

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

Civil Action No.
1:18-cv-00658

MELANIE L. CYGANOWSKI, AS RECEIVER,
BY AND FOR PLATINUM PARTNERS CREDIT
OPPORTUNITIES MASTER FUND LP,
PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
LLC, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND INTERNATIONAL
LTD., PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND INTERNATIONAL (A)
LTD., and PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (BL) LLC,

Civil Action No.
1:18-cv-12018

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

**NOTICE OF DEFENDANT PB INVESTMENT HOLDINGS LTD.'S
MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE THAT Defendant, PB Investment Holdings, Ltd, as successor-in-interest to Beechwood Bermuda Investment Holdings, Ltd. (“PBIHL”), by its undersigned attorneys, will move this Court before the Honorable Jed s. Rakoff, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, for an order pursuant to Federal Rule of Civil Procedure 56(a) granting summary judgment to PBIHL on all of Plaintiff’s claims, on the grounds that there exists no genuine issue as to any material fact in this case, and that PBIHL is entitled to judgment as a matter of law.

PLEASE TAKE FUTURE NOTICE, that in accordance with the Court's January 2, 2020, Order, PBIHL will serve and file its Memorandum of Law, Local Rule 56.1 Statement, and such other papers in support of its Motion on or before February 14, 2020.

PLEASE TAKE FURTHER NOTICE, that in accordance with the Court's January 2, 2020, Order, Plaintiff is required to serve and file opposition papers on or before March 6, 2020; PBIHL shall serve and file any reply papers on or before March 13, 2020; and oral argument shall be held on March 20, 2020.

Dated: February 14, 2020

Respectfully submitted,

CONDON TOBIN SLADEK THORNTON, PLLC

/s/ Kendal B. Reed

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