

**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,

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

v.

PB INVESTMENT HOLDINGS LTD., et al.,

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 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

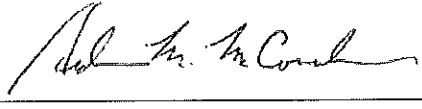
LIPSIUS-BEHHAIM LAW LLP

DLA PIPER LLP (US)

By: \_\_\_\_\_  
Ira S. Lipsius

80-02 Kew Garden Road, Suite 1030  
Kew Gardens, New York 11415  
Telephone: (212) 981-8440  
Email: iral@lipsiuslaw.com

*Attorneys for Beechwood Cross-Claim 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*

By:   
Aidan M. McCormack (AMM 3017)  
R. Brian Seibert (RS 1978)

1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 335-4500  
Facsimile: (212) 335-4501  
Email: [aidan.mccormack@dlapiper.com](mailto:aidan.mccormack@dlapiper.com)  
[brian.seibert@dlapiper.com](mailto:brian.seibert@dlapiper.com)

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) 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.

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LIPSIOUS-BEHHAIM LAW LLP

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Ira S. Lipsius

80-02 Kew Garden Road, Suite 1030  
Kew Gardens, New York 11415  
Telephone: (212) 981-8440  
Email: [iral@lipsiuslaw.com](mailto:iral@lipsiuslaw.com)

*Attorneys for Beechwood Cross-Claim 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*

By: \_\_\_\_\_

Aidan M. McCormack (AMM 3017)  
R. Brian Seibert (RS 1978)

1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 335-4500  
Facsimile: (212) 335-4501  
Email: [aidan.mccormack@dlapiper.com](mailto:aidan.mccormack@dlapiper.com)  
[brian.seibert@dlapiper.com](mailto: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*

James D. Mathias (admitted *pro hac vice*)  
Ellen E. Dew (admitted *pro hac vice*)  
The Marbury Building  
6225 Smith Avenue  
Baltimore, Maryland 21209-3600  
(410) 580-3000  
[james.mathias@dlapiper.com](mailto:james.mathias@dlapiper.com)  
[ellen.dew@dlapiper.com](mailto:ellen.dew@dlapiper.com)

*Attorneys for Defendant  
Senior Health Insurance Company of  
Pennsylvania, in Rehabilitation*

SO ORDERED:

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

7-28-20