

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
 IN RE PLATINUM-BEECHWOOD LITIGATION :
 -----:

 MELANIE L. CYGANOWSKI, AS RECEIVER, BY :
 AND FOR PLATINUM PARTNERS CREDIT : Master Case No. 1:18-cv-06658 (JSR)
 OPPORTUNITIES MASTER FUND LP, PLATINUM:
 PARTNERS CREDIT OPPORTUNITIES FUND (TE):
 LLC, PLATINUM PARTNERS CREDIT : Case No. 1:18-cv-12018 (JSR)
 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, :
 :
 v. :
 :
 BEECHWOOD RE LTD., et al., :
 :
 Defendants. :
 :
 -----X
 WASHINGTON NATIONAL INSURANCE :
 COMPANY and BANKERS CONSECO :
 LIFE INSURANCE COMPANY, :
 :
 Third-Party Plaintiffs, :
 :
 v. :
 :
 MARK NORDLICHT, et al., :
 :
 Third-Party Defendants. :
 :
 -----X

**ANSWER AND AFFIRMATIVE DEFENSES OF LINCOLN INTERNATIONAL LLC
TO THE THIRD-PARTY COMPLAINT OF BANKERS CONSECO LIFE INSURANCE
COMPANY AND WASHINGTON NATIONAL INSURANCE COMPANY**

Third-Party Defendant Lincoln International LLC (“Lincoln”), by its undersigned counsel, hereby answers Counts Five, Eight, Nine, and Thirteen of the third-party complaint of Bankers Conesco Life Insurance Company (“BCLIC”) and Washington National Insurance Company (“WNIC”) (the “Complaint”).

PRELIMINARY STATEMENT

The following are incorporated by reference into Lincoln’s responses to each paragraph of the Complaint.

A. Lincoln is submitting this Answer and Affirmative Defenses only on behalf of itself. Where allegations are made against “Co-conspirators” and third-party defendants as a group, Lincoln’s responses only apply to itself.

B. The Complaint contains purported excerpts from, and references to, a number of documents, which have often been taken out of context. These documents should be considered, if at all, in context and in unmodified form, and Lincoln respectfully refers the Court to the respective documents for their complete and accurate contents.

C. Except as otherwise expressly stated herein, Lincoln expressly denies each and every allegation contained in the Complaint, including without limitation any allegations contained in headings, subheadings, footnotes, and exhibits of the Complaint, and specifically denies any liability to BCLIC and WNIC (together, “Third-Party Plaintiffs”).

D. Lincoln expressly reserves the right to seek to amend and/or supplement its Answer as may be appropriate or necessary.

RESPONSE TO SPECIFIC ALLEGATIONS

AND NOW, incorporating the foregoing, Lincoln responds to the specific allegations in the Complaint as follows:

Response to Complaint Paragraph No. 470:

Lincoln denies that it is a co-conspirator and denies the allegations in Paragraph 470 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 470 and therefore denies those allegations.

Response to Complaint Paragraph No. 471:

Lincoln denies the allegations in Paragraph 471 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 472:

Lincoln denies the allegations in Paragraph 472 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 473:

Lincoln denies the allegations in Paragraph 473 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 474:

Lincoln denies the allegations in Paragraph 474 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 475:

Lincoln denies the allegations in Paragraph 475 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 476:

Lincoln denies the allegations in the first sentence of Paragraph 476. Lincoln admits the remaining allegations in Paragraph 476.

Response to Complaint Paragraph No. 477:

Lincoln admits the allegations in Paragraph 477.

Response to Complaint Paragraph No. 478:

Lincoln denies the allegations in Paragraph 478 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 479:

Lincoln denies the allegations in Paragraph 479 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 480:

Lincoln denies the allegations in Paragraph 480 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 481:

Lincoln denies the allegations in Paragraph 481 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 482:

Lincoln denies the allegations in Paragraph 482 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 483:

Lincoln denies the allegations in Paragraph 483 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 484:

Lincoln denies the allegations in Paragraph 484 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 485:

Lincoln denies the allegations in Paragraph 485 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 486:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486 and therefore denies those allegations.

Response to Complaint Paragraph No. 487:

Lincoln denies the allegations in Paragraph 487 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 488:

Lincoln denies the allegations in Paragraph 488 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 489:

Lincoln denies the allegations in Paragraph 489 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 490:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490 and therefore denies those allegations.

Response to Complaint Paragraph No. 491:

Lincoln denies the allegations in Paragraph 491 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 492:

Lincoln denies the allegations in Paragraph 492 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 493:

Lincoln denies the allegations in Paragraph 493 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 494:

Lincoln denies the allegations in Paragraph 494 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 495:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 495 and therefore denies those allegations. Lincoln denies the remaining allegations in Paragraph 495.

Response to Complaint Paragraph No. 496:

Lincoln denies the allegations in Paragraph 496 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 496 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 497:

Lincoln denies the allegations in Paragraph 497 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 498:

Lincoln denies the allegations in Paragraph 498 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 499:

Lincoln denies the allegations in Paragraph 499 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 499 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 500:

Lincoln denies the allegations in Paragraph 500 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 501:

Lincoln denies the allegations in Paragraph 501 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 502:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502 and therefore denies those allegations.

Response to Complaint Paragraph No. 503:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503 and therefore denies those allegations.

Response to Complaint Paragraph No. 504:

Lincoln denies the allegations in Paragraph 504 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 505:

Lincoln denies the allegations in Paragraph 505 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 506:

Lincoln denies the allegations in Paragraph 506 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 507:

Lincoln denies the allegations in Paragraph 507 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 508:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508 and therefore denies those allegations.

