

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION	:	
	:	18-cv-06658 (JSR)
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MELANIE L. CYGANOWSKI,	:	
	:	
Plaintiffs,	:	18-cv-12018 (JSR)
	:	
-v-	:	
	:	
BEECHWOOD RE LTD., et al.,	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Cross-Claim Defendants B Asset Manager LP, B Asset Manager II LP, BAM Administrative Services LLC, Beechwood Re Ltd., Beechwood Re Holdings, Inc., Beechwood Bermuda Ltd., Beechwood Bermuda International Ltd., the Feuer Family Trust, and the Taylor-Lau Family Trust, and Third-Party Defendants B Asset Manager GP LLC, B Asset Manager II GP, LLC, MSD Administrative Services LLC, N Management LLC, Beechwood Global Distribution Trust, Feuer Family 2016 Acq Trust, Taylor-Lau Family 2016 Acq Trust, and Beechwood Capital Group LLC, upon the accompanying Memorandum of Law and the Declaration of Cheryl D. Lipsius (with exhibit), dated June 14, 2019, will move, by and through their undersigned counsel, before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 14B, New York, New York 10007, at such date as the Court will determine, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with prejudice the Cross-Claims and Third-Party Complaint of Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania (“SHIP”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 2(d) of the Individual Rules of Practice before this Court: (1) answering papers (if any) must be filed by June 28, 2019; (2) reply papers must be filed by July 12, 2019; and (3) oral argument on the motions to dismiss shall be heard on July 26, 2019 at 10:00 a.m.

Dated: June 14, 2019  
Kew Gardens, New York

LIPSIUS BENHAIM LAW LLP

By: /s/ Cheryl D. Lipsius  
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To: All counsel of record (via ECF)