

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

WASHINGTON NATIONAL INSURANCE
COMPANY and BANKERS CONSECO LIFE
INSURANCE COMPANY,

Case No. 18 Civ. 12018 (JSR)

Third-Party Plaintiffs,

v.

MARK NORDLICHT, ET AL.,

Third-Party Defendants.

**STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANT
DANIEL SAKS' TIME TO ANSWER THE THIRD-PARTY COMPLAINT
OF WASHINGTON NATIONAL INSURANCE COMPANY AND
BANKERS CONSECO LIFE INSURANCE COMPANY**

WHEREAS, Third-Party Plaintiffs Washington National Insurance Company and Bankers Conseco Life Insurance Company (together, "Plaintiffs") filed their Third-Party Complaint ("TPC") in the above-captioned litigation on March 27, 2019;

WHEREAS, Third-Party Defendant Daniel Saks ("Saks" and together with Plaintiffs, the "Parties") moved to dismiss the TPC;

WHEREAS, the Court granted in part and denied in part Saks' Motion to Dismiss in its bottom-line Order dated August 18, 2019;

WHEREAS, the Parties have agreed to provide more time for Saks to respond to the TPC;

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties through their undersigned attorneys, that Saks' time to answer the TPC shall be extended to September 27, 2019. No provision of this Stipulation shall be construed as a waiver of any party's claims or defenses and each party expressly reserves all rights as to the same. This is the first request for extension of Saks' time to answer the TPC.

Dated: September 12, 2019
New York, NY

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Washington National Insurance Company
and Bankers Conseco Life Insurance
Company*

SO ORDERED.

HON. JED S. RAKOFF, U.S.D.J.