

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

IN RE PLATINUM-BEECHWOOD LITIGATION,	X	
	:	Civil Action No.
	:	1:18-cv-06658
	:	
	:	
MELANIE L. CYGANOWSKI, AS RECEIVER FOR	X	
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	:	Civil Action No.
PLATINUM PARTNERS CREDIT OPPORTUNITIES FUND	:	1:18-cv-12018
(BL) LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
BEECHWOOD RE LTD., et al.,	:	
	:	
	:	
Defendants.	X	

JOINT STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE

Plaintiff Melanie L. Cyganowski, in her capacity as the court appointed 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, and defendants 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 (the “Accounts”), represented here by

Wilmington Trust, N.A. in its capacity as former custodian of the Accounts, by their respective undersigned attorneys, hereby jointly stipulate that the above-captioned action is dismissed with prejudice solely as to defendants CNO Financial Group, Inc., Bankers Conesco 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, represented here by Wilmington Trust, N.A., in its capacity as former custodian of the Accounts, and that each party shall bear her or its own attorney's fees, costs and disbursements.

Dated: New York, New York
July 21, 2020

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*Attorneys for Wilmington Trust, N.A.
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BRE BCLIC Primary, BRE BCLIC Sub,
BRE WNIC 2013 LTC Primary
and BRE WNIC 2013 LTC Sub*

Dated: August __, 2020

SO ORDERED:

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