Response to Complaint Paragraph No. 509:

Lincoln denies the allegations in Paragraph 509 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 510:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 511:

Lincoln denies the allegations in Paragraph 511 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 512:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512 and therefore denies those allegations.

Response to Complaint Paragraph No. 513:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513 and therefore denies those allegations.

Response to Complaint Paragraph No. 514:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514 and therefore denies those allegations.

Response to Complaint Paragraph No. 515:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515 and therefore denies those allegations.

Response to Complaint Paragraph No. 516:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516 and therefore denies those allegations.

Response to Complaint Paragraph No. 517:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517 and therefore denies those allegations.

Response to Complaint Paragraph No. 518:

Lincoln denies the allegations in Paragraph 518 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 518 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 519:

Lincoln denies the allegations in Paragraph 519 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 520:

Lincoln denies the allegations in Paragraph 520 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 521:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521 and therefore denies those allegations.

Response to Complaint Paragraph No. 522:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 522 and therefore denies those allegations.

Response to Complaint Paragraph No. 523:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523 and therefore denies those allegations.

Response to Complaint Paragraph No. 524:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524 and therefore denies those allegations.

Response to Complaint Paragraph No. 525:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525 and therefore denies those allegations.

Response to Complaint Paragraph No. 526:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526 and therefore denies those allegations.

Response to Complaint Paragraph No. 527:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527 and therefore denies those allegations.

Response to Complaint Paragraph No. 528:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 528 and therefore denies those allegations.

Response to Complaint Paragraph No. 529:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529 and therefore denies those allegations.

Response to Complaint Paragraph No. 530:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530 and therefore denies those allegations.

Response to Complaint Paragraph No. 531:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531 and therefore denies those allegations.

Response to Complaint Paragraph No. 532:

Lincoln denies the allegations in Paragraph 532 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 533:

Lincoln denies the allegations in Paragraph 533 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 534:

Lincoln denies the allegations in Paragraph 534 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 535:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535 and therefore denies those allegations.

Response to Complaint Paragraph No. 536:

Lincoln denies the allegations in Paragraph 536 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 537:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537 and therefore denies those allegations.

Response to Complaint Paragraph No. 538:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538 and therefore denies those allegations.

Response to Complaint Paragraph No. 539:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539 and therefore denies those allegations.

Response to Complaint Paragraph No. 540:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 540 and therefore denies those allegations.

Response to Complaint Paragraph No. 541:

Lincoln denies the allegations in Paragraph 541 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 542:

Lincoln denies the allegations in Paragraph 542 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 543:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543 and therefore denies those allegations.

Response to Complaint Paragraph No. 544:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544 and therefore denies those allegations.

Response to Complaint Paragraph No. 545:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545 and therefore denies those allegations.

Response to Complaint Paragraph No. 546:

Lincoln denies the allegations in Paragraph 546 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 547:

Lincoln denies the allegations in Paragraph 547 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 548:

Lincoln denies the allegations in Paragraph 548 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 549:

Lincoln denies the allegations in Paragraph 549 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 549 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 550:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550 and therefore denies those allegations.

Response to Complaint Paragraph No. 551:

Lincoln denies the allegations in Paragraph 551 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 552:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552 and therefore denies those allegations.

Response to Complaint Paragraph No. 553:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553 and therefore denies those allegations.

Response to Complaint Paragraph No. 554:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554 and therefore denies those allegations.

Response to Complaint Paragraph No. 555:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555 and therefore denies those allegations.

Response to Complaint Paragraph No. 556:

Lincoln denies the allegations in Paragraph 556 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 557:

Lincoln denies the allegations in Paragraph 557 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 558:

Lincoln denies the allegations in Paragraph 558 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 559:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559 and therefore denies those allegations.

Response to Complaint Paragraph No. 560:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560 and therefore denies those allegations.

Response to Complaint Paragraph No. 561:

Lincoln denies the allegations in Paragraph 561 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 562:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562 and therefore denies those allegations.

Response to Complaint Paragraph No. 563:

Lincoln denies the allegations in Paragraph 563 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 564:

Lincoln denies the allegations in Paragraph 564 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 565:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565 and therefore denies those allegations.

Response to Complaint Paragraph No. 566:

Lincoln denies the allegations in Paragraph 566 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 567:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567 and therefore denies those allegations.

Response to Complaint Paragraph No. 568:

Lincoln denies the allegations in Paragraph 568 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 569:

Lincoln denies the allegations in Paragraph 569 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 570:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570 and therefore denies those allegations.

Response to Complaint Paragraph No. 571:

Lincoln denies the allegations in Paragraph 571 and refers to the December 2013 Lincoln Memo referenced therein and described below for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 572:

Lincoln denies the allegations in Paragraph 572 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 573:

Lincoln denies the allegations in Paragraph 573 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 574:

Lincoln denies the allegations in Paragraph 574 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 575:

Lincoln denies the allegations in Paragraph 575 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 576:

Lincoln denies the allegations in Paragraph 576 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 577:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577 and therefore denies those allegations.

Response to Complaint Paragraph No. 578:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578 and therefore denies those allegations.

Response to Complaint Paragraph No. 579:

Lincoln denies the allegations in Paragraph 579 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 579 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 580:

Lincoln denies the allegations in Paragraph 580 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 581:

Lincoln denies the allegations in Paragraph 581 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 582:

Lincoln denies the allegations in Paragraph 582 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 583:

Lincoln denies the allegations in Paragraph 583 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 584:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584 and therefore denies those allegations.

