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JUN 11 2018 ★

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June 6, 2018

Via Facsimile

Honorable Brian M. Cogan
Judge, United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

DOCKET & FILE

Re: Securities and Exchange Commission v. Platinum Management (NY) LLC, Civil Case No. 16-6848

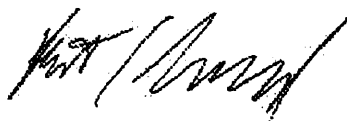
Dear Judge Cogan:

Pursuant to direction from the Clerk of Courts, I am writing you regarding the above matter. I, along with my colleague David Dirisamer, represent Navidea Biopharmaceuticals, Inc. ("Navidea") in Platinum-Montaur Life Sciences, LLC v. Navidea Biopharmaceuticals, Inc., United States District Court for the Southern District of New York, Case No. 1:17-cv-09591 (the "Navidea Litigation"). I have been admitted Pro Hac Vice in the Southern District of New York in the Navidea Litigation, as has Mr. Dirisamer. Navidea, in the Navidea Litigation, seeks to assert a third-party complaint against Platinum Partners Credit Opportunities Master Fund LP ("PPCO").

Navidea recognizes PPCO is a part of the Receivership Estate in this case. Therefore, Navidea will file a motion seeking to lift the litigation stay to permit Navidea to raise its Third Party Complaint against PPCO. To do so, we first plan to seek Pro Hac Vice admission in this Court for this case. However, because Navidea is not currently a party to this case, we are currently unable to seek Pro Hac Vice admission as counsel for Navidea, and without Pro Hac Vice admission, we are unable to file any other motions in this Court.

I was instructed to write to you and ask that Navidea be added as a non-interested party in this matter. We will then formally seek Pro Hac Vice admission and, in accordance with your Individual Motion Practice and Rules, file a motion seeking leave to lift the stay of litigation against the Receivership Estate to permit Navidea to proceed with its Third Party Complaint against PPCO.

Sincerely,



Robert C. Folland



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Honorable Brian M. Cogan US District Court, ED of New York 225 CADMAN PLZ E BROOKLYN, NY 11201-1832 United States 6146281416	<i>vendor</i> FedEx <i>ship date</i> 05/25/18 <i>tracking number</i> 781134760010 Obtain Proof of Delivery <i>service</i> FedEx Priority Overnight® <i>packaging</i> FedEx® Envelope	<i>signature</i> Deliver Without Signature <i>options</i> None <i>courtesy quote</i> 12.49 USD Quote may not reflect all accessorial charges																
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Operator <i>name</i> Courtney Dunham <i>phone/ext</i> (614) 628-1416 <i>e-mail</i> Courtney.Dunham@btlaw.com	<table border="1"> <thead> <tr> <th>Date</th> <th>Action</th> <th>By</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>05/29/18</td> <td>Delivered</td> <td>FedEx</td> <td>Signed by: F.FREEDY</td> </tr> <tr> <td>05/25/18</td> <td>En route</td> <td>FedEx</td> <td>Scheduled delivery date: 05/29/18</td> </tr> <tr> <td>05/25/18</td> <td>Created</td> <td>Courtney.Dunham@btlaw.com</td> <td>781134760010 3:29PM</td> </tr> </tbody> </table>	Date	Action	By	Comment	05/29/18	Delivered	FedEx	Signed by: F.FREEDY	05/25/18	En route	FedEx	Scheduled delivery date: 05/29/18	05/25/18	Created	Courtney.Dunham@btlaw.com	781134760010 3:29PM	
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