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*Attorney for Defendants Beechwood Capital Group, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., Beechwood Re (in Official Liquidation) s/h/a Beechwood Re Ltd., Beechwood Bermuda International Ltd., BAM Administrative Services, LLC, Illumin Capital Management LP, BBLN-PEDCO Corp., BHLN-PEDCO Corp., Mark Feuer, Scott Taylor, and Dhruv Narain*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION	:	
	:	18-cv-06658 (JSR)
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MARTIN TROTT and CHRISTOPHER SMITH, as	:	
Joint Official Liquidators and Foreign Representatives	:	
of PLATINUM PARTNERS VALUE ARBITRAGE	:	18-cv-10936 (JSR)
FUND L.P. (in Official Liquidation) and PLATINUM	:	
PARTNERS VALUE ARBITRAGE FUND L.P. (in	:	
Official Liquidation),	:	
	:	
Plaintiffs,	:	
	:	
-v-	:	
	:	
PLATINUM MANAGEMENT (NY) LLC, et al.,	:	
	:	
Defendants.	:	
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**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Defendants Beechwood Capital Group, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., Beechwood Re (in Official Liquidation) s/h/a Beechwood Re Ltd., Beechwood

Bermuda International Ltd., BAM Administrative Services, LLC, Illumin Capital Management LP, BBLN-PEDCO Corp., BHLN-PEDCO Corp. (collectively, the “Beechwood Entities”), Mark Feuer, Scott Taylor, and Dhruv Narain (collectively, the “Beechwood Individuals”), upon the accompanying Memorandum of Law and the Declaration of Ira S. Lipsius (with exhibits), dated April 22, 2019, will move, by and through their 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. 9(b) and 12(b)(6) dismissing with prejudice the Second Amended Complaint of Plaintiffs Martin Trott and Christopher Smith, as the Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) as follows: all causes of action brought against the Beechwood Individuals and Illumin Capital Management LP; and all causes of action but the alter ego allegations brought against the Beechwood Entities.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court’s March 28, 2019 Order: (1) Plaintiffs must file their answering papers (if any) by May 13, 2019; (2) Defendants must file their reply papers by May 23, 2019; and (3) Oral argument on the motions to dismiss shall be heard on June 4, 2019 at 10:00 a.m.

Dated: April 22, 2019  
New York, New York

LIPSIUS BENHAIM LAW LLP

By: /s/ Ira S. Lipsius  
Ira S. Lipsius

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To: All counsel of record (via ECF)