EXHIBIT I

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

-----X

SECURITIES AND EXCHANGE

COMMISSION,

Plaintiff,

-V-

:

No. 16-cv-6848 (BMC)

PLATINUM CREDIT MANAGEMENT, L.P.; :

PLATINUM MANAGEMENT (NY) LLC;

MARK NORDLICHT;

DAVID LEVY; DANIEL SMALL;

URI LANDESMAN; JOSEPH MANN;

JOSEPH SANFILIPPO; and

JEFFREY SHULSE,

Defendants.

_____X

[PROPOSED] ORDER GRANTING THE RECEIVER'S MOTION FOR ENTRY OF AN ORDER (A) APPROVING SETTLEMENT AGREEMENTS WITH (1) CNO FINANCIAL GROUP, INC. AND RELATED PARTIES, AND (2) SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA AND FUZION ANALYTICS, INC., AND (B) APPROVING USE OF FUNDS

On July 1, 2020, Melanie L. Cyganowski, as the duly appointed Receiver (the "Receiver") of Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP ("PPCO"), Platinum Partners Credit Opportunities Fund (TE) LLC ("TE Feeder"), Platinum Partners Credit Opportunities Fund LLC ("US Feeder"), Platinum Partners Credit Opportunities Fund (BL) LLC ("Blocker"), Platinum Partners Credit Opportunities Fund International Ltd. ("Int'l Feeder"), Platinum Partners Credit Opportunities Fund International (A) Ltd. ("Int'l (A) Feeder"), Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., and Platinum Partners Liquid Opportunity Master Fund L.P. (collectively, the "Receivership Entities"), previously filed a motion (Docket No. 535) (the "Motion") for entry of an Order:

- approving a settlement agreement (the "CNO Settlement Agreement"), a copy of which is attached as Exhibit A to the Declaration of Melanie L. Cyganowski, as Receiver (the "Receiver Decl."), dated as of July 1, 2020, between (1) the Receiver and the PPCO Receivership Entities, on one hand, and (2) CNO Financial Group, Inc., Bankers Conseco Life Insurance Company, Washington National Insurance Company, 40|86 Advisors, Inc., and BRe WNIC 2013 LTC Primary, BRe WNIC 2013 LTC Sub, BRe BCLIC Primary and BRe BCLIC Sub, as represented by Wilmington Trust, in its capacity as their former custodian (collectively, the "CNO Parties"), on the other hand;
- approving a settlement agreement (the "SHIP Settlement Agreement," together with the CNO Settlement Agreement, collectively, the "Settlement Agreements"), a copy of which is attached to the Receiver Decl. as **Exhibit B**, dated as of July 1, 2020. between (1) the Receiver, on behalf of the Receivership Entities and Subsidiaries, on one hand, and (2) Senior Health Insurance Company of Pennsylvania ("SHIP") and Fuzion Analytics, Inc. (collectively the "SHIP Parties"), on the other hand;
- authorizing the Receiver to pay \$14 million payable to SHIP in accordance with the terms of the SHIP Settlement Agreement (the "Settlement Amount");
- authorizing the Receiver to use up to \$1.8 million (approximately 11.8% of the Settlement Amount) of funds from PPCO's subsidiaries ALS Capital Ventures, LLC ("ALS") and/or ALS Life Holdings LLC ("ALS Life"), including funds in ALS' operating account (the "ALS Operating Account") to fund the Settlement Amount, and to use funds of PPCO to fund the remainder of the Settlement Amount; and
- granting such other and further relief as the Court deems just.

In support of the Motion, the Receiver has filed a Notice of Motion, a Memorandum of Law and a Declaration of Melanie L. Cyganowski, as Receiver.

The Court has concluded that (a) approval of the Settlement Agreements is in the best interest of the Receiver, the Receivership Entities, and their estates and stakeholders, as well as the subsidiaries of PPCO; (b) payment of the Settlement Amount as requested to in the Motion is consistent with the Receiver's authority under the *Second Amended Order Appointing Receiver* entered on October 16, 2017 [Dkt. No. 276] (the "*Receivership Order*") and the operating agreements of ALS and ALS Life and appropriate; (c) the Court has jurisdiction to consider the relief requested in the Motion pursuant to, *inter alia*, the Receivership Order; and (d) notice of the Motion has been adequate and appropriate under the circumstances.

Now, after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

- 1. The relief requested in the Motion is **GRANTED** as provided herein.
- 2. All objections to the relief provided for herein that have not been withdrawn, waived or settled, and all reservations of rights included therein, are hereby overruled and denied on the merits.
- 3. The Settlement Agreements are hereby approved and the Receiver is authorized to execute and deliver all instruments and documents and take such other action as may be necessary or appropriate to implement and effectuate the transactions contemplated by the Settlement Agreement.
- 4. The Receiver is hereby authorized to use up to \$1.8 million (approximately 11.8% of the Settlement Amount) of funds from PPCO's subsidiaries ALS and/or ALS Life, including

funds in the ALS Operating Account to fund the Settlement Amount, and to use funds of PPCO to

fund the remainder of the Settlement Amount.

5. The terms of this Order shall be binding upon the Receiver, the CNO Parties, the

SHIP Parties, the subsidiaries of PPCO, ALS, ALS Life, Credit Strategies, LLC and its members,

Principal Growth Strategies LLC and its members, OMNIA Ltd., PBLA ULICO 2017, and BBIL

ULICO 2014, and any other person receiving actual notice of the Motion, any holder of a claim

against the Receivership Entities, and any affiliates, successors, assigns of any of the foregoing.

6. This Order shall be effective and enforceable immediately upon entry.

7. This Court retains jurisdiction with respect to all matters arising from or related to

the Settlement Agreements and the implementation of this Order.

Dated: July 17
Brooklyn, New York

THE HON. BRIAN M. COGAN UNITED STATES DISTRICT JUDGE EASTERN DISTRICT OF NEW YORK