Response to Complaint Paragraph No. 585:

Lincoln denies the allegations in Paragraph 585 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 586:

Lincoln denies the allegations in Paragraph 586 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 587:

Lincoln denies the allegations in Paragraph 587 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 588:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588 and therefore denies those allegations.

Response to Complaint Paragraph No. 589:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589 and therefore denies those allegations.

Response to Complaint Paragraph No. 590:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590 and therefore denies those allegations.

Response to Complaint Paragraph No. 591:

Lincoln denies the allegations in Paragraph 591 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 592:

Lincoln denies the allegations in Paragraph 592 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 593:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593 and therefore denies those allegations.

Response to Complaint Paragraph No. 594:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594 and therefore denies those allegations.

Response to Complaint Paragraph No. 595:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595 and therefore denies those allegations.

Response to Complaint Paragraph No. 596:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596 and therefore denies those allegations.

Response to Complaint Paragraph No. 597:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 and therefore denies those allegations.

Response to Complaint Paragraph No. 598:

Lincoln denies the allegations in Paragraph 598 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 599:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599 and therefore denies those allegations.

Response to Complaint Paragraph No. 600:

Lincoln denies the allegations in Paragraph 600 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 601:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601 and therefore denies those allegations.

Response to Complaint Paragraph No. 602:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602 and therefore denies those allegations.

Response to Complaint Paragraph No. 603:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 and therefore denies those allegations.

Response to Complaint Paragraph No. 604:

Lincoln denies the allegations in Paragraph 604 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 605:

Lincoln denies the allegations in Paragraph 605 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 606:

Lincoln denies the allegations in Paragraph 606 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 607:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607 and therefore denies those allegations.

Response to Complaint Paragraph No. 608:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608 and therefore denies those allegations.

Response to Complaint Paragraph No. 609:

Lincoln denies the allegations in Paragraph 609 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 610:

Lincoln denies the allegations in Paragraph 610 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 611:

Lincoln denies the allegations in Paragraph 611 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 612:

Lincoln denies the allegations in Paragraph 612 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 613:

Lincoln denies the allegations in Paragraph 613 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 614:

Lincoln denies the allegations in Paragraph 614 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 615:

Lincoln denies the allegations in Paragraph 615 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 616:

Lincoln denies the allegations in Paragraph 616 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 617:

Lincoln denies the allegations in Paragraph 617 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 618:

Lincoln denies the allegations in Paragraph 618 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 619:

Lincoln denies the allegations in Paragraph 619 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 620:

Lincoln denies the allegations in Paragraph 620 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 621:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621 and therefore denies those allegations.

Response to Complaint Paragraph No. 622:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 and therefore denies those allegations.

Response to Complaint Paragraph No. 623:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623 and therefore denies those allegations.

Response to Complaint Paragraph No. 624:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624 and therefore denies those allegations.

Response to Complaint Paragraph No. 625:

Lincoln denies the allegations in Paragraph 625 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 626:

Lincoln denies the allegations in Paragraph 626 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 627:

Lincoln denies the allegations in Paragraph 627 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 628:

Lincoln denies the allegations in Paragraph 628 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 629:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629 and therefore denies those allegations.

Response to Complaint Paragraph No. 630:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630 and therefore denies those allegations.

Response to Complaint Paragraph No. 631:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631 and therefore denies those allegations.

Response to Complaint Paragraph No. 632:

Lincoln denies the allegations in Paragraph 632 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 633:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633 and therefore denies those allegations.

Response to Complaint Paragraph No. 634:

Lincoln denies the allegations in Paragraph 634 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 635:

Lincoln denies the allegations in Paragraph 635 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 636:

Lincoln denies the allegations in Paragraph 636 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 637:

Lincoln denies the allegations in Paragraph 637 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 638:

Lincoln denies the allegations in Paragraph 638 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 639:

Lincoln denies the allegations in Paragraph 639 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 640:

Lincoln denies the allegations in Paragraph 640 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 641:

Lincoln denies the allegations in Paragraph 641 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 642:

Lincoln denies the allegations in Paragraph 642 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 643:

Lincoln denies the allegations in Paragraph 643 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 644:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644 and therefore denies those allegations.

Response to Complaint Paragraph No. 645:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645 and therefore denies those allegations.

Response to Complaint Paragraph No. 646:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646 and therefore denies those allegations.

Response to Complaint Paragraph No. 647:

Lincoln denies the allegations in Paragraph 647.

Response to Complaint Paragraph No. 648:

Lincoln denies the allegations in the second and third sentences of Paragraph 648. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 648 and therefore denies those allegations.

Response to Complaint Paragraph No. 649:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649 and therefore denies those allegations.

Response to Complaint Paragraph No. 650:

Lincoln denies the allegations in Paragraph 650 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 651:

Lincoln denies the allegations in Paragraph 651 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 652:

Lincoln denies the allegations in Paragraph 652 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 653:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653 and therefore denies those allegations.

Response to Complaint Paragraph No. 654:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654 and therefore denies those allegations.

Response to Complaint Paragraph No. 655:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655 and therefore denies those allegations.

Response to Complaint Paragraph No. 656:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656 and therefore denies those allegations.

Response to Complaint Paragraph No. 657:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 and therefore denies those allegations.

Response to Complaint Paragraph No. 658:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658 and therefore denies those allegations.

Response to Complaint Paragraph No. 659:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659 and therefore denies those allegations.

Response to Complaint Paragraph No. 660:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 660 and therefore denies those allegations.

Response to Complaint Paragraph No. 661:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661 and therefore denies those allegations.

