

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

IN RE PLATINUM-BEECHWOOD
LITIGATION

Master Docket No. 1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

Plaintiff,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

Case No. 1:18-cv-06658 (JSR)

MARTIN TROTT and CHRISTOPHER
SMITH, as Joint Official Liquidators and
Foreign Representatives of PLATINUM
PARTNERS VALUE ARBITRAGE FUND
L.P. (in Official Liquidation) and
PLATINUM PARTNERS VALUE
ARBITRAGE FUND L.P. (in Official
Liquidation),

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC, et
al.,

Defendants.

Case No. 1:18-cv-10936-JSR

MELANIE L. CYGANOWSKI, AS
RECEIVER, BY AND FOR PLATINUM
PARTNERS CREDIT OPPORTUNITIES

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

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,

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA,

Crossclaimant,

v.

BEECHWOOD RE LTD., B ASSET MANAGER LP, B ASSET MANAGER II LP, BEECHWOOD RE HOLDINGS, INC., BEECHWOOD BERMUDA LTD., BEECHWOOD BERMUDA INTERNATIONAL LTD., BEECHWOOD BERMUDA INVESTMENT HOLDINGS, LTD., BAM ADMINISTRATIVE SERVICES LLC, FEUER FAMILY TRUST, and TAYLOR-LAU FAMILY TRUST,

Crossclaim
Defendants.

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD.,
BEECHWOOD CAPITAL GROUP, LLC, B
ASSET MANAGER GP LLC, B ASSET
MANAGER II GP LLC, MSD
ADMINISTRATIVE SERVICES LLC,
PLATINUM MANAGEMENT (NY) LLC, N
MANAGEMENT LLC, MARK
NORDLICHT, MURRAY HUBERFELD,
DAVID BODNER, ESTATE OF URI
LANDESMAN, NAFTALI MANELA,
JOSEPH SANFILIPPO, DANIEL SMALL,
ELLIOT FEIT, DAVID STEINBERG,
EZRA BEREN, DAVID OTTENSOSER,
WILL SLOTA, BERNARD FUCHS a/k/a
BERISH FUCHS, DANIEL SAKS,
HOKYONG KIM a/k/a STEWART KIM,
BEECHWOOD TRUST NO. 1,
BEECHWOOD TRUST NO. 2,
BEECHWOOD TRUST NO. 3,
BEECHWOOD TRUST NO. 4,
BEECHWOOD TRUST NO. 5,
BEECHWOOD TRUST NO. 6,
BEECHWOOD TRUST NO. 7,
BEECHWOOD TRUST NO. 8,
BEECHWOOD TRUST NO. 9,
BEECHWOOD TRUST NO. 10,
BEECHWOOD TRUST NO. 11,
BEECHWOOD TRUST NO. 12,
BEECHWOOD TRUST NO. 13,
BEECHWOOD TRUST NO. 14,
BEECHWOOD TRUST NO. 15,
BEECHWOOD TRUST NO. 16,
BEECHWOOD TRUST NO. 17,
BEECHWOOD TRUST NO. 18,
BEECHWOOD TRUST NO. 19,
BEECHWOOD TRUST NO. 20 a/k/a THE
DAVID I LEVY BEECHWOOD TRUST,

BEECHWOOD ASSET MANAGEMENT TRUST I, BEECHWOOD ASSET MANAGEMENT TRUST II, BEECHWOOD RE INVESTMENTS, LLC SERIES A, BEECHWOOD RE INVESTMENTS, LLC SERIES B, BEECHWOOD RE INVESTMENTS, LLC SERIES C, BEECHWOOD RE INVESTMENTS, LLC SERIES D, BEECHWOOD RE INVESTMENTS, LLC SERIES E, BEECHWOOD RE INVESTMENTS, LLC SERIES F, BEECHWOOD RE INVESTMENTS, LLC SERIES G, BEECHWOOD RE INVESTMENTS, LLC SERIES H, BEECHWOOD RE INVESTMENTS, LLC SERIES I, ROAD HOLDINGS, LLC, LAWRENCE PARTNERS, LLC, MONSEY EQUITIES, LLC, WHITESTAR LLC, WHITESTAR LLC II, WHITESTAR LLC III, PLATINUM CREDIT HOLDINGS, LLC, MARK NORDLICHT GRANTOR TRUST, DAHLIA KALTER, MICHAEL JOSEPH NORDLICHT, KEVIN CASSIDY, MARK FEUER AND SAMUEL ADLER AS TRUSTEES FOR BEECHWOOD GLOBAL DISTRIBUTION TRUST, BRAD SHALIT AS TRUSTEE FOR FEUER FAMILY 2016 ACQ TRUST, and BRAD SHALIT AS TRUSTEE FOR TAYLOR-LAU FAMILY 2016 ACQ TRUST,

Third-Party
Defendants.

NOTICE OF EZRA BEREN'S MOTION TO DISMISS

PROVENZANO GRANNE & BADER LLP
1330 Avenue of the Americas, Suite 23A
New York, NY 10019

PLEASE TAKE NOTICE that upon the accompanying *Memorandum of Law In Support of Ezra Beren's Motion to Dismiss*, Defendant Ezra Beren, by and through his counsel, will move this Court pursuant to Fed. R. Civ. P. 12(b)(6) at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007-1312, on such date and at such time as the Court may direct, for an order granting Defendant's Motion to Dismiss, and for such other and further relief as this Court may deem just and proper.

Dated: December 2, 2019
New York, NY

/s/ S. Christopher Provenzano
S. Christopher Provenzano
PROVENZANO GRANNE & BADER LLP
Counsel for Defendant Ezra Beren

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