UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION,

Civil Action No. 1:18-cv-06658 (JSR)

SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA,

Civil Action No. 1:18-cv-12018 (JSR)

Cross-claimant,

v.

BEECHWOOD RE LTD., BEECHWOOD RE INVESTMENTS, LLC, B ASSET MANAGER LP, B ASSET MANAGER II LP, BEECHWOOD RE HOLDINGS, INC., BEECHWOOD BERMUDA LTD., BEECHWOOD BERMUDA INTERNATIONAL LTD., BAM ADMINISTRATIVE SERVICES LLC, FEUER FAMILY TRUST, TAYLOR-LAU FAMILY TRUST,

Cross-claim Defendants.

SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., et al.,

Civil Action No. 1:18-cv-12018 (JSR)

Third-Party Defendants.

STIPULATION AND ORDER OF VOLUNTARY DISMISSAL

IT IS HEREBY STIPULATED AND AGREED, pursuant to Rule 41(a)(1)(B) of the

Federal Rules of Civil Procedure, by and between the undersigned counsel for (a) Cross-Claim

and Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania, in Rehabilitation ("SHIP"), (b) Cross-claim Defendants Beechwood Re (in Official Liquidation), B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda Ltd., Beechwood Bermuda Ltd., Beechwood Bermuda International Ltd., BAM Administrative Services, LLC, the Feuer Family Trust, and the Taylor-Lau Family Trust (the "Beechwood Cross-Claim Parties"), and (c) Third-Party Defendants Beechwood Capital Group, LLC, B Asset Manager GP LLC, B Asset Manager II GP LLC, MSD Administrative Services, LLC, N Management LLC, Beechwood Global Distribution Trust, the Feuer Family 2016 ACQ Trust, and the Taylor-Lau Family 2016 ACQ Trust (the "Beechwood Third-Party Defendants") that all claims asserted by SHIP against the Beechwood Cross-Claim Parties and all claims asserted by SHIP against the Beechwood Third-Party Defendants in this action are voluntarily dismissed with prejudice and without costs or attorneys' fees against any party.

Dated: New York, New York July 20, 2020

LIPSIUS-BEHHAIM LAW LLP

By: _____ Ira S. Lipsius

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and Third-Party Plaintiff Senior Health Insurance Company of Pennsylvania, in Rehabilitation
("SHIP"), (b) Cross-claim Defendants Beechwood Re (in Official Liquidation), B Asset
Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda Ltd.,
Beechwood Bermuda International Ltd., BAM Administrative Services, LLC, the Feuer Family
Trust, and the Taylor-Lau Family Trust (the "Beechwood Cross-Claim Parties"), and (c) ThirdParty Defendants Beechwood Capital Group, LLC, B Asset Manager GP LLC, B Asset Manager
II GP LLC, MSD Administrative Services, LLC, N Management LLC, Beechwood Global
Distribution Trust, the Feuer Family 2016 ACQ Trust, and the Taylor-Lau Family 2016 ACQ
Trust (the "Beechwood Third-Party Defendants") that all claims asserted by SHIP against the
Beechwood Cross-Claim Parties and all claims asserted by SHIP against the Beechwood ThirdParty Defendants in this action are voluntarily dismissed with prejudice and without costs or
attorneys' fees against any party.

Dated: New York, New York July 20, 2020

LIPSIUS-BEHHAIM LAW LLP

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Parties), Beechwood Re (In Official
Liquidation), B Asset Manager LP, B Asset
Manager II LP, Beechwood Re Holdings,
Inc., Beechwood Bermuda Ltd., Beechwood
Bermuda International Ltd., Beechwood
Bermuda Investment Holdings, LTD. BAM
Administrative Services, LLC, the Feuer

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Email: aidan.mccormack@dlapiper.com brian.seibert@dlapiper.com Family Trust, and the Taylor-Lau Family Trust

and for

Beechwood Third-Party Defendants
Beechwood Capital Group, LLC, B Asset
Manager GP LLC, B Asset Manager II GP
LLC, MSD Administrative Services, LLC, N
Management LLC, Beechwood Global
Distribution Trust, the Feuer Family 2016
ACQ Trust, and the Taylor-Lau Family 2016
ACQ Trust

SO ORDERED:

Hon. Jed S. Rakoff, U.S.D.J.

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