

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.

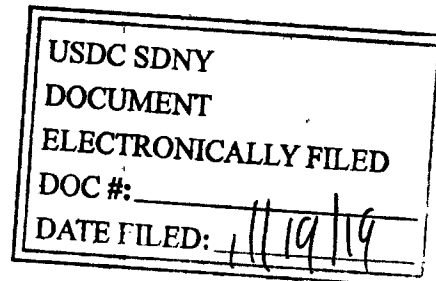
WASHINGTON NATIONAL INSURANCE  
COMPANY and BANKERS CONSECO LIFE  
INSURANCE COMPANY,

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 Conseco Life Insurance Company (together, "CNO") filed Cross-Claims and a Third-Party Complaint (ECF No. 75)<sup>1</sup> (the "TPC") in the above-captioned *Cyganowski* action against,

<sup>1</sup> 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;

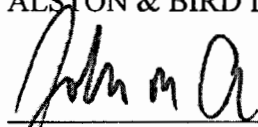
**IT IS HERBY JOINTLY STIPULATED AND AGREED** by and between the Settling Parties, by their respective attorneys, as follows:

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

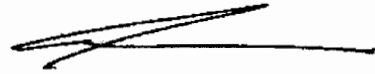
Respectfully submitted,

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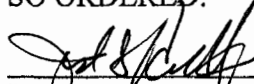
  
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Holdings, Inc., Beechwood Bermuda Ltd.,*

*and Bankers Consecro 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

11-15-19