

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION :  
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18-cv-6658 (JSR)

MELANIE L. CYGANOWSKI, as Equity Receiver for  
PLATINUM PARTNERS CREDIT OPPORTUNITIES  
MASTER FUND LP, *et al.*,

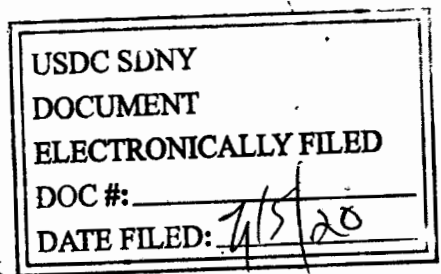
18-cv-12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.



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:  
WASHINGTON NATIONAL INSURANCE COMPANY and  
BANKERS CONSECO LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, *et al.*,

Third-Party Defendants.

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**JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL  
WITH PREJUDICE PURSUANT TO FED. R. CIV. P. 41(a)(2)**

**WHEREAS**, on September 4, 2019, Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania (“SHIP”) filed the First Amended Third-Party Complaint (ECF No. 382<sup>1</sup>) (the “FATPC”) in the above-captioned *Cyganowski* action against, *inter alia*, David Bodner, Mark Nordlicht, Dahlia Kalter, Murray Huberfeld, Ezra Beren, Will Slota, David Ottensoser, Naftali Manela, Joseph San Filippo, Estate of Uri Landesman, Platinum Management (NY) LLC, Whitestar LLC; Whitestar LLC II; Whitestar LLC III; Monsey Equities, LLC; Lawrence Partners, LLC, Beechwood Trust Nos. 1-19; Beechwood Re Investments, LLC Series A-I; Road Holdings LLC; and the Mark Nordlicht Grantor Trust (collectively the “Settling Defendants” and together with SHIP, the “Settling Parties”);

**WHEREAS**, the Settling Parties have reached a consensual resolution of the claims asserted in the FATPC under the terms and conditions set forth in their agreement;

**WHEREAS**, the Settling Defendants have authorized the undersigned counsel for certain Settling Defendants to execute and file this Stipulation and Proposed Order of Dismissal on behalf of all Settling Defendants;

**IT IS HEREBY JOINTLY STIPULATED AND AGREED** by and between the Settling Parties:

1. SHIP hereby dismisses its FATPC as against the Settling Defendants with prejudice; and

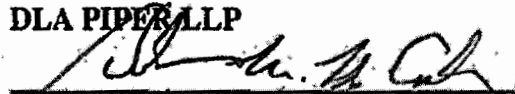
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<sup>1</sup> ECF citations refer to the *Cyganowski* docket, 18-cv-12018 (JSR).

2. Each Settling Party is to bear its own attorneys' fees, costs, and expenses.


Dated: March 2, 2020  
New York, New York

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Bodner; Monsey Equities, LLC; Beechwood  
Trusts Nos. 7-14; Beechwood Re Investments,  
LLC Series C; and Dahlia Kalter; and Authorized  
Signatory for the Settling Defendants*

SO ORDERED:

  
United States District Judge

3-4-20

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