

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

MARTIN TROTT and CHRISTOPER SMITH, as  
Joint Official Liquidators and Foreign Representatives  
of PLATINUM PARTNERS VALUE ARBITRAGE  
FUND L.P. (in Official Liquidation) and  
PLATINUM PARTNERS VALUE ARBITRAGE  
FUND L.P. (in Official Liquidation),

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC,  
et al.,  
Defendants.

Master Docket No. 18-cv-06658-JSR

Case No. 1:18-cv-10936-JSR

PROPOSED STIPULATION  
AND ORDER TO WITHDRAW

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys of record for the respective parties to the above-entitled action, that whereas no party hereto is an infant or incompetent person for whom a committee has been appointed and no person not a party has an interest in the subject matter of the action, the motion for summary judgment filed by Seth Gerszberg on February 14, 2020 (Dkt # 535, 578)) is hereby withdrawn without prejudice, without costs to any party as against the other;

**IT IS FURTHER STIPULATED AND AGREED**, that a copy of this stipulation bearing signatures transmitted via facsimile or electronic mail and/or signed in counterpart should be considered by the Court as original signatures.

Dated : New York, New York  
April 6, 2020

EPSTEIN OSTROVE, LLC

s/ ELLIOT D. OSTROVE

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*Attorneys for Plaintiffs Martin Trott and  
Christopher Smith, as Joint Official  
Liquidators and Foreign Representatives of  
Platinum Partners Value Arbitrage Fund  
L.P. (in Official Liquidation), and Platinum  
Partners Value Arbitrage Fund L.P. (in  
Official Liquidation)*

SO ORDERED:

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