IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| IN RE PLATINUM-BEECHWOOD LITIGATION | : Case No. 18-cv-6658 (JSR) : |
|--|-------------------------------------|
| MELANIE L. CYGANOWSKI, as Equity Receiver for PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND LP, <i>et al.</i> , | : : Case No. 18-cv-12018 (JSR) |
| Plaintiffs, | : |
| V. | : |
| BEECHWOOD RE LTD., et al., | : |
| Defendants. | : |
| SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, | : |
| Third-Party Plaintiff, | : |
| v. | |
| PB INVESTMENT HOLDINGS LTD., et al., | |
| Third-Party Defendants. | : |

MOTION TO WITHDRAW APPEARANCE

The undersigned, having appeared as counsel on behalf of Third-Party Defendants

Whitestar LLC, Whitestar LLC II, and Whitestar LLC III (the "Whitestar Entities") in the above-

captioned action on July 9, 2019 (ECF No. 330) respectfully requests, due to his imminent

departure from Wiggin & Dana LLP, that the Court enter an order directing the Clerk to relieve

Case 1:18-cv-12018-JSR Document 423 Filed 09/25/19 Page 2 of 4

him as counsel for the Whitestar Entities, remove his appearance from the docket, and remove his name from the ECF distribution list.

The undersigned's departure will not affect any pending deadlines nor occasion any delays in this action, as other attorneys from Wiggin & Dana LLP, including Paul Tuchmann (who has already appeared on behalf of the Whitestar Entities), will continue to represent the Whitestar Entities.

Dated: September 25, 2019 New York, NY

WIGGIN AND DANA LLP

/s/ Brett M. Collings

Brett M. Collings 437 Madison Avenue, 35th Floor New York, New York 10022 Telephone: 212-551-2600 Facsimile: 212-551-2888

Attorneys for Third-Party Defendants Whitestar LLC, Whitestar LLC II, and Whitestar LLC III.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| IN RE PLATINUM-BEECHWOOD LITIGATION | : Case No. 18-cv-6658 (JSR) : |
|--|-------------------------------------|
| MELANIE L. CYGANOWSKI, as Equity Receiver for PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND LP, <i>et al.</i> , | : Case No. 18-cv-12018 (JSR) |
| Plaintiffs, | |
| v. | |
| BEECHWOOD RE LTD., et al., | |
| Defendants. | : |
| SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, | : |
| Third-Party Plaintiff, | · · |
| v. | · · |
| PB INVESTMENT HOLDINGS LTD., et al., | |
| Third-Party Defendants. | • • |

[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW APPEARANCE

Upon consideration of the Motion to Withdraw Appearance of Brett M. Collings as counsel on behalf of Third-Party Defendants Whitestar LLC, Whitestar LLC II, and Whitestar LLC III (the "Whitestar Entities") in the above-captioned action (the "Motion"), it is hereby **ORDERED** that the Motion is **GRANTED**. The Clerk of the Court is directed to relieve Mr. Collings as counsel for the Whitestar Entities, remove his appearance from the docket, and remove his name from the ECF distribution list. Case 1:18-cv-12018-JSR Document 423 Filed 09/25/19 Page 4 of 4

SO ORDERED.

Dated: This _____ day of _____, 2019

Jed S. Rakoff United States District Judge