursements of this action.

Dated: New York, New York  
May 20, 2019

Respectfully submitted,

/s/ Peri A. Berger

Peri A. Berger

Robert A. Schaefer, Jr.

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