

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

No. 16-cv-6848 (DLI)

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. :

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**NOTICE BY MELANIE L. CYGANOWSKI, AS RECEIVER, OF:  
(I) OPPOSITION TO APPLICATION OF SCHAFER AND WEINER, PLLC FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
INCURRED FROM DECEMBER 19, 2016 THROUGH JUNE 13, 2017; AND  
(II) CROSS-MOTION FOR DISGORGEMENT OF PREVIOUSLY PAID LEGAL FEES**

**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law, Melanie L. Cyganowski, the duly appointed Receiver (the “*Receiver*”) of Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP (“*PPCO*”), Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd and Platinum Partners Credit Opportunities Fund International (A) Ltd (collectively, the “*Receivership Entities*” or “*Platinum*”), through her counsel, Otterbourg P.C.,

respectfully, before the Honorable Brian M. Cogan, United States District Judge for the United States District Court for the Eastern District of New York, located at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201,; (i) opposes the Motion for an Order Granting the Final Application of Schafer and Weiner, PLLC (“*S&W*”) for Allowance of Compensation and Reimbursement of Expenses Incurred from December 19, 2016 through June 13, 2017, Dkt. No. 326 (the “*Application*”); and (ii) Cross-Moves for Disgorgement of Legal Fees Previously Paid to S&W (the “*Cross-Motion*”).

**PLEASE TAKE FURTHER NOTICE** that any opposition to the Cross-Motion 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 June 11, 2018.

**PLEASE TAKE FURTHER NOTICE** that, in the absence of any timely filed or served written opposition, the Court may grant the relief requested in the Cross-Motion, without further hearing or notice.

Dated: June 5, 2018

OTTERBOURG P.C.

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*Attorneys for Melanie L. Cyganowski, as Receiver*