Response to Complaint Paragraph No. 662:

Lincoln denies the allegations in Paragraph 662 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 663:

Lincoln denies the allegations in Paragraph 663 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 664:

Lincoln denies the allegations in Paragraph 664 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 665:

Lincoln denies the allegations in Paragraph 665 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 666:

Lincoln denies the allegations in Paragraph 666 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 667:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667 and therefore denies those allegations.

Response to Complaint Paragraph No. 668:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668 and therefore denies those allegations.

Response to Complaint Paragraph No. 669:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669 and therefore denies those allegations.

Response to Complaint Paragraph No. 670:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 670 and therefore denies those allegations.

Response to Complaint Paragraph No. 671:

Lincoln denies the allegations in Paragraph 671 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 671 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 672:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672 and therefore denies those allegations.

Response to Complaint Paragraph No. 673:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673 and therefore denies those allegations.

Response to Complaint Paragraph No. 674:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674 and therefore denies those allegations.

Response to Complaint Paragraph No. 675:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675 and therefore denies those allegations.

Response to Complaint Paragraph No. 676:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676 and therefore denies those allegations.

Response to Complaint Paragraph No. 677:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677 and therefore denies those allegations.

Response to Complaint Paragraph No. 678:

Lincoln denies the allegations in Paragraph 678 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 679:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679 and therefore denies those allegations.

Response to Complaint Paragraph No. 680:

Lincoln denies the allegations in Paragraph 680 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 681:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681 and therefore denies those allegations.

Response to Complaint Paragraph No. 682:

Lincoln denies the allegations in Paragraph 682 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 683:

Lincoln denies the allegations in Paragraph 683 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 684:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684 and therefore denies those allegations.

Response to Complaint Paragraph No. 685:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685 and therefore denies those allegations.

Response to Complaint Paragraph No. 686:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686 and therefore denies those allegations.

Response to Complaint Paragraph No. 687:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687 and therefore denies those allegations.

Response to Complaint Paragraph No. 688:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688 and therefore denies those allegations.

Response to Complaint Paragraph No. 689:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689 and therefore denies those allegations.

Response to Complaint Paragraph No. 690:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690 and therefore denies those allegations.

Response to Complaint Paragraph No. 691:

Lincoln denies the allegations in Paragraph 691 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 692:

Lincoln denies the allegations in Paragraph 692.

Response to Complaint Paragraph No. 693:

Lincoln lacks knowledge or information sufficient to form a belief as to whether Will Slota was the Chief Operating Officer of Platinum. Lincoln admits the remaining allegations in Paragraph 693, and refers to the Lincoln Memo described below for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 694:

Lincoln admits the allegations in the first four sentences of Paragraph 694 and refers to the email and non-disclosure letter referenced therein for a complete and accurate statement of their contents. Lincoln denies the allegations in the fourth sentence of Paragraph 694.

Response to Complaint Paragraph No. 695:

Lincoln admits the allegations in Paragraph 695 and refers to the non-disclosure letters referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 696:

Lincoln admits the allegations in Paragraph 696 and refers to the non-disclosure letters referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 697:

Lincoln admits the allegations in footnote 33. Lincoln denies the remaining allegations in Paragraph 697.

Response to Complaint Paragraph No. 698:

Lincoln admits that VOG prepared a memo to Lincoln's Commitment Committee, dated December 11, 2013 (the "Lincoln Memo") and refers to the Lincoln Memo for a complete and accurate statement of its contents. Lincoln denies the remaining allegations in Paragraph 698.

Response to Complaint Paragraph No. 699:

Lincoln denies the allegations in Paragraph 699.

Response to Complaint Paragraph No. 700:

Lincoln denies the allegations in Paragraph 700 and refers to the Lincoln Memo for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 701:

Lincoln denies the allegations in Paragraph 701.

Response to Complaint Paragraph No. 702:

Lincoln denies the allegations in Paragraph 702.

Response to Complaint Paragraph No. 703:

Lincoln denies the allegations in Paragraph 703.

Response to Complaint Paragraph No. 704:

Lincoln denies the allegations in Paragraph 704.

Response to Complaint Paragraph No. 705:

Lincoln admits the allegations in the first sentence of Paragraph 705. Lincoln denies the allegations in the second sentence of Paragraph 705.

Response to Complaint Paragraph No. 706:

Lincoln denies the allegations in Paragraph 706.

Response to Complaint Paragraph No. 707:

Lincoln denies the allegations in Paragraph 707.

Response to Complaint Paragraph No. 708:

Lincoln denies the allegations in Paragraph 708.

Response to Complaint Paragraph No. 709:

Lincoln denies the allegations in Paragraph 709.

Response to Complaint Paragraph No. 710:

Lincoln denies the allegations in Paragraph 710 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 711:

Lincoln denies the allegations in Paragraph 711 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711 as to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 712:

Lincoln denies the allegations in Paragraph 712.

Response to Complaint Paragraph No. 713:

Lincoln denies the allegations in Paragraph 713, and to the extent that Paragraph 713 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 714:

Lincoln denies the allegations in Paragraph 714, except admits that on March 7, 2014, Lincoln issued to David Levy as CIO of B Asset Manager LP a Negative Assurance Letter. Lincoln refers to the Negative Assurance Letter referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 715:

Lincoln denies the allegations in the last sentence of Paragraph 715. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 715 and therefore denies those allegations.

Response to Complaint Paragraph No. 716:

Lincoln admits that its Negative Assurance Letters and Positive Assurance Valuations contained disclaimers and refers to its Negative Assurance Letters and Positive Assurance Valuations for a complete and accurate statement of their contents. Lincoln denies the remaining allegations in Paragraph 716.

