

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

SENIOR HEALTH INSURANCE COMPANY
OF PENNSYLVANIA,

Third-Party Plaintiff,

Case No. 18 Civ. 12018 (JSR)

v.

PB INVESTMENT HOLDINGS, LTD.,
ET AL.,

Third-Party Defendants.

**STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANT
DANIEL SAKS' TIME TO ANSWER THE THIRD-PARTY COMPLAINT
OF SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA**

WHEREAS, Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania (“SHIP”) filed its Third-Party Complaint (“TPC”) in the above-captioned litigation on May 15, 2019;

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

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

WHEREAS, SHIP filed an Amended TPC on September 4, 2019;

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

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

Dated: September 17, 2019
New York, NY

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Senior Health Insurance Company
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SO ORDERED.

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