

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD LITIGATION

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

MELANIE L. CYGANOWSKI, as Equity  
Receiver for PLATINUM PARTNERS  
CREDIT OPPORTUNITIES MASTER FUND  
LP, PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (TE) LLC,  
PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND LLC, PLATINUM  
PARTNERS CREDIT OPPORTUNITIES FUND  
INTERNATIONAL LTD., PLATINUM  
PARTNERS CREDIT OPPORTUNITIES  
INTERNATIONAL (A) LTD., and  
PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (BL) LLC,

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

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.

Defendants.

WASHINGTON NATIONAL INSURANCE  
COMPANY and BANKERS CONSECO  
LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of the Motion of Third-Party Defendant Will Slota's Motion to Dismiss the Third Party Complaint of Washington National Insurance Company and Bankers Conseco Life Insurance Company dated May 23, 2019, and upon all other pleadings and proceedings herein, Third-Party Defendant Will Slota respectfully moves this court before the Honorable Jed S. Rakoff, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order, pursuant to Fed R. Civ. P. 9(b) and 12(b)(6) dismissing the Third Party Complaint of Washington National Insurance Company and Bankers Conseco Life Insurance Company in its entirety as against Third-Party Defendant Will Slota with prejudice.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to this Court's Order dated May, 16, 2019, Third-Party Plaintiffs Washington National Insurance Company and Bankers Conseco Life Insurance Company's answering papers are due on or before June 12, 2019; Third Party Defendant Will Slota's reply papers, if any, are due June 26, 2019; and the Court shall hear oral argument on July 1, 2019 at 10:00 AM.

Dated: New York, NY  
May 23, 2019

**COX PADMORE SKOLNIK &  
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina

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Stefan B. Kalina, Esq.

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