

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

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
Plaintiff,	:	
-v-	:	
	:	
PLATINUM MANAGEMENT (NY) LLC;	:	No. 16-cv-6848 (BMC)
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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**STIPULATION AND ORDER**

This Stipulation and Order is entered into by and between (1) Melanie L. Cyganowski, the duly appointed Receiver (the “*Receiver*”) for (i) Platinum Credit Management, L.P., (ii) Platinum Partners Credit Opportunities Master Fund LP, (iii) Platinum Partners Credit Opportunities Fund (TE) LLC, (iv) Platinum Partners Credit Opportunities Fund LLC, (v) Platinum Partners Credit Opportunities Fund (BL) LLC, (vi) Platinum Partners Credit Opportunities Fund International Ltd, (vii) Platinum Partners Credit Opportunities Fund International (A) Ltd, (viii) Platinum Liquid Opportunity Management (NY) LLC, (ix) Platinum Partners Liquid Opportunity Fund (USA) L.P., and (x) Platinum Partners Liquid Opportunity Master Fund L.P., (2) Rachelle Frisby and John Johnston of Deloitte Ltd., in their capacities as the Joint Provisional Liquidators and authorized foreign representatives (the “*JPLs*”) for PB Life and Annuity Co., Ltd. (“*PBLA*”), Omnia Ltd. (“*Omnia*”) and PB Investment Holdings Ltd. (“*PBIHL*,” together with PBLA and Omnia, the “*Debtors*”), and (3) Senior Health Insurance Company of Pennsylvania in Rehabilitation

(“*SHIP*”). Each of the Receiver, the JPLs, and SHIP shall be referred to singularly as a “*Party*” and collectively as the “*Parties*.”

**WHEREAS**, on March 18, 2022, the Receiver filed her Motion for Entry of an Order (i) Permanently Enjoining Any Prosecution of Claim No. 145, (ii) Confirming the Receiver’s Disallowance of Claim No. 145, and (iii) Confirming the Receiver’s Authority to Consent to the Release of the Indemnity Escrow Amount [Dkt No. 624] (the “*Motion*”); and

**WHEREAS**, as set forth in the Motion, any opposition to the Motion, if made by a non-party, must be electronically mailed to the Receiver so as to be actually received no later than May 9, 2022 (the “*Opposition Deadline*”); and

**WHEREAS**, on March 18, 2022, the Receiver served the JPLs with a copy of the Motion; and

**WHEREAS**, on May 9, 2022, the Court entered a Stipulation and Order, which extended the Opposition Deadline for the JPLs, and the JPLs alone, to file opposition to the Motion to May 31, 2022 [Dkt. No. 629]; and

**WHEREAS**, the JPLs, as of the time of this Stipulation and Order, have not yet opposed the Motion; and

**WHEREAS**, the JPLs have requested, and the Receiver and SHIP have agreed, to further extend the Opposition Deadline for the JPLs, and the JPLs alone, to file opposition to the Motion;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND ORDERED AS FOLLOWS:**

1. The Opposition Deadline for the JPLs, and the JPLs alone, to file opposition to the Motion is further extended to June 14, 2022.

2. The JPLs' time, and the JPLs' time alone, to file opposition to the Motion shall be held in abeyance until after the Court has so-ordered this Stipulation and Order or advised the Parties that it declines to do so. In the event the Court declines to so-order this Stipulation and Order, the JPLs shall have five days to file opposition to the Motion.
3. The Receiver and SHIP shall have ten days from the filing of any opposition by the JPLs to file any replies in support of the Motion.
4. This Stipulation and Order may be executed by email.

*REMAINDER OF PAGE INTENTIONALLY LEFT BLANK.*

Dated: New York, New York  
May 31, 2022

**OTTERBOURG P.C.**

By: /s/ Erik B. Weinick  
Erik B. Weinick  
230 Park Avenue  
New York, New York 10169  
Tel.: (212) 661-9100  
Fax: (212) 682-6104  
eweinick@otterbourg.com  
*Attorneys for Melanie L. Cyganowski,  
as Receiver*

**STEVENS & LEE, P.C.**

By: /s/ Constantine D. Pourakis  
Nicholas F. Kajon  
Constantine D. Pourakis  
485 Madison Avenue, 20th Floor  
New York, New York 10022  
Tel.: (212) 319-8500  
Fax: (212) 319-8505  
nicholas.kajon@stevenslee.com  
constantine.pourakis@stevenslee.com  
*Attorneys for Rachelle Frisby  
and John Johnston, in their capacity as  
Joint Provisional Liquidators and Foreign  
Representatives of the Debtors*

**DLA Piper LLP (US)**

By: /s/ Aidan M. McCormack  
Aidan M. McCormack  
1251 Avenue of the Americas  
New York, New York 10020-1104  
Tel.: (212) 335-4750  
Fax: (917) 778 8750  
aidan.mccormack@dlapiper.com  
*Attorneys for Senior Health Insurance  
Company of Pennsylvania in Rehabilitation*

**SO ORDERED:** 5/31/22  
Digitally signed by Brian M.  
Cogan  
\_\_\_\_\_  
Brian M. Cogan  
United States District Judge