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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION, :

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,

Case No. 1:18-cv-12018 (JSR)

Plaintiff,

v.

BEECHWOOD RE LTD., et al.,

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 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 (BL) LLC (the "Receiver"), and defendants Moshe M. Feuer a/k/a Mark Feuer, Scott A. Taylor, Beechwood Bermuda International Ltd., Beechwood Bermuda Ltd., B Asset Manager

LP, B Asset Manager II, LP, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BAM Administrative Services LLC ("BAM Admin"), and Beechwood Re (In Official Liquidation) (collectively, "Beechwood Parties"), that all claims asserted by the Receiver against Beechwood Parties in this action are voluntarily dismissed without costs or attorneys' fees against any party at any time. The Receiver's claims against all Beechwood Parties except against BAM Admin are dismissed with prejudice. The Receiver's claims against BAM Admin are dismissed without prejudice. BAM Admin waives all costs and/or attorneys' fees pursuant to Fed. R. Civ. P. 41(d) if any claims in this action are refiled.

Dated: New York, New York July 21, 2020

OTTERBOURG P.C.

By: Erik B. Weinick

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Dated: New York, New York July ___, 2020 LIPSIUS-BENHAIM LAW LLP

By: ______
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Attorneys for Defendants Moshe M. Feuer a/k/a Mark Feuer, Scott A. Taylor, Beechwood Bermuda International Ltd., Beechwood Bermuda Ltd., B Asset Manager LP, B Asset Manager II, LP, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BAM Administrative Services LLC and Beechwood Re (In Official Liquidation)

| SO ORDERED | | |
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Hon. Jed S. Rakoff, U.S.D.J.

LP, B Asset Manager II, LP, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BAM Administrative Services LLC ("BAM Admin"), and Beechwood Re (In Official Liquidation) (collectively, "Beechwood Parties"), that all claims asserted by the Receiver against Beechwood Parties in this action are voluntarily dismissed without costs or attorneys' fees against any party at any time. The Receiver's claims against all Beechwood Parties except against BAM Admin are dismissed with prejudice. The Receiver's claims against BAM Admin are dismissed without prejudice. BAM Admin waives all costs and/or attorneys' fees pursuant to Fed. R. Civ. P. 41(d) if any claims in this action are refiled.

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Dated: New York, New York July , 2020 LIPSIUS-BENHAIM LAW LLP

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Bermuda International Ltd., Beechwood Bermuda
Ltd., B Asset Manager LP, B Asset Manager II,
LP, Beechwood Re Investments, LLC, Beechwood
Re Holdings, Inc., BAM Administrative Services
LLC and Beechwood Re (In Official Liquidation)

SO ORDERED

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