Response to Complaint Paragraph No. 717:

Lincoln denies the allegations in Paragraph 717.

Response to Complaint Paragraph No. 718:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of Paragraph 718 and therefore denies those allegations. Lincoln denies the remaining allegations in Paragraph 718, and refers to its February, April, May, July, August, October, and November 2014 Negative Assurance Letters for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 719:

Lincoln denies the allegations in Paragraph 719.

Response to Complaint Paragraph No. 720:

Lincoln denies the allegations in Paragraph 720.

Response to Complaint Paragraph No. 721:

Lincoln denies the allegations in Paragraph 721.

Response to Complaint Paragraph No. 722:

Lincoln denies the allegations in Paragraph 722.

Response to Complaint Paragraph No. 723:

Lincoln denies the allegations in Paragraph 723, and to the extent that Paragraph 723 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 724:

Lincoln denies the allegations in Paragraph 724 and refers to the spreadsheet referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 725:

Lincoln denies the allegations in Paragraph 725 and refers to the Negative Assurance Letters referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 726:

Lincoln denies the allegations in Paragraph 726 and refers to the Negative Assurance Letters and Positive Assurance Valuations referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 727:

Lincoln denies the allegations in Paragraph 727 and refers to the emails referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 728:

Lincoln denies the allegations in Paragraph 728.

Response to Complaint Paragraph No. 729:

Lincoln denies the allegations in Paragraph 729.

Response to Complaint Paragraph No. 730:

Lincoln denies the allegations in Paragraph 730.

Response to Complaint Paragraph No. 731:

Lincoln admits that its Negative Assurance Letters and Positive Assurance Valuations each contained disclaimers and refers to its Negative Assurance Letters and Positive Assurance Valuations for a complete and accurate statement of their contents. Lincoln denies the remaining allegations in Paragraph 731.

Response to Complaint Paragraph No. 732:

Lincoln denies the allegations in Paragraph 732.

Response to Complaint Paragraph No. 733:

Lincoln denies the allegations in Paragraph 733 and refers to the Positive Assurance Valuations and Negative Assurance Letters referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 734:

Lincoln denies the allegations in Paragraph 734.

Response to Complaint Paragraph No. 735:

Lincoln denies the allegations in Paragraph 735 and refers to the email and Negative Assurance Letter referenced therein for a complete and accurate statement of their contents.

Response to Complaint Paragraph No. 736:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first and second sentences of Paragraph 736 and therefore denies those allegations. Lincoln denies the remaining allegations in Paragraph 736.

Response to Complaint Paragraph No. 737:

Lincoln denies the allegations in Paragraph 737.

Response to Complaint Paragraph No. 738:

Lincoln denies the allegations in Paragraph 738 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 739:

Lincoln denies the allegations in Paragraph 739 and refers to the draft Negative Assurance Letter referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 740:

Lincoln denies the allegations in Paragraph 740 and refers to the Negative Assurance Letter referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 741:

Lincoln admits that on March 21, 2014, Lincoln sent Beechwood a draft of its first quarterly Positive Assurance Valuation for ALS and Golden Gate, and on April 8, 2014, Lincoln sent Beechwood its final Positive Assurance Valuation as of March 31, 2014, and refers to the draft Q1 Positive Assurance Valuation and final Q1 Positive Assurance Valuation referenced therein for a complete and accurate statement of their contents. Lincoln denies the remaining allegations in Paragraph 741.

Response to Complaint Paragraph No. 742:

Lincoln denies the allegations in Paragraph 742.

Response to Complaint Paragraph No. 743:

Lincoln denies the allegations in Paragraph 743.

Response to Complaint Paragraph No. 744:

Lincoln denies the allegations in Paragraph 744.

Response to Complaint Paragraph No. 745:

Lincoln denies the allegations in Paragraph 745.

Response to Complaint Paragraph No. 746:

Lincoln denies the allegations in Paragraph 746.

Response to Complaint Paragraph No. 747:

Lincoln denies the allegations in Paragraph 747.

Response to Complaint Paragraph No. 748:

Lincoln denies the allegations in Paragraph 748 and refers to the QI Positive Assurance Valuation for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 749:

Lincoln denies the allegations in Paragraph 749 and refers to the document referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 750:

Lincoln denies the allegations in Paragraph 750.

Response to Complaint Paragraph No. 751:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first three sentences of footnote 39 to Paragraph 751 and the first sentence of footnote 40 to Paragraph 751 and therefore denies those allegations. Lincoln denies the remaining allegations in Paragraph 751.

Response to Complaint Paragraph No. 752:

Lincoln admits that its valuation reports contained disclaimers and refers to its valuation reports for a complete and accurate statement of their contents. Lincoln denies the remaining allegations in Paragraph 752.

Response to Complaint Paragraph No. 753:

Lincoln admits it was a sophisticated financial services firm with an established valuations practice group. Lincoln denies the remaining allegations in Paragraph 753 and refers to the Lincoln Memo for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 754:

Lincoln denies the allegations in Paragraph 754.

Response to Complaint Paragraph No. 755:

Lincoln denies the allegations in Paragraph 755 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 756:

Lincoln denies the allegations in the first two sentences of Paragraph 756. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the third sentence of Paragraph 756 and therefore denies those allegations.

Response to Complaint Paragraph No. 757:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the third sentence of Paragraph 757 and therefore denies those allegations. Lincoln denies the remaining allegations in Paragraph 757.

