

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

Master Docket No. 1:18-cv-06658-JSR

MELANIE L. CYGANOWSKI, as Equity  
Receiver for PLATINUM PARTNERS  
CREDIT OPPORTUNITIES MASTER  
FUND LP, PLATINUM PARTNERS  
CREDIT OPPORTUNITIES FUND (TE)  
LLC, PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND LLC,  
PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND  
INTERNATIONAL LTD., PLATINUM  
PARTNERS CREDIT OPPORTUNITIES  
FUND INTERNATIONAL (A) LTD., and  
PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (BL) LLC,  
Plaintiffs,

18-cv-12018-JSR

**NOTICE OF MOTION TO  
DISMISS THE THIRD-PARTY  
COMPLAINT OF SENIOR  
HEALTH INSURANCE COMPANY  
OF PENNSYLVANIA**

v.

BEECHWOOD RE LTD., *et al.*,  
Defendants.

SENIOR HLEATH INSURANCE COMPANY OF  
PENNSYLVANIA, Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., *et al.*,  
Third-Party Defendants.

**PLEASE TAKE NOTICE** that Third-Party Defendant Lawrence Partners, LLC, upon its accompanying Memorandum of Law, will move, by and through its undersigned counsel, before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 14B, New York, New York 10007, at such date as the Court will determine, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with

prejudice the Third-Party Complaint of Senior Health Insurance Company of Pennsylvania (ECF No. 195).

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 2(d) of the Individual Rules of Practice before this Court, answering papers are due by July 29, 2019, and reply papers are due on August 5, 2019. Oral argument is scheduled for August 12, 2019 at 9:00 a.m.

Date: July 16, 2019

Respectfully submitted,

MORRISON COHEN LLP

/s/ Donald H. Chase

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*Lawrence Partners, LLC*

To (via ECF): All counsel of record