

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

PLATINUM-BEECHWOOD LITIGATION.

Civil Action No. 18-cv-6658 (JSR)

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MARTIN TROTT and CHRISTOPHER SMITH, as Joint
Official Liquidators and Foreign Representatives of
PLATINUM PARTNERS VALUE ARBITRAGE FUND
L.P. (in Official Liquidation) and PLATINUM
PARTNERS VALUE ARBITRAGE FUND L.P. (in
Official Liquidation),

Civil Action No. 18-cv-10936 (JSR)

Plaintiffs,

-against-

PLATINUM MANAGEMENT (NY) LLC, *et al.*,

Defendants.
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STIPULATION

WHEREAS, on March 29, 2019, Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) and for Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (collectively, "Plaintiffs") filed a Second Amended Complaint in the above-captioned action ("Second Amended Complaint") (Dkt. 285) naming Twosons Corporation ("Twosons") as a Defendant;

WHEREAS, on April 17, 2019, Plaintiffs and Twosons engaged in mediation regarding the claims set forth in the Second Amended Complaint ("Mediation"); and

WHEREAS, as a result of the Mediation and subject to approval by PPVA's liquidation committee and the Grand Court of the Cayman Islands, the Plaintiffs and Twosons have agreed upon proposed settlement terms regarding the claims set forth in the Second Amended Complaint,

and the parties intend to submit a proposed settlement agreement (the "Settlement Agreement") to the Grand Court of the Cayman Islands for the Cayman Court's approval.

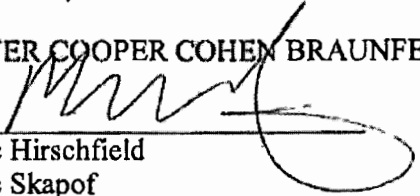
IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the respective parties hereto, that all discovery and briefing obligations and deadlines between Twosons and Plaintiffs are hereby tolled pending approval of the Settlement Agreement by the Grand Court of the Cayman Islands and until further stipulation between Plaintiffs and Twosons; and

IT IS HEREBY FURTHER STIPULATED AND AGREED, that this Stipulation may be filed without further notice and, for the purposes of filing this Stipulation, this Stipulation may be executed in counterparts, which, when taken together, shall constitute the entire Agreement, and that signatures by facsimile and electronic mail should be considered by the Court the same as original signatures; and

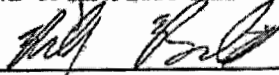
IT IS HEREBY FURTHER STIPULATED AND AGREED, Plaintiffs reserve all rights and remedies at law and equity with respect to Twosons, and Twosons reserves all rights, remedies and defenses at law and equity with respect to Plaintiffs, none of which rights, remedies and defenses are waived.

Dated: April 19, 2019
New York, New York

ROYER COOPER COHEN BRAUNFELD LLC

By: 
Marc Hirschfield
Marc Skapof
1120 Avenue of the Americas, 4th Floor
New York, New York 10036
Telephone: (212) 389-5947
Email: mhirschfield@rceblaw.com
mksapof@rceblaw.com

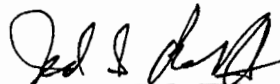
HOLLAND & KNIGHT LLP

By: 
Warren E. Gluck
Richard A. Bixter, Jr.
31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
richard.bixter@hklaw.com

*Attorneys for Defendant
Twosons Corporation*

*Attorneys for Plaintiffs
Martin Trott and Christopher Smith, as
Joint Official Liquidators and Foreign
Representatives of Platinum Partners Value
Arbitrage Fund L.P. (in Official
Liquidation) and for Platinum Partners
Value Arbitrage Fund L.P. (in Official
Liquidation)*

SO ORDERED: _____



**HONORABLE JED S. RAKOFF
UNITED STATES DISTRICT JUDGE**

4-25-19