

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

IN RE PLATINUM-BEECHWOOD LITIGATION

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

MELANIE L. CYGANOWSKI, AS EQUITY
RECEIVER FOR PLATINUM PARTNERS
CREDIT OPPORTUNITIES MASTER FUND, et
al.,

Plaintiff,

v.
BEECHWOOD RE LTD., et al.,

Defendants.

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

NOTICE OF MOTION

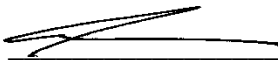
PLEASE TAKE NOTICE that, upon the accompanying memorandum of law in support, Beechwood Bermuda International, Ltd. (“BBIL”), Beechwood Bermuda, Ltd. (“BBL”) and BAM Administrative Services LLC (“BAM Admin”) (collectively, the “Beechwood Entities”) will move this Court, before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, pursuant to Federal Rule of Civil Procedure 56, for an order granting summary judgment in favor of the Beechwood Entities regarding all remaining claims asserted by the plaintiffs, and for such other and further relief as may be just and equitable.

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Dated: Kew Gardens, New York
February 14, 2020

LIPSIUS-BENHAIM LAW LLP

*Attorneys for Defendants Beechwood Bermuda
International, Ltd., Beechwood Bermuda, Ltd. and
BAM Administrative Services LLC*

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