

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.

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

BEECHWOOD RE LTD., et al.,

Defendants.

**SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA'S**  
**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the First Amended Complaint, dated March 29, 2019; the accompanying Memorandum of Law in Support of Senior Health Insurance Company of Pennsylvania's Motion for Summary Judgment, dated February 14, 2020; the Declaration of Aidan M. McCormack, dated February 14, 2020, and exhibits thereto; the Local Rule 56.1 Statement of Material Facts in Support of Senior Health Insurance Company of Pennsylvania's Motion for Summary Judgment, dated February 14, 2020; and all prior pleadings, submissions, and proceedings had herein, Defendant Senior Health Insurance Company of Pennsylvania, by and through its undersigned counsel, will move this Court, before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on March 20, 2020, at 3:30 p.m., for an order (i) granting its motion, pursuant to Federal

Rule of Civil Procedure 56 and Local Civil Rule 56.1, for summary judgment in its favor and (ii) for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's January 2, 2020 Order, any opposition to the motion must be served on the undersigned on or before March 6, 2020. Reply papers, if any, must be served on or before March 13, 2020.

Dated: February 14, 2020  
New York, New York

Respectfully Submitted,  
  
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