

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD LITIGATION

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,

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.

Defendants.

WASHINGTON NATIONAL INSURANCE  
COMPANY and BANKERS CONSECO  
LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

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

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

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
ANSWER AMENDED  
CROSSCLAIMS AND THIRD-PARTY  
COMPLAINT**

SENIOR HEALTH INSURANCE  
COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., et al.,

Third-Party Defendants.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys for the parties, that the time within which Third-Party Defendant Will Slota (“Slota”) may answer the Amended Crossclaims and Third-Party Complaint of Senior Health Insurance Company of Pennsylvania (ECF Doc. No. 358) (“SHIP’s Amended TPC”) is hereby extended up to, and including, September 17, 2019.

No provision of this Stipulation and Order shall be construed as a waiver of any party’s claims or defenses and each party expressly reserve any and all of the same.

There has been no previous request for an extension of Slota’s time to answer SHIP’s Amended TPC.

Dated: New York, NY  
September 13, 2019

**COX PADMORE SKOLNIK &  
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina  
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**DLA PIPER LLP**

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SO ORDERED:

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