

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

IN RE PLATINUM-BEECHWOOD LITIGATION,	X	
	:	Case No. 1:18-cv-06658 (JSR)
	:	
	:	
MELANIE L. CYGANOWSKI, AS RECEIVER 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,	X	
	:	Case No. 1:18-cv-12018 (JSR)
	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
BEECHWOOD RE LTD., <i>et al.</i> ,	:	
	:	
	:	
Defendants.	X	

**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 plaintiff Melanie L. Cyganowski, as receiver 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 (the “Receiver”), and defendant Senior Health Insurance Company of Pennsylvania, in Rehabilitation (“SHIP”), that all claims asserted by the Receiver against SHIP

in this action are voluntarily dismissed with prejudice and without costs or attorneys' fees against any party.

Dated: New York, New York  
August 4, 2020

OTTERBOURG P.C.

By: Andrew S. Halpern  
Andrew S. Halpern

230 Park Avenue  
New York, New York 10169  
Telephone: (212) 661-9100  
Email: [ahalpern@otterbourg.com](mailto:ahalpern@otterbourg.com)

*Attorneys for Plaintiff Melanie L. Cyganowski,  
as Receiver 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*

DLA PIPER LLP (US)

By: Aidan M. McCormack  
Aidan M. McCormack

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)

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

SO ORDERED:

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