

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

MARTIN TROTT and CHRISTOPHER
SMITH, as 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),

Case No. 18 Civ. 10936 (JSR)

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC,
et al.,

Defendants.

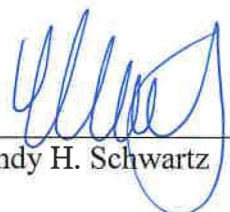
DECLARATION OF WENDY H. SCHWARTZ

I, WENDY H. SCHWARTZ, hereby declare under penalty of perjury, pursuant to 28
U.S.C. § 1746:

1. I am a partner at Binder & Schwartz LLP, counsel for Daniel Saks in the above-captioned litigation.

2. Attached is a true and correct copy of an email exchange dated May 9, 2019 between myself and counsel for Plaintiffs in the above-captioned litigation, regarding the dates of Daniel Saks' employment at Platinum Management (NY) LLC and B Asset Manager LP.

Dated: May 23, 2019



Wendy H. Schwartz

Exhibit A

Wendy Schwartz

From: Barbra.Parlin@hklaw.com
Sent: Thursday, May 9, 2019 3:00 PM
To: Wendy Schwartz; john.brownlee@hklaw.com
Cc: Greg Pruden
Subject: RE: Daniel Saks

Hi Wendy – I asked the client to check on this the other day. They agree as to his start date in March – They are still checking on the end date for his time at PMNY – I don't think we have any information as to when he started and stopped at Beechwood so we won't be able to stipulate to those dates, but am still waiting for confirmation. I will ping them again to be sure.

I am not sure why this is such a big deal – put in what you believe are the correct dates and we can deal with it later

Barbra Parlin | Holland & Knight

Partner

Holland & Knight LLP

31 West 52nd Street | New York, NY 10019

Phone 212.513.3210 | Fax 212.385.9010

Cell 917.658.5490

barbra.parlin@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Wendy Schwartz <wschwartz@binderschwartz.com>
Sent: Thursday, May 09, 2019 2:57 PM
To: Parlin, Barbra R (NYC - X73210) <Barbra.Parlin@hklaw.com>; Brownlee, John L (WAS - X71854, TYS - X78053) <john.brownlee@hklaw.com>
Cc: Greg Pruden <gpruden@binderschwartz.com>
Subject: Daniel Saks

[External email]

Hi Barbra –

As we have discussed, the Second Amended Complaint incorrectly alleges the dates that Danny Saks was employed at Platinum and Beechwood. The correct dates are as follows:

Platinum: March 2014 through Sept 14, 2014.

Beechwood: Mid-Sept 2014 through Dec 31, 2015.

Please let us know whether you will stipulate to those dates. We need to have the accurate dates for our motion, due tomorrow, May 10, 2019.

Regards,

Wendy

Wendy H. Schwartz

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* * *

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