

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

18-cv-6658 (JSR)

MELANIE L. CYGANWOSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITES
MASTER FUND LP, et al.,

18-cv-12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

WASHINGTON NATIONAL INSURANCE
COMPANY and BANKERS CONSECO LIFE
INSURANCE COMPANY,

Cross-Claim and Third-Party
Plaintiffs,

v.

MARK NORDLICHT, et al.,

Cross-Claim and Third-Party
Defendants.

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

WHEREAS, on March 27, 2019, Washington National Insurance Company and Bankers Consec Life Insurance Company (together, “CNO”) filed Cross-Claims and a Third-Party Complaint (ECF No. 75)¹ (the “TPC”) in the above-captioned *Cyganowski* action against,

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

inter alia, Beechwood Re Ltd., Beechwood Re Holdings, Inc., Beechwood Bermuda Ltd., Beechwood Bermuda International Ltd., B Asset Manager LP, BAM Administrative Services LLC, the Feuer Family Trust, the Taylor-Lau Family Trust, Beechwood Capital Group LLC (“BCG”), Moshe Feuer, Scott Taylor, and Dhruv Narain (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 BCG, Moshe Feuer, and Scott Taylor;

IT IS HERBY 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: November 14, 2019
New York, New York

Respectfully submitted,

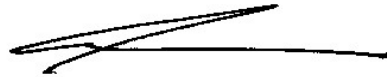
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*and Bankers Consec Life Insurance
Company*

*Beechwood Bermuda International Ltd., B
Asset Manager LP, BAM Administrative
Services LLC, the Feuer Family Trust, the
Taylor-Lau Family Trust, Beechwood
Capital Group LLC, Moshe Feuer, Scott
Taylor, and Dhruv Narain*

SO ORDERED:

United States District Judge