Response to Complaint Paragraph No. 758:

Lincoln denies the allegations in Paragraph 758 and refers to the non-reliance letter referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 759:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759 and therefore denies those allegations.

Response to Complaint Paragraph No. 760:

Lincoln denies the allegations in Paragraph 760.

Response to Complaint Paragraph No. 761:

Lincoln denies the allegations in Paragraph 761.

Response to Complaint Paragraph No. 762:

Lincoln denies the allegations in Paragraph 762, and to the extent that Paragraph 762 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 763:

Lincoln denies the allegations in Paragraph 763.

Response to Complaint Paragraph No. 764:

Lincoln denies the allegations in Paragraph 764.

Response to Complaint Paragraph No. 765:

Lincoln denies the allegations in Paragraph 765.

Response to Complaint Paragraph No. 766:

Lincoln denies the allegations in Paragraph 766.

Response to Complaint Paragraph No. 767:

Lincoln denies the allegations in Paragraph 767 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 768:

Lincoln denies the allegations in Paragraph 768 and refers to the draft Q4 Positive Assurance Valuation for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 769:

Lincoln denies the allegations in Paragraph 769 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 770:

Lincoln admits it terminated the Beechwood relationship. Lincoln denies the remaining allegations in Paragraph 770.

Response to Complaint Paragraph No. 771:

Lincoln denies the allegations in Paragraph 771 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 772:

Lincoln denies the allegations in Paragraph 772, and to the extent that Paragraph 772 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 773:

Lincoln admits it disengaged from Beechwood and denies the remaining allegations in Paragraph 773.

Response to Complaint Paragraph No. 774:

Lincoln denies the allegations in Paragraph 774 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 775:

Lincoln denies the allegations in Paragraph 775 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 776:

Lincoln denies the allegations in Paragraph 776, except Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of Paragraph 776 and therefore denies those allegations.

Response to Complaint Paragraph No. 777:

Lincoln denies the allegations in Paragraph 777, and to the extent that Paragraph 777 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 778:

Lincoln denies the allegations in Paragraph 778, and to the extent that Paragraph 778 purports to quote or paraphrase the contents of a document, Lincoln refers to that document for a complete and accurate statement of its contents..

Response to Complaint Paragraph No. 779:

Lincoln denies the allegations in Paragraph 779.

Response to Complaint Paragraph No. 780:

Lincoln admits that on March 9, 2015, Lincoln sent B Asset Manager LLP a Notice of Termination letter dated February 19, 2015. Lincoln denies the remaining allegations in Paragraph 780 and refers to the email referenced therein for a complete and accurate statement of its contents.

Response to Complaint Paragraph No. 781:

Lincoln denies the allegations in Paragraph 781.

Response to Complaint Paragraph No. 782:

Lincoln denies the allegations in Paragraph 782.

Response to Complaint Paragraph No. 783:

Lincoln denies the allegations in Paragraph 783.

CLAIMS FOR RELIEF

COUNT ONE

**Violation of Civil RICO — 18 U.S.C. § 1962(C)
(Against Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat, Narain, Holdings, RAM,
RAM Administrative, BBL, BBIL, PB Investment,
as successor-in-interest to BBIH, Beechwood Investments
and each Series, Beechwood Trusts Nos. 1-20 and Lincoln)**

Pursuant to the Court's order dated August 19, 2019, Lincoln is not required to respond to the allegations in Paragraphs 784 to 793 because these allegations have been dismissed. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 784 to 793

as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 784 to 793 as they relate to any other party and therefore denies those allegations

COUNT TWO

**RICO Conspiracy – 18 U.S.C. § 1962(d)
(Against Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat, Narain, Holdings, BAM,
BAM Administrative, BBL, BBIL, PB Investment,
as successor-in-interest to BBIH, Beechwood Investments
and each Series, Beechwood Trusts Nos. 1-20 and Lincoln)**

Pursuant to the Court's order dated August 19, 2019, Lincoln is not required to respond to the allegations in Paragraphs 794 to 799 because these allegations have been dismissed. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 794 to 799 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 794 to 799 as they relate to any other party and therefore denies those allegations.

COUNT THREE

**Fraudulent Inducement and Fraud
(Against Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat and Narain)**

Lincoln is not required to respond to the allegations in Paragraphs 800 to 807 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 800 to 807 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 800 to 807 as they relate to any other party and therefore denies those allegations.

COUNT FOUR

**Fraudulent Inducement and Fraud
(Against BBL, BBIL and PB Investment,
as successor-in-interest to BBIH)**

Lincoln is not required to respond to the allegations in Paragraphs 808 to 815 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 808 to 815 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 808 to 815 as they relate to any other party and therefore denies those allegations.

COUNT FIVE

**Fraudulent Misrepresentation and Omission
(Against Lincoln)**

Response to Complaint Paragraph No. 816:

Lincoln incorporates each and every response to the allegations set forth above.

Response to Complaint Paragraph No. 817:

Lincoln denies the allegations in Paragraph 817.

Response to Complaint Paragraph No. 818:

Lincoln denies the allegations in Paragraph 818.

Response to Complaint Paragraph No. 819:

Lincoln denies the allegations in Paragraph 819.

Response to Complaint Paragraph No. 820:

Lincoln denies the allegations in Paragraph 820.

Response to Complaint Paragraph No. 821:

Lincoln denies the allegations in Paragraph 821.

Response to Complaint Paragraph No. 822:

Lincoln denies the allegations in Paragraph 822.

Response to Complaint Paragraph No. 823:

Lincoln denies the allegations in Paragraph 823.

