

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM BEECHWOOD  
LITIGATION

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

MARTIN TROTT *et al.*,

plaintiffs

*against*

PLATINUM MANAGEMENT (NY)  
LLC, *et al.*,

defendants

No. 1:18-cv-10936-JSR

**DEFENDANT EZRA BEREN'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33 and Local Civil Rule 33.3, defendant Ezra Beren propounds this first set of interrogatories upon the plaintiffs in the above-captioned action.

**Instructions and Definitions**

These interrogatories adopt the uniform definitions as required by Local Civil Rule 26.3. To the extent that other defined terms are used, they have the same meaning as used in the Second Amended Complaint in this action.

### Interrogatories

With respect to each topic below, identify (1) witnesses with knowledge or information relevant to the subject matter and (2) whether there exist relevant documents and, if so, the custodian, location and general description of such documents:

1. Mr. Beren's role, duties, reporting responsibilities, compensation or terms of employment at Platinum Management, PPVA, RJ Credit, BAM or any of the Beechwood Entities.
2. Mr. Beren's "management role with Platinum Management and Beechwood."
3. Mr. Beren's membership on or participation with any "valuation committee."
4. Any bonuses or other compensation allegedly paid to Mr. Beren in respect of the performance of Platinum Management, PPVA, RJ Credit, BAM or any of the Beechwood Entities or any of their investments.
5. Mr. Beren's knowledge of the First Scheme or any of the entities involved therein or their valuation.
6. Mr. Beren's knowledge of Golden Gate or its valuation.
7. Mr. Beren's knowledge of PEDEVCO or its valuation.
8. Mr. Beren's knowledge of IMSC or its valuation.

9. Mr. Beren's knowledge or valuation of the Montsant Collateral Account.
10. Mr. Beren's knowledge of the Nordlicht Side Letter.
11. Mr. Beren's knowledge of the Northstar debt.
12. Mr. Beren's knowledge of Black Elk or the Black Elk Scheme, including the valuation of Black Elk.
13. Mr. Beren's knowledge of Agera Energy or its valuation or sale.
14. Mr. Beren's knowledge of Starfish or its valuation or sale.
15. Mr. Beren's knowledge or valuation of the PGS Assignment.
16. Mr. Beren's knowledge of the Security Lockup.
17. Mr. Beren's knowledge of the PPNE Notes.
18. Mr. Beren's knowledge of Twosons, the repurchase of its series E equity, or the Twosons Note.
19. Mr. Beren's knowledge or valuation Epocs or West Loop.
20. Mr. Beren's knowledge of the Spectrum30 Loan.

21. State the portion of damages for which you believe Mr. Beren is responsible with respect to each claim and your computation thereof, or if you believe him to be jointly and severally liable on all claims so state.

Dated: November 19, 2019  
New York, NY



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S. Christopher Provenzano  
Michael A. Granne

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