

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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 FUND INTERNATIONAL (A) LTD., AND PLATINUM PARTNERS CREDIT OPPORTUNITIES FUND (BL) LLC,

Plaintiff,

-and-

BEECHWOOD RE LTD., BEECHWOOD RE INVESTMENTS, LLC, B ASSET MANAGER LP, B ASSET MANAGER II LP, BEECHWOOD RE HOLDINGS, INC., BEECHWOOD BERMUDA INTERNATIONAL, LTD., BEECHWOOD BERMUDA LTD., BAM ADMINISTRATIVE SERVICES LLC, BRE BCLIC 2013 LTC PRIMARY, BRE BCLIC 2013 LTC SUB, BRE WNIC 2013 LTC PRIMARY, BRE WNIC 2013 LTC SUB, MOSHE M. FEUER a/k/a MARK FEUER, FEUER FAMILY TRUST, TAYLOR-LAU FAMILY TRUST, SCOTT A. TAYLOR, SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, FUZION ANALYTICS, INC., BANKERS CONSECO LIFE INSURANCE COMPANY, WASHINGTON NATIONAL INSURANCE COMPANY, CNO FINANCIAL GROUP, INC., 40/86 ADVISORS, INC., and JOHN DOES 1-100

Defendants.

Case No.: 1:18-cv-12018-JSR

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned attorney hereby enters an appearance in this case on behalf of Wilmington Trust, N.A., as trustee for Defendants BRE WNIC 2013 LTC Primary, BRE WNIC 2013 LTC Sub, BRE BCLIC 2013 LTC Primary, and BRE BCLIC 2013 LTC Sub, and requests that copies of all notices given or required to be given and all papers filed, served or required to be served, in this case be given to and served upon the undersigned at the following address, telephone number, facsimile number, and e-mail address::

PARKER IBRAHIM & BERG LLP

Sanjay P. Ibrahim, Esq.
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Dated: January 22, 2019

PARKER IBRAHIM & BERG LLP

Attorneys for Wilmington Trust, N.A., as trustee for Defendants BRE WNIC 2013 LTC Primary, BRE WNIC 2013 LTC Sub, BRE BCLIC 2013 LTC Primary, and BRE BCLIC 2013 LTC Sub



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Plaintiff,

-and-

BEECHWOOD RE LTD., BEECHWOOD RE INVESTMENTS, LLC, B ASSET MANAGER LP, B ASSET MANAGER II LP, BEECHWOOD RE HOLDINGS, INC., BEECHWOOD BERMUDA INTERNATIONAL, LTD., BEECHWOOD BERMUDA LTD., BAM ADMINISTRATIVE SERVICES LLC, BRE BCLIC 2013 LTC PRIMARY, BRE BCLIC 2013 LTC SUB, BRE WNIC 2013 LTC PRIMARY, BRE WNIC 2013 LTC SUB, MOSHE M. FEUER a/k/a MARK FEUER, FEUER FAMILY TRUST, TAYLOR-LAU FAMILY TRUST, SCOTT A. TAYLOR, SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, FUZION ANALYTICS, INC., BANKERS CONSECO LIFE INSURANCE COMPANY, WASHINGTON NATIONAL INSURANCE COMPANY, CNO FINANCIAL GROUP, INC., 40/86 ADVISORS, INC., and JOHN DOES 1-100

Defendants.

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CERTIFICATE OF SERVICE

I, Sanjay P. Ibrahim, hereby certify as follows:

1. I am an attorney-at-law admitted to practice in this Court and a partner of the law firm of Parker Ibrahim & Berg LLP, attorneys for Wilmington Trust, N.A., as trustee for Defendants BRE WNIC 2013 LTC Primary, BRE WNIC 2013 LTC Sub, BRE BCLIC 2013 LTC Primary, and BRE BCLIC 2013 LTC Sub in the above-captioned action.

2. On January 22, 2019, I caused to be served a Notice of Appearance on behalf of the aforementioned defendants and this Certificate of Service upon all counsel of record via ECF.

3. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false I may be subject to punishment.

Dated: January 22, 2019

PARKER IBRAHIM & BERG LLP

Attorneys for Wilmington Trust, N.A., as trustee for Defendants BRE WNIC 2013 LTC Primary, BRE WNIC 2013 LTC Sub, BRE BCLIC 2013 LTC Primary, and BRE BCLIC 2013 LTC Sub



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