

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X	:
SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
-v-	:
	:
PLATINUM MANAGEMENT (NY) LLC;	:
PLATINUM CREDIT MANAGEMENT, L.P.;	:
MARK NORDLICHT;	:
DAVID LEVY;	:
DANIEL SMALL;	:
URI LANDESMAN;	:
JOSEPH MANN;	:
JOSEPH SANFILIPPO; and	:
JEFFREY SHULSE,	:
	:
Defendants.	:
-----X	:

No. 16-cv-6848 (DLI)

**NOTICE OF PROPOSED ORDER APPROVING FIRST INTERIM APPLICATION OF COOLEY LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED FROM DECEMBER 19, 2016 THROUGH MARCH 31, 2017**

PLEASE TAKE NOTICE that, at the request of the Court, the attached proposed order (the “Proposed Order”) is being submitted with respect to the First Application of Cooley LLP for Allowance of Compensation and Reimbursement of Expenses Incurred from December 19, 2016 Through March 31, 2017 [Dkt. No. 144].

PLEASE TAKE FURTHER NOTICE that any opposition to entry of the Proposed Order must be (i) made in writing; (ii) if by a party, electronically filed with the District Court; (iii) if by a non-party, electronically mailed to the Receiver, at her e-mail address, [platinumreceiver@otterbourg.com](mailto:platinumreceiver@otterbourg.com), so as to be actually received no later than December 26, 2017.

**PLEASE TAKE FURTHER NOTICE** that, in the absence of any timely filed or served written opposition, the Court may enter the Proposed Order, without further hearing or notice.

Dated: December 21, 2017

OTTERBOURG P.C.

By: /s/Adam C. Silverstein

Adam C. Silverstein

A Member of the Firm

230 Park Avenue

New York, New York 10169

Tel.: (212) 661-9100

Fax: (212) 682-6104

asilverstein@otterbourg.com

*Attorneys for Melanie L. Cyganowski, as Receiver*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

SECURITIES AND EXCHANGE COMMISSION,  
Plaintiff,

-v-

PLATINUM MANAGEMENT (NY) LLC;  
PLATINUM CREDIT MANAGEMENT, L.P.;  
MARK NORDLICHT;  
DAVID LEVY;  
DANIEL SMALL;  
URI LANDESMAN;  
JOSEPH MANN;  
JOSEPH SANFILIPPO; and  
JEFFREY SHULSE,

Defendants.

No. 16-cv-6848 (BMC)(VMS)

ECF CASE

----- X

**[PROPOSED] ORDER APPROVING FIRST APPLICATION OF COOLEY LLP FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
INCURRED FROM DECEMBER 19, 2016 THROUGH MARCH 31, 2017**

THIS MATTER coming before the Court on the First Application of Cooley LLP (“Cooley”) for Allowance of Compensation and Reimbursement of Expenses Incurred from December 19, 2016 Through March 31, 2017 (the “Cooley First Interim Application”) [Dkt. No. 144] and the November 20, 2017 Notice regarding the Cooley Application submitted by Melanie L. Cyganowski, the duly appointed Receiver in this action [Docket No. 284]; and the Court having considered the Cooley Application and exhibits and other documents filed in support of the Cooley First Interim Application; and the Court having found that the Cooley First Interim Application complies with applicable standards for awarding fees and expenses; and after due deliberation and for good and sufficient cause show; it is hereby:

**ORDERED** that the Cooley First Interim Application for the period covering December 19, 2016 through March 31, 2017 (the “First Application Period”); is granted in part; and it is further

**ORDERED** that fifty-five percent (55%) of the the fees requested by Cooley for the First Interim Application Period are allowed on an interim basis in the amount of \$548,088.49 (the “Allowed Fees”); and it is further

**ORDERED** that Cooley’s request to be reimbursed for its out-of-pocket expenses for the First Interim Application Period is allowed on an interim basis in the amount of \$7,495.57 (the “Allowed Expenses”); and it is further

**ORDERED** that the Receiver is authorized to immediately pay Cooley \$548,088.49 from the Receivership assets on account of its Allowed Fees and \$7,495.57 on account of its Allowed Expenses; and it is further

**ORDERED**, that Cooley may seek allowance of any fees held back on its First Interim Application and any fees and expenses incurred subsequent to the time period covered by the First Interim Application in connection with the Court’s consideration of final fee applications.

Dated: Brooklyn, New York  
December \_\_, 2017

**SO ORDERED:**

---

THE HON. BRIAN M. COGAN  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK