

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

- against -

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

Defendants.

16 Civ. 6848 (BMC)

**MOTION AND [PROPOSED] ORDER OF WITHDRAWAL AS COUNSEL OF
RECORD**

Pursuant to Local Civil Rule 1.4, the undersigned respectfully requests the withdrawal of Quinn Emanuel Urquhart & Sullivan, LLP as counsel of record for Defendants Platinum Management (NY) LLC and Mark Nordlicht. As demonstrated in the accompanying Declaration of William A. Burck, and the proposed consent order of substitution and motion to withdraw as counsel filed in the parallel criminal action, *United States v. Nordlicht*, 16 Cr. 640, Dkt. Nos. 345 & 348, Platinum Management (NY) LLC and Mr. Nordlicht have requested that Quinn Emanuel no longer represent them. Accordingly, Quinn Emanuel respectfully requests that William A. Burck and Daniel R. Koffmann be removed as counsel of record for Mr. Nordlicht.

DATED: New York, NY
June 29, 2018

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ William A. Burck

William A. Burck

Daniel R. Koffmann

51 Madison Ave, 22nd Floor

New York, NY 10010

Telephone: (212) 849-7000

Facsimile: (212) 849-7100

williamburck@quinnemanuel.com

danielkoffmann@quinnemanuel.com

*Attorneys for Defendants Platinum
Management (NY) LLC and Mark Nordlicht*

ENTERED this ____ day of _____, 2018

SO ORDERED

Honorable Brian M. Cogan
United States District Judge

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

- against -

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

Defendants.

16 Civ. 6848 (BMC)

**DECLARATION OF WILLIAM A. BURCK IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL**

I, William A. Burck, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and a member in good standing of the bar of the State of New York and this Court. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 in support of the accompanying motion to withdraw as counsel of record for Defendants Platinum Management (NY) LLC and Mark Nordlicht.

2. As reflected in the proposed consent order of substitution and motion to withdraw filed in the parallel criminal action, *United States v. Nordlicht*, 16 Cr. 640, Dkt. Nos. 345 & 348, Mr. Nordlicht has requested that Quinn Emanuel no longer represent him. The Court granted the substitution and withdrawal motions in the criminal action on June 28, 2018. *See Order, United States v. Nordlicht*, 16 Cr. 640 (June 28, 2018). Platinum Management (NY) LLC and Mr. Nordlicht have requested that Quinn Emanuel no longer represent them in this action, as well.

3. Quinn Emanuel is not asserting a retaining or charging lien.

4. The Complaint in this case was unsealed on December 19, 2016. On July 7, 2017, the Court stayed this action pending resolution of the criminal action. Memorandum and Order, *SEC v. Platinum Mgmt. (NY) LLC*, 16 Civ. 6848, Dkt. No. 217.

5. Because this case is stayed and is still in its early stages, the requested withdrawal will not unnecessarily delay this action. As a result, we respectfully request that the Court grant the motion to withdraw.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 29, 2018

/s/ William A. Burck
William A. Burck