Response to Complaint Paragraph No. 824:

Lincoln denies the allegations in Paragraph 824.

Response to Complaint Paragraph No. 825:

Lincoln denies the allegations in Paragraph 825.

COUNT SIX

**Negligent Misrepresentation
(Against Lincoln)**

Pursuant to the Court's order dated August 19, 2019, Lincoln is not required to respond to the allegations in Paragraphs 826 to 834 because these allegations have been dismissed. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 826 to 834.

COUNT SEVEN

**Aiding and Abetting Fraud
(Against Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat, Narain, Holdings, HAM, DAM Administrative,
BBL, BBIL, PB Investment, Beechwood Investments
and each Series and Beechwood Trusts Nos. 1-20)**

Lincoln is not required to respond to the allegations in Paragraphs 835 to 843 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 835 to 843 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 835 to 843 as they relate to any other party and therefore denies those allegations.

COUNT EIGHT

**Aiding and Abetting Fraud
(Against Lincoln)**

Response to Complaint Paragraph No. 844:

Lincoln incorporates each and every response to the allegations set forth above.

Response to Complaint Paragraph No. 845:

Lincoln denies the allegations in Paragraph 845 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 845 as they relate to any other party and therefore denies those allegations.

Response to Complaint Paragraph No. 846:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 846 and therefore denies those allegations.

Response to Complaint Paragraph No. 847:

Lincoln denies the allegations in Paragraph 847.

Response to Complaint Paragraph No. 848:

Lincoln denies the allegations in Paragraph 848.

Response to Complaint Paragraph No. 849:

Lincoln denies the allegations in Paragraph 849.

Response to Complaint Paragraph No. 850:

Lincoln denies the allegations in Paragraph 850.

Response to Complaint Paragraph No. 851:

Lincoln denies the allegations in Paragraph 851.

Response to Complaint Paragraph No. 852:

Lincoln denies the allegations in Paragraph 852.

COUNT NINE

**Conspiracy to Commit Fraud
(Against Lincoln)**

Response to Complaint Paragraph No. 853:

Lincoln incorporates each and every response to the allegations set forth above.

Response to Complaint Paragraph No. 854:

Lincoln denies the allegations in Paragraph 854.

Response to Complaint Paragraph No. 855:

Lincoln denies the allegations in Paragraph 855.

Response to Complaint Paragraph No. 856:

Lincoln denies the allegations in Paragraph 856.

Response to Complaint Paragraph No. 857:

Lincoln denies the allegations in Paragraph 857.

Response to Complaint Paragraph No. 858:

Lincoln denies the allegations in Paragraph 858.

Response to Complaint Paragraph No. 859:

Lincoln denies the allegations in Paragraph 859.

Response to Complaint Paragraph No. 860:

Lincoln denies the allegations in Paragraph 860.

COUNT TEN

**Breach of Contract
(Against Beechwood Re)**

Lincoln is not required to respond to the allegations in Paragraphs 861 to 865 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 861 to 865 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 861 to 865 as they relate to any other party and therefore denies those allegations.

COUNT ELEVEN

**Breach of Fiduciary Duty
(Against BAM, BAM Administrative,
Hodgdon, Saks, Kim and Narain)**

Lincoln is not required to respond to the allegations in Paragraphs 866 to 872 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 866 to 872 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 866 to 872 as they relate to any other party and therefore denies those allegations.

COUNT TWELVE

**Aiding and Abetting Breaches of Fiduciary Duty
(Against Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff,
Manela, Ottensoser, Kim, Saks, Poteat, Narain, Holdings,
BAM, BAM Administrative, BBL, BBIL, PB Investment,
as successor-in-interest to BBIH, Beechwood Investments
and each Series and Beechwood Trusts Nos. 1-20)**

Lincoln is not required to respond to the allegations in Paragraphs 873 to 879 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 873 to 879 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 873 to 879 as they relate to any other party and therefore denies those allegations.

COUNT THIRTEEN

**Aiding and Abetting Breach of Fiduciary Duty
(Against Lincoln)**

Response to Complaint Paragraph No. 880:

Lincoln incorporates each and every response to the allegations set forth above.

Response to Complaint Paragraph No. 881:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 881 and therefore denies those allegations.

Response to Complaint Paragraph No. 882:

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 882 and therefore denies those allegations.

Response to Complaint Paragraph No. 883:

Lincoln denies the allegations in Paragraph 883.

Response to Complaint Paragraph No. 884:

Lincoln denies the allegations in Paragraph 884.

Response to Complaint Paragraph No. 885:

Lincoln denies the allegations in Paragraph 885.

Response to Complaint Paragraph No. 886:

Lincoln denies the allegations in Paragraph 886.

Response to Complaint Paragraph No. 887:

Lincoln denies the allegations in Paragraph 887.

Response to Complaint Paragraph No. 888:

Lincoln denies the allegations in Paragraph 888.

COUNT FOURTEEN

**Fraudulent Conveyance — New York Debtor and
Creditor Law §§ 276, 276-a, 278 and 279
(Against BBL, BBIL and PB Investment, as successor-in-interest to BBIH)**

Lincoln is not required to respond to the allegations in Paragraphs 889 to 900 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 889 to 900 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 889 to 900 as they relate to any other party and therefore denies those allegations.

COUNT FIFTEEN

**Fraudulent Conveyance — New York Debtor
and Creditor Law §§ 273, 278 and/or 279
(Against BBL, BBIL and PB Investment, as successor-in-interest to BBIH)**

Lincoln is not required to respond to the allegations in Paragraphs 901 to 906 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 901 to 906 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 901 to 906 as they relate to any other party and therefore denies those allegations.

