

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

IN RE PLATINUM-BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

No. 1:18-cv-06658-JSR

v.

BEECHWOOD RE LTD. et al.,

Defendants.

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

No. 1:18-cv-12018-JSR

Plaintiff,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

MOTION TO WITHDRAW APPEARANCE

Senior Health Insurance Company of Pennsylvania (“SHIP”) respectfully requests that that the Court enter an order directing the Clerk to relieve Kathleen Birrane as counsel for SHIP, due to her departure from DLA Piper LLP, remove her appearances from the dockets in the consolidated actions, and remove her name from the ECF distribution lists. Ms. Birrane has appeared as counsel for SHIP (*i*) in the portion of the consolidated action captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd. et al.* No. 1:18-cv-06658-JSR

(S.D.N.Y.) on August 1, 2018 (ECF No. 24); and (ii) in the portion of the consolidated action captioned *Cyganowski, et al. v. Beechwood Re Ltd., et al.*, No. 1:18-cv-12018-JSR (S.D.N.Y.) on March 28, 2019 (ECF No. 80).

Ms. Birrane's departure will not affect any pending deadlines nor occasion any delays in this consolidated action, as other attorneys from DLA Piper have also appeared and continue to represent SHIP's interests in *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR, (S.D.N.Y) and *Cyganowski, et al. v. Beechwood Re Ltd., et al.*, No. 1:18-cv-12018-JSR (S.D.N.Y.).

Dated: May 21, 2020

Respectfully submitted,

/s/ Aidan M. McCormack
DLA Piper LLP (US)

Aidan M. McCormack (AMM 3017)
R. Brian Seibert (RS 1978)
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020
(212) 335-4500

James D. Mathias (admitted *pro hac vice*)
Ellen E. Dew (admitted *pro hac vice*)
DLA Piper LLP (US)
The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600
(410) 580-3000

*Counsel for Senior Health Insurance
Company of Pennsylvania*

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2020, I electronically filed the foregoing with the Clerk of the Court for the Southern District of New York, using the CM/ECF system, which will provide notification of such filing to the parties of record.

/s/ Aidan M. McCormack

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BEECHWOOD RE LTD., et al.,

Defendants.

[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW APPEARANCE

Upon consideration of the Motion to Withdraw the Appearance of Kathleen Birrane as counsel for Senior Health Insurance Company of Pennsylvania (“SHIP”) in the above-captioned actions (the “Motion”), it is hereby ORDERED that the Motion is GRANTED. The Clerk of the Court is directed to relieve Ms. Birrane as counsel for SHIP, remove her appearances from the dockets in the consolidated actions, and remove her name from the ECF distribution lists.

SO ORDERED.

Dated: This ____ day of _____, 2020.

Jed S. Rakoff
United States District Judge
