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

No. 1:18-cv-10936-JSR

PLATINUM MANAGEMENT (NY) LLC, et al.,

defendants.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Ezra Beren's Motion for Summary Judgment, Affirmation of Ezra David Beren, Affirmation of Mark Nordlicht, Affirmation of Joseph SanFilippo, and Local Rule 56.1 Statement in Support of Ezra Beren's Motion for Summary Judgment, Defendant Ezra Beren, by and through his counsel, will move this Court pursuant to Fed. R. Civ. P. 56 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 entering judgment in favor of defendant Ezra Beren, and for such other and further relief as this Court may deem just and proper.

Dated: February 14, 2020

Respectfully submitted,

S. Christopher Provenzano

PROVENZANO GRANNE & BADER LLP

Attorneys for Defendant Ezra Beren 1330 Avenue of the Americas, Suite 23A New York, NY 10019

Telephone: (212) 653-0388 chris.provenzano@pgbfirm.com