

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.

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., 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 Senior Health Insurance Company of Pennsylvania dated June 14, 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 Senior Health Insurance Company of Pennsylvania in its entirety as against Third-Party Defendant Will Slota with prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's Order dated June, 12, 2019, Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania's answering papers are due on or before June 28, 2019; Third Party Defendant Will Slota's reply papers, if any, are due July 12 2019; and the Court shall hear oral argument on July 26, 2019 at 10:00 AM.

Dated: New York, NY
June 14, 2019

**COX PADMORE SKOLNIK &
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina

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