

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

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

PLATINUM MANAGEMENT (NY) LLC; :

PLATINUM CREDIT MANAGEMENT, L.P.; :

MARK NORDLICHT; :

DAVID LEVY; :

DANIEL SMALL; :

URI LANDESMAN; :

JOSEPH MANN; :

JOSEPH SANFILIPPO; and :

JEFFREY SHULSE, :

Defendants. :

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No. 16-CV-6848 (BMC)

**NOTICE OF MOTION OF MELANIE L. CYGANOWSKI, AS RECEIVER,
FOR ENTRY OF AN ORDER TO ESTABLISH CLAIMS AND
INTERESTS RECONCILIATION AND VERIFICATION PROCEDURES**

PLEASE TAKE NOTICE that upon the accompanying (1) Declaration of Melanie L. Cyganowski, as Receiver (the “*Receiver*”) for Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunity Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd. and Platinum Partners Credit Opportunities Fund International (A) Ltd. (collectively, the “*Receivership Entities*”), in Support of her Motion for Entry of an Order to Establish Claims and Interests Reconciliation and Verification Procedures (the “*Motion*”), and (2) the Memorandum of Law in Support of the Motion, the Receiver will move before the Honorable Brian M. Cogan, United States District Judge for the United States

District Court for the Eastern District of New York (the “*District Court*”), located at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an Order granting the Motion.

PLEASE TAKE FURTHER NOTICE that any opposition to the Motion must be (i) made in writing; (ii) if by a party named in the above-captioned case, electronically filed with the District Court; or (iii) if by a non-party, electronically mailed to the Receiver at her email address, platinumreceiver@otterbourg.com, so as to be actually received no later than **November 30, 2020**.

PLEASE TAKE FURTHER NOTICE that in the absence of any timely filed or served written opposition, the District Court may grant the relief requested in the Motion without further hearing or notice.

Dated: New York, New York
November 13, 2020

OTTERBOURG P.C.

By: /s/ Adam C. Silverstein
Adam C. Silverstein
Erik. B. Weinick
Jennifer S. Feeney
Michael A. Pantzer
230 Park Avenue
New York, New York 10169
Tel.: (212) 661-9100
Fax: (212) 682-6104
asilverstein@otterbourg.com
eweinick@otterbourg.com
jfeeney@otterbourg.com
mpantzer@otterbourg.com
*Attorneys for Melanie L. Cyganowski,
as Receiver*