

UNITED STATES DISTRICT COURT
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,

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., et al.,

Third-Party Defendants.

**THIRD-PARTY DEFENDANT
WILL SLOTA'S ANSWER TO THE
AMENDED COMPLAINT OF
THIRD-PARTY PLAINTIFF
SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA**

Third-Party Defendant Will Slota (“Third-Party Defendant” or “Slota”), by and through his counsel, as and for his Answer to the Amended Crossclaims and Third Party Complaint (“ATPC”) of Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania (“Third-Party Plaintiff” or “SHIP”) herein, dated September 3, 2019, alleges as follows:

To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in the ATPC support Counts Five and Seven of the ATPC as against Slota, such causes of action were dismissed by Order of this Court dated August 18, 2019. Pursuant to such dismissal, no responsive pleading is required.

NATURE OF THE ACTION

1. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

2. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota.

To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

3. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

4. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

5. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

THE PARTIES AND OTHER KEY PLAYERS

6. Slota denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph directed at individuals or entities other than Slota.

7. Slota denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

8. Slota denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such

allegations are denied.

9. Slota denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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denied.

39. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

40. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

41. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota,

[REDACTED]

[REDACTED] To the extent the allegations of this paragraph are directed at, such allegations are denied.

42. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota,. To the extent the allegations of this paragraph are directed at Slota or state, such allegations are denied.

43. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

44. Slota denies knowledge or information sufficient to form a belief as to the

truth of the allegations in this paragraph directed at individuals or entities other than Slota, [REDACTED] To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

45. Slota denies the allegation in this paragraph, [REDACTED]
[REDACTED]
[REDACTED]

46. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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JURISDICTION AND VENUE

50. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and respectfully refers all questions of law to this Honorable Court.

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FACTUAL BACKGROUND

A. The Development of the Platinum-Beechwood Scheme

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i. Beechwood's Ownership Structure

83. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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ii. Beechwood and Platinum had Shared Management and Control and are In Fact Integrated Companies

103. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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B. CNO Reinsurance Agreements

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C. Beechwood Misrepresentations to Induce SHIP to Eneter Into the IMAs

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D. The Investment Management Agreements

162. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

i. The BBIL IMA

163. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

164. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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ii. The Beechwood Re IMA

183. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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iii. The BAM IMA and Side Letter

200. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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E. The Platinum-Beechwood Scheme Goes Into Against SHIP

232. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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i. Beechwood Partakes in Numerous Related-Party Transactions

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a. Montsant Partners LLC

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b. PEDEVCO Corp.

257. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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c. Agera Energy

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318. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

319. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

320. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

ii. **Beechwood Overvalues Investments and Collects Performance Fees as a Result**

321. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

322. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

323. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

324. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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329. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

330. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

331. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

332. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

333. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

334. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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344. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

iii. Beechwood Takes Performance Fees

345. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

346. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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366. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

iv. Continued Concealment

367. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

368. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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372. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

v. **Transfer of Beechwood Investments Made with CNO Assets to SHIP**

373. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

374. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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vi. **The Unjust Profits from the Platinum-Beechwood Scheme are Hidden From Creditors**

379. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

380. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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383. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

F. Revelation of the Fraudulent Platinum-Beechwood Scheme and Further Concealment

384. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

385. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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409. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

COUNT ONE

Aiding and Abetting Fraud (Against the Co-Conspirator Defendants)

410. With respect to Paragraph “410” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “409” of this Answer.

411. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

412. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

413. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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417. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

418. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

COUNT TWO

**Aiding and Abetting Breach of Fiduciary Duty
(Against the Co-Conspirator Defendants)**

419. With respect to Paragraph “419” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “418” of this Answer.

420. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

421. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

422. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

423. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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427. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

428. Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

COUNT THREE

Aiding and Abetting Fraud (Against the Beechwood Owner Trusts, the BRILLC Series Entities, the BRILLC Series Members, and the Trustees for the 2016 Acquisition Trusts)

429. With respect to Paragraph “429” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “428” of this Answer.

430. This Count is not alleged against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

431. This Count is not alleged against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient

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COUNT FOUR

**Aiding and Abetting Breach of Fiduciary Duty
(Against the Beechwood Owner Trusts, the BRILLC Series Entities, the BRILLC Series Members, and the Trustees for the 2016 Acquisition Trusts)**

439. With respect to Paragraph “439” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “438” of this Answer.

440. This Count is not alleged against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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COUNT FIVE

**Civil Conspiracy
(Against all Crossclaim Defendants and Third-Party Defendants except the SHIP Action Defendants)**

444. With respect to Paragraph “444” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “443” of this Answer.

445. This Count has been dismissed against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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COUNT SIX

**Breach of Contract Guaranty
(Against Mark Nordlicht and Dahlia Kalter)**

454. With respect to Paragraph “454” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “453” of this Answer.

455. This Count is not alleged against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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COUNT SEVEN

Unjust Enrichment

(Against the Co-Conspirator Defendants, the Beechwood Owner Trusts, the BRILLC Series Entities, and the BRILLC Series Members)

461. With respect to Paragraph “461” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “460” of this Answer.

462. This Count has been dismissed against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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COUNT EIGHT

Declaratory Judgment for Contractual Indemnification (Against Beechwood Re, BBIL, and BAM I)

467. With respect to Paragraph “467” of the ATPC, Slota repeats and realleges the admissions and denials set forth in Paragraphs “1” through “466” of this Answer.

