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August 8, 2018

VIA ECF AND FEDERAL EXPRESS

Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: SEC v Platinum Mgmt, (NY) LLC et al.,
Case No. 1:16-cv-06848-BMC**

Dear Judge Cogan:

This letter is jointly submitted by, on the one hand, counsel to Melanie L. Cyganowski the duly appointed receiver (the "Receiver") of Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP ("PPCO"), Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd and Platinum Partners Credit Opportunities Fund International (A) Ltd, and on the other hand, Norman Klein, counsel to Schafer and Weiner, PLLC ("S&W" together with the Receiver, the "Parties").

Your Honor entered an order setting a discovery and briefing schedule (DN 346), which included a deadline for completion of depositions on August 17, 2018. The Receiver wishes to take the deposition of the Honorable Steven W. Rhodes (Ret.), the expert retained by S&W, and Michael E. Baum, a member of S&W who was the principle attorney involved in these proceedings. Judge Rhodes and Michael E. Baum will be on the East Coast at the end of August. S&W offered to have the Receiver take the deposition of Judge Rhodes and Michael E. Baum prior to the August 18, 2018 deadline in Bloomfield Hills, Michigan. They have also offered to have the Receiver take the depositions in New York, during the last week of August. The Parties would prefer to have both depositions occur at the end of August in New York.

Accordingly, the Parties respectfully request your Honor to extend the deadline for the taking of depositions to August 31, 2018 to allow these depositions to occur in New York in a timely manner. The Parties also believe that it is necessary to extend the remainder of the discovery and briefing schedule, and further respectfully request Your Honor to extend the deadline for submitting supplemental briefs from September 7, 2018 to September 28, 2018.

Thank you for your continued consideration in these matters.

Respectfully submitted,

/s/Erik B. Weinick
Erik B. Weinick,
*Counsel for Melanie L. Cyganowski,
as Receiver*

/s/Norman Klein
Norman Klein,
Counsel for Schafer and Weiner, PLLC

c: Melanie L. Cyganowski, Esq.
counsel of Record via ECF