COUNT SIXTEEN

**Fraudulent Conveyance — New York Debtor
and Creditor Law §§ 274, 278 and/or 279
(Against BBL, BB1L and PB Investment., as successor-in-interest to BBIH)**

Lincoln is not required to respond to the allegations in Paragraphs 907 to 912 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 907 to 912 as to itself. Lincoln lacks knowledge or

information sufficient to form a belief as to the truth of the allegations in Paragraphs 907 to 912 as they relate to any other party and therefore denies those allegations.

COUNT SEVENTEEN

**Fraudulent Conveyance — New York Debtor
and Creditor Law §§ 275, 278 and/or 279
(Against BBL, BBIL and PB Investment, as successor-in-interest to BBIH)**

Lincoln is not required to respond to the allegations in Paragraphs 913 to 918 because these allegations are not directed at Lincoln. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 913 to 918 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 913 to 918 as they relate to any other party and therefore denies those allegations.

COUNT EIGHTEEN

**Contribution and Indemnity
(Against Beechwood Re, Feuer, Taylor, Levy, Beechwood Capital Group,
Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat, Narain, Holdings, BAM, SAM Administrative,
BBL, BBIL, PB Investment, as successor-in-interest to BBIH,
Beechwood Investments and each Series,
Beechwood Trusts Nos. 1-20, and Lincoln)**

Pursuant to the Court's order dated August 19, 2019, Lincoln is not required to respond to the allegations in Paragraphs 919 to 922 because these allegations have been dismissed. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 919 to 922 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 919 to 922 as they relate to any other party and therefore denies those allegations.

COUNT NINETEEN

**Unjust Enrichment/Constructive Trust
(Against Nordlicht, Huberfeld, Bodner, Feuer Family Trust,
Taylor-Lau Family Trust, Hodgdon, Slota, Small, Leff, Manela,
Ottensoser, Kim, Saks, Poteat, Narain, Holdings, BAM,
BAM Administrative, BBL, BBIL, PB Investment,
as successor-in-interest to BBIH, Beechwood Investments
and each Series, Beechwood Trusts Nos. 1-20 and Lincoln)**

Pursuant to the Court's order dated August 19, 2019, Lincoln is not required to respond to the allegations in Paragraphs 923 to 926 because these allegations have been dismissed. To the extent a response is required, Lincoln denies each and every allegation in Paragraphs 923 to 926 as to itself. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 923 to 926 as they relate to any other party and therefore denies those allegations.

AFFIRMATIVE DEFENSES

Lincoln reserves the right to rely upon any of the following or any additional defenses to the extent that such defenses are supported by information developed through discovery or by evidence at trial. By asserting the matters below, Lincoln does not admit that Third-Party Plaintiffs are relieved of their burden to prove each element of their claims and the damages or relief sought.

**FIRST AFFIRMATIVE DEFENSE
(Failure to State a Claim)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, because the Complaint fails to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE
(Failure to Plead with Particularity)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, because they fail to plead fraud with particularity in accordance with Federal Rule of Civil Procedure 9(b).

**THIRD AFFIRMATIVE DEFENSE
(Statute of Limitations)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, by applicable statutes of limitations.

**FOURTH AFFIRMATIVE DEFENSE
(*In Pari Delicto*)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, by the doctrine of *in pari delicto*.

**FIFTH AFFIRMATIVE DEFENSE
(Unclean Hands)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, by the doctrine of unclean hands.

**SIXTH AFFIRMATIVE DEFENSE
(Failure to Mitigate)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole in part, by their failure to mitigate, minimize or avoid any damages they may be claiming.

**SEVENTH AFFIRMATIVE DEFENSE
(Third-Party Actions)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, because they rely on or implicate the negligent, intentional, malicious, criminal, and/or otherwise

unlawful acts or omissions of third parties that are not subject to Lincoln's control or authority and for which Lincoln is not responsible and cannot be held liable.

**EIGHTH AFFIRMATIVE DEFENSE
(Good Faith)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, because Lincoln at all times acted in good faith.

**NINTH AFFIRMATIVE DEFENSE
(Disclosures)**

Third-Party Plaintiffs' claims against Lincoln are barred, in whole or in part, by the terms, disclaimers, and disclosures contained in Lincoln's valuations.

**TENTH AFFIRMATIVE DEFENSE
(Duplicative Claims)**

Without admitting that the Complaint states a claim, any remedies are limited to the extent that there is sought an overlapping or duplicative recovery pursuant to the various claims for any alleged single wrong.

**ELEVENTH AFFIRMATIVE DEFENSE
(Punitive Damages Unconstitutional)**

Third-Party Plaintiffs' punitive damages claims against Lincoln have no basis in law or fact, and any award of punitive damages would violate the Due Process Clause, Equal Protection Clause, and the excessive fines provision of the Constitutions of the United States and the State of New York.

JURY DEMAND

Lincoln demands a trial by jury on all issues so triable.

Dated: September 13, 2019

/s/ Lara A. Flath

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*Counsel for Defendant Lincoln International
LLC*

CERTIFICATE OF SERVICE

I hereby certify that, on September 13, 2019, I served the foregoing Answer and Affirmative Defenses of Lincoln International LLC to the Third-Party Complaint of Bankers Conesco Life Insurance Company and Washington National Insurance Company via the Court's electronic filing system on all attorneys of record who have entered an appearance by ECF in this proceeding.

/s/ Lara A. Flath _____

Lara A. Flath