

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD LITIGATION

Consolidated Case No.
18-cv-6658 (JSR)

MELANIE L. CYGANOWSKI, as Equity
Receiver for PLATINUM PARTNERS
CREDIT OPPORTUNITIES MASTER FUND
LP, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC,
PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
INTERNATIONAL LTD., PLATINUM
PARTNERS CREDIT OPPORTUNITIES
INTERNATIONAL (A) LTD., and
PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (BL) LLC,

Civil Action No.
18-cv-12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.

Defendants.

WASHINGTON NATIONAL INSURANCE
COMPANY and BANKERS CONSECO
LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

STIPULATION

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

WHEREAS, Third-Party Plaintiffs Washington National Insurance Company and Bankers Conseco Life Insurance Company (collectively, “Third-Party Plaintiffs”) filed a Summons and Third-Party Complaint (“TPC”) on March 27, 2019 (ECF No. 75);

WHEREAS, Third-Party Defendant Will Slota (“Slota”) moved to dismiss the TPC (ECF No. 231);

WHEREAS, this Court issued an Order dated August 18, 2019 dismissing in part and granting in part Slota’s motion to dismiss the TPC (the “August 18 Order”) (ECF 380);

WHEREAS, Slota has requested additional time to respond to the TPC following the August 18 Order;

WHEREAS, the Third-Party Plaintiffs consent to Slota’s request.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys, as follows:

1. That time for Slota to answer the TPC is extended to, and including, September 17, 2019 without prejudice to each and all of Slota’s rights, remedies and defenses which are hereby reserved except for the defense of lack of proper service of the TPC.

2. This the second request for an extension of time to respond to the TPC (ECF No. 208), and the first request for an extension of time since the August 18 Order.

Dated: New York, NY
September 13, 2019

**COX PADMORE SKOLNIK &
SHAKARCHY LLP**

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SO ORDERED:

Jed S. Rakoff, U.S.D.J.