

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

18-cv-6658 (JSR)

MELANIE L. CYGANOWSKI, as Equity
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,

18-cv-12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

[PROPOSED] ORDER GRANTING MOTION TO FILE UNDER SEAL

This matter having come before the Court on an application to file defendants Bankers
Conseco Life Insurance Company and Washington National Insurance Company’s Answer with
Crossclaims and Third-Party Claims Under Seal (the “Answer”), and the Court having been duly
advised, now finds said motion is hereby GRANTED. A redacted version of the Answer will be
filed electronically.

IT IS HEREBY ORDERED that the unredacted version of the Answer shall be maintained under seal.

SO ORDERED.

Dated: March ____, 2019
New York, New York

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