468. This Count is not alleged against Slota and no responsive pleading is required. To the extent the allegations in any paragraph or sub-paragraphs thereto set forth in this Count or the ATPC support any other counts against Slota, Slota denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph directed at individuals or entities other than Slota. To the extent the allegations of this paragraph are directed at Slota, such allegations are denied.

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FIRST AFFIRMATIVE DEFENSE

473. The Third-Party Complaint must be dismissed because of lack of subject matter jurisdiction to the extent Counts One and Two of the ATPC alleging aiding and abetting fraud

and aiding and abetting breach of fiduciary duty against Slota arise solely under New York State law.

SECOND AFFIRMATIVE DEFENSE

474. The Third-Party Complaint must be dismissed because it fails to state a claim on which relief can be granted as to Counts One and Two including, without limitation, that insofar as claims for fraud and breach fiduciary duty are not alleged and/or have been dismissed as against Slota, thus no aiding and abetting fraud and/or aiding and abetting breach of fiduciary duty is or can be alleged against Slota.

THIRD AFFIRMATIVE DEFENSE

475. The Third-Party Complaint fails because Third-Party Plaintiff's damages, if any, all of which are denied, were sustained as result of intervening causes not produced by Slota and not as a result of the alleged conduct, acts or omissions of Slota.

FOURTH AFFIRMATIVE DEFENSE

476. The Third-Party Complaint fails because Third-Party Plaintiff's damages, if any, all of which are denied, were sustained as result of the Third-Party Plaintiff's own culpable conduct, and not as a result of the alleged conduct, acts or omissions of Slota including, but not limited to SHIP's own participation in the alleged scheme that is the subject of the ATPC.

FIFTH AFFIRMATIVE DEFENSE

477. The Third-Party Complaint fails pursuant to the doctrine of unclean hands because of the Third-Party Plaintiff's own participation in the alleged scheme that is the subject of the ATPC.

SIXTH AFFIRMATIVE DEFENSE

478. The Third-Party Complaint fails because Third-Party Plaintiff's damages, if any, all of which are denied, were sustained as result of were sustained as a result of conduct, acts or omissions of persons and/or entities other than Slota.

SEVENTH AFFIRMATIVE DEFENSE

479. The Third-Party Complaint fails to accurately state the alleged damages.

EIGHTH AFFIRMATIVE DEFENSE

480. Slota reserve his right(s) to assert any and other defenses as discovery may reveal or may be directed with respect to the ATPC or any amendment thereto.

WHEREFORE Third-Party Defendant Slota respectfully request that the ATPC be dismissed in its entirety as against him, and that fees, costs and disbursements and attorneys' fees be remitted to Slota for defending this action, together with such other and further relief as this Court deems just and proper.

Dated: New York, NY
September 17, 2019

**COX PADMORE SKOLNIK &
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina

Stefan B. Kalina, Esq.

Attorneys for Third-Party Defendant

Will Slota

630 Third Avenue, 19th Floor

New York, NY 10017

Telephone: (212) 953-6633

Facsimile: (212) 949-6943

Email: kalina@cpsslaw.com

UNITED STATES DISTRICT COURT
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,

v.

MARK NORDLICHT, et al.,

Third-Party Defendants.

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., et al.,

Third-Party Defendants.

JURY DEMAND

COUNSELEORS:

PLEASE TAKE NOTICE that Third-Party Defendant Will Slota, by its undersigned attorneys, hereby demands a trial of all issues in the above-captioned action by jury.

Dated: New York, NY
September 17, 2019

**COX PADMORE SKOLNIK &
SHAKARCHY LLP**

By: /s/ Stefan B. Kalina

Stefan B. Kalina, Esq.

Attorneys for Third-Party Defendant
Will Slota

630 Third Avenue, 19th Floor

New York, NY 10017

Telephone: (212) 953-6633

Facsimile: (212) 949-6943

Email: kalina@cpsslaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing THIRD-PARTY DEFENDANT WILL SLOTA'S JURY DEMAND was electronically served on all counsel of record in the above-captioned matter by the EM/ECF system on this 17th day of September, 2019.

Respectfully submitted,

COX PADMORE SKOLNIK SHAKARCHY LLP

By: /s/ Stefan B. Kalina

Steven D. Skolnik, Esq.

Stefan B. Kalina, Esq.

Attorneys for Third Party Defendant

Will Slota

630 Third Avenue, 19th Floor

New York, NY 10017

Tel: (212) 953-6633

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Email: kalina@cpsslaw.com