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Via ECF

July 2, 2018

The Honorable Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States Securities and Exchange Commission et al v. Platinum Management (NY) et al*, Case No. 1:16-cv-06848

Request for Extension of Time to File Reply Brief in Support of Motion to Vacate Litigation Stay as to Navidea's Third Party Complaint Against PPCO

Dear Judge Cogan:

Navidea Biopharmaceuticals, Inc. ("Navidea"), through undersigned counsel, and in accordance with your Individual Practices, hereby requests a fourteen (14) day extension of Navidea's deadline to file a reply brief in support of Navidea's Motion to Vacate Litigation Stay as to Navidea's Third Party Complaint Against PPCO (the "Motion to Vacate Stay"). Navidea filed the Motion to Vacate Stay on June 21, 2018. The Receiver filed a memorandum in opposition on June 28, 2018. As a result, Navidea's deadline to file a reply brief in support of the Motion to Vacate Stay is currently July 5, 2018. Navidea requests a fourteen (14) day extension of that deadline, to July 19, 2018.

Navidea has not requested any previous extensions of this deadline. Counsel for the Receiver consents to this extension.

Navidea's counsel requests this extension because of previously scheduled travel plans for the week of July 2. Counsel for the Receiver does not oppose this request.

The Court has previously waived the requirement of a pre-motion conference for the Motion to Vacate Stay, there are no other pending deadlines related to the Motion to Vacate Stay, and this brief extension will not affect any other case deadlines.

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This extension is necessary for Navidea's counsel to fully evaluate and respond to, the arguments raised by the Receiver in opposition to the Motion to Vacate Stay, in light of Navidea's counsel's scheduled travel surrounding the Fourth of July holiday.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert C. Folland", written in a cursive style.

Robert C. Folland

Cc: Counsel of Record via ECF
Via U.S. Mail to:
Andrew M. Calamari
Matthew C.R. Ziegler
Monica Ann Friedman