

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
IN RE PLATINUM-BEECHWOOD LITIGATION

:
: 18-cv-6658 (JSR)
:

----- X
MELANIE L. CYGANOWSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITIES
MASTER FUND LP, *et al.*,

:
: 18-cv-12018 (JSR)
:

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.
----- X

WASHINGTON NATIONAL INSURANCE COMPANY and
BANKERS CONSECO LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, *et al.*,

Third-Party Defendants.
----- X

**JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL
WITH PREJUDICE PURSUANT TO FED. R. CIV. P. 41(a)(2)**

WHEREAS, on March 27, 2019, Third-Party Plaintiffs Washington National Insurance Company and Bankers Conseco Life Insurance Company (together, "CNO") filed a Third-Party Complaint (ECF No. 75¹) (the "TPC") in the above-captioned *Cyganowski* action against, *inter alia*, Mark Nordlicht, Murray Huberfeld, David Bodner, David Levy, Will Slota,

¹ ECF citations refer to the *Cyganowski* docket, 18-cv-12018 (JSR).

David Ottensoser, Naftali Manela, Beechwood Trusts Nos. 1 – 20, and Beechwood Re Investments, LLC Series A through Series I (collectively the “Settling Defendants” and together with CNO, the “Settling Parties”);

WHEREAS, on August 20, 2019, the Court issued an order (ECF No. 380) dismissing all claims in the TPC against Beechwood Trusts Nos. 7 – 14;

IT IS HEREBY JOINTLY STIPULATED AND AGREED by and between the Settling Parties, by their respective attorneys, as follows:

1. CNO hereby dismisses its TPC as against the Settling Defendants with prejudice; and
2. Each Settling Party is to bear its own attorneys’ fees, costs, and expenses.

Dated: October 7, 2019
New York, New York

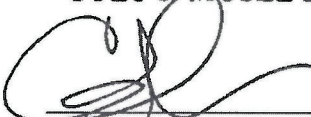
Respectfully submitted,

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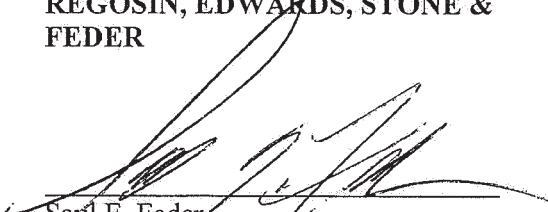


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SO ORDERED:

United States District Judge

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United States District Judge