UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

PLATINUM-BEECHWOOD LITIGATION

Civil Action No. 18-cv-6658 (JSR)

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),

Civil Action No. 18-cv-10936 (JSR)

Plaintiffs,

- against -

MOTION FOR PRO HAC VICE ADMISSION

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.

Pursuant to rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, John L. Brownlee hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrate Fund, L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) in the above captioned action.

I am in good standing of the bars of the Commonwealth of Virginia and the District of Columbia, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Respectfully Submitted,

Dated: February 20, 2019 McLean, Virginia

John L. Brownlee

HOLLAND & KNIGHT LLP

800 17th Street, N.W., Suite 1100

Washington, DC 20006

John.Brownlee@hklaw.com

Tel: (703) 720-8053 Fax: (202) 955-5564

Attorneys for Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation), and for Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation)

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Defendants.

AFFIDAVIT OF JOHN L. BROWNLEE IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION

AFFIDAVIT OF JOHN L. BROWNLEE

- I, John L. Brownlee, the undersigned, declare and say as follows:
- 1. I am an attorney of the law firm of Holland & Knight LLP, attorney of record for Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrate Fund, L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation). I have direct and personal knowledge of the facts set forth herein and, if called upon and sworn to testify, I could and would testify competently to the truth of the matters as set forth herein. I make this Affidavit in support of the concurrently-filed Motion for Admission Pro Hac Vice (the "Motion").
- 2. I am admitted to the bars of the Commonwealth of Virginia (No. 37358) and the District of Columbia (No. 452665), and I am in good standing with each of those bars. In

compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, true and correct copies of my Certificates of Standing issued by the clerks of the Supreme Court of Virginia and the District Court of Columbia Court of Appeals, within the past 30 days, are attached hereto as **Exhibit A** and are incorporated herein by this reference as if set forth in full.

- 3. I have never been convicted of a felony.
- 4. I have never been censured, suspended, disbarred, or otherwise denied admission or readmission by any court or bar.
- 5. There are no present disciplinary proceedings pending against me nor have there ever been.
- 6. I respectfully request, pursuant to Local Rule 1.3(c), that the Court grant the Motion and permit my appearance on behalf of Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrate Fund, L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of February, 2019, in Tysons, Virginia.

John L. Brownlee

EXHIBIT A

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Douglas B. Robelen, Clerk of the Supreme Court of Virginia, do hereby certify that

JOHN LESLIE BROWNLEE

was admitted to practice as an attorney and counsellor at the bar of this Court on November 1, 1994.

I further certify that so far as the records of this office are concerned, JOHN LESLIE BROWNLEE is a member of the bar of this Court in good standing.

Witness my hand and seal of said Court

This 7th day of February

A.D. 2019

Deputy Clerk



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

John L'Brownlee

was duly qualified and admitted on **November 8, 1996** as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, an **Active** member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of Washington,
D.C., on February 5, 2019.

JULIO A. CASTILLO Clerk of the Court

Issued By:

District of Columbia Bar Membership

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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Civil Action No. 18-cv-10936 (JSR)

Plaintiffs,

- against -

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.

ORDER FOR ADMISSION PRO HAC VICE

The motion of John L. Brownlee, for admission to practice pro hac vice in the abovecaptioned action is granted.

Applicant has declared that he is a member in good standing of the bars of the Commonwealth of Virginia and the District of Columbia and that his contact information is as follows:

Applicant's Name: John L. Brownlee

Firm Name: Holland & Knight LLP

Address: 800 17th Street, N.W., Suite 1100

City/State/Zip: Washington, DC 20006

Telephone/Fax: (703) 720-8053; (202) 955-5564 Email: John.Brownlee@hklaw.com

Applicant having requested admission pro hac vice to appear for all purposes as counsel for Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign

Representatives of Platinum Partners Value Arbitrate Fund, L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) in the above entitled action.

IT IS HEREBY ORDERED that Applicant is admitted to practice pro hac vice in the	
above-captioned case in the United States District Court for the	Southern District of New York.
All attorneys appearing before this Court are subject to the Local	Rules of this Court, including
the Rules governing discipline of attorneys.	
Dated:	
Honorable Jed S. F	Rakoff
United States Distr	rict Indge