

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION

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Civil Action No.  
1:18-cv-00658

MELANIE L. CYGANOWSKI, AS RECEIVER,  
BY AND FOR PLATINUM PARTNERS CREDIT  
OPPORTUNITIES MASTER FUND LP, *et al.*,

*Plaintiffs,*

v.

BEECHWOOD RE LTD., *et al.*,

*Defendants.*

Civil Action No.  
1:18-cv-12018

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SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

*Third-Party Plaintiff,*

v.

PB INVESTMENT HOLDINGS LTD., *et al.*,

*Third-Party Defendants.*

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**NOTICE OF PB INVESTMENT HOLDINGS LTD.'S  
MOTION TO DISMISS THE THIRD-PARTY COMPLAINT**

PLEASE TAKE NOTICE that Third-Party Defendant PB Investment Holdings Ltd., as successor-in-interest to Beechwood Bermuda Investment Holdings Ltd. (“PBIHL”), respectfully moves the Court before the Hon. Jed S. Rakoff, United States District Judge, Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order under Fed. R. Civ. P. 8, 9(b), 12(b)(2) and 12(b)(6) dismissing the Third-Party Complaint [ECF 195] filed by Senior Health

Insurance Company of Pennsylvania in the action captioned *Cyganowski v. Beechwood Re Ltd., et al.*, 18-cv-12018, in its entirety as to PBIHL.

PLEASE TAKE FURTHER NOTICE that PBIHL relies on the accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that third-party plaintiffs' response, if any, is due on July 29, 2019, and PBIHL's reply, if any, is due on August 5, 2019.

Dated: July 15, 2019

Respectfully submitted,

**Condon Tobin Sladek Thornton, PLLC**

*/s/ Kendal B. Reed*

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*Attorneys for Defendant/Third-Party Defendant  
PB Investment Holdings Ltd.*

**CERTIFICATE OF SERVICE**

It is hereby certified that on this 15th day of July 2019, a copy of the foregoing was served through the Court's electronic filing system as to all parties who have entered an appearance in this proceeding.

*/s/ Kendal B. Reed*  
Kendal B. Reed