

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

No. 16-cv-6848 (BMC)

-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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**TWENTY-FOURTH INTERIM APPLICATION OF GOLDIN ASSOCIATES, LLC FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES INCURRED DURING THE PERIOD APRIL 1, 2023
THROUGH JUNE 30, 2023**

Goldin Associates, LLC (n/k/a Teneo) (“Goldin”),¹ as financial advisor to Melanie L. Cyganowski, the Court-appointed receiver (the “Receiver”) for Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP (“PPCO”), 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.

¹ In August 2020, Goldin Associates, LLC was acquired by Teneo, the global advisory firm.

(collectively, the “Receivership Entities” or “Platinum”),² hereby submits its Twenty-Fourth Interim Application for Allowance of Compensation and Reimbursement of Expenses Incurred During the Period April 1, 2023 through June 30, 2023 (“Twenty-Fourth Interim Application”). Goldin respectfully requests interim approval for payment of \$3,780.00 in professional fees incurred for the period April 1, 2023 through June 30, 2023 (the “Twenty-Fourth Application Period”).

Goldin’s Twenty-Fourth Interim Application contains the following sections:

- (a) **Section I** contains a preliminary statement of Goldin’s activities in this case during the Twenty-Fourth Application Period.
- (b) **Section II** contains information about Goldin and the case’s status, as required by Section C of the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the “SEC Receivership Billing Instructions”). Section II also includes a description of each exhibit to this Twenty-Third Interim Application, as well as the reduction in fees agreed to by Goldin in connection with its appointment as financial advisor to the Receiver.
- (c) **Section III** contains a narrative of the work that Goldin professionals performed under each activity category, as required by Section D of the SEC Receivership Billing Instructions.
- (d) **Section IV** summarizes the expenses for which Goldin seeks reimbursement, as required by Section E of the SEC Receivership Billing Instructions.

² On December 29, 2017, the Court entered an order approving the expansion of the Receivership Estate to include the following entities: (i) Platinum Partners Liquid Opportunity Master Fund L.P.; (ii) Platinum Partners Credit Opportunities Fund International Ltd; and (iii) Platinum Partners Credit Opportunities Fund International (A) Ltd [Docket No. 298].

(e) **Section V** describes the standards to be applied by the Court in determining fee awards in SEC equity receiverships.

(f) **Section VI** describes the holdback arrangement to which Goldin has agreed.

I. PRELIMINARY STATEMENT

1. During the Twenty-Fourth Application Period, Goldin continued to assist the Receiver and her legal counsel in monitoring certain assets, as well as analyzing potential investor and creditor claims.

2. In addition, during the Twenty-Fourth Application Period, Goldin continued to manage a variety of cash disbursement and budgeting protocols on behalf of the Receivership Estate. For instance, Goldin (i) prepared 13-Week cash receipts and disbursements forecasts; (ii) performed variance analyses regarding Platinum's cash position; (iii) oversaw the procedures governing the review and approval of disbursements (including payroll); and (iv) conducted reconciliations of Platinum's cash and brokerage accounts.

II. APPLICATION REQUIREMENTS

A. Information about the Applicant and the Application

4. **Application Period.** This application covers the period of April 1, 2023 through June 30, 2023.

5. **Appointment of the Receiver.** On December 19, 2016, the U.S. Attorney for the Eastern District of New York unsealed an eight-count indictment (the "Indictment") against seven individuals who were formerly affiliated with Platinum, a purported \$1.7 billion hedge-fund family based in New York. The Indictment alleged that the defendants defrauded Platinum investors through, among other things, the overvaluation of assets, the concealment of severe cash flow

problems and the preferential payment of redemptions. The Indictment also charged four of the defendants with defrauding the independent bondholders of Black Elk Energy Offshore Operations, LLC, a portfolio company owned by Platinum, through a fraudulent offering document and diverting more than \$95 million in proceeds to Platinum by falsely representing in the offering document that Platinum controlled approximately \$18 million of the bonds when, in fact, Platinum controlled more than \$98 million of the bonds.

On December 19, 2016, the SEC filed this action, asserting violations of the anti-fraud provisions of federal securities laws and seeking, among other relief, temporary and permanent injunctive relief, disgorgement of ill-gotten gains, imposition of civil penalties, and appointment of a receiver [Docket No. 1].

On December 19, 2016, the Court entered an Order to Show Cause and Temporary Restraining Order against the defendants, granting certain specified relief to the SEC, including the appointment of a receiver, and granting the receiver control over the assets of the Receivership Entities [Docket No. 5].

Also on December 19, 2016, the Court entered the Order Appointing Receiver, as amended on January 30, 2017 [Docket Nos. 6 and 59], naming Bart Schwartz as the initial receiver.

On January 31, 2017, the initial receiver sought to retain Cooley LLP as his counsel and Guidepost Solutions LLC to advise, assist and support him with his duties as receiver. [Docket Nos. 63 and 65]. Such retention applications were approved by the Court on February 17, 2017.

On June 23, 2017, Mr. Schwartz requested that the Court approve his resignation as receiver, effective upon the Court's appointment of a successor receiver [Docket No. 170]. On

July 6, 2017, the Court accepted the resignation of Mr. Schwartz and appointed Melanie L. Cyganowski as his successor [Docket No. 216].

6. **Appointment of the Applicant.** The Amended Receiver Order authorized the Receiver to engage professionals to assist in fulfilling her duties. On July 21, 2017, the Court approved Goldin’s retention as the Receiver’s financial advisor *nunc pro tunc* to July 6, 2017 [Docket No. 232].

7. **Fee Schedule.** The names and hourly rates of the Goldin professionals who billed time during the Twenty-Fourth Application Period is attached as **Exhibit B** (the “Fee Schedule”). The fees requested in this Twenty-Fourth Interim Application were determined on the basis of the hours worked by Goldin professionals and Goldin’s usual and customary hourly rates in effect at the time of its retention in this matter, as modified by a 10% public service discount.

8. **Prior Applications.** This application is interim and is Goldin’s twenty-third fee and expense application in this case. The fees and expenses requested by Goldin in its previous fee and expense applications were allowed and paid as follows:

Period	Order Date Docket No.	Amount Requested		Amount Allowed		Amount Paid to Date	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
7/6/17-9/30/17	12/5/17 Docket No. 290	\$985,666.50	\$1,350.24	\$985,666.50	\$1,360.24	\$788,533.20	\$1,350.24
10/1/17-12/31/17	3/05/18 Docket No. 310	\$629,210.25	\$1,825.42	\$629,210.25	\$1,825.42	\$471,907.69	\$1,825.42
1/1/18-3/31/18	6/17/18 Docket No. 341	\$744,147.00	\$1,689.42	\$744,147.00	\$1,689.42	\$595,317.60	\$1,689.42

Period	Order Date Docket No.	Amount Requested		Amount Allowed		Amount Paid to Date	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
4/1/18-6/30/18	12/17/18 Docket No. 428	\$970,161.75	\$1,937.01	\$970,161.75	\$1,937.01	\$776,129.40	\$1,937.01
7/1/18-9/30/18	12/17/18 Docket No. 427	\$805,900.50	\$1,124.35	\$805,900.50	\$1,124.35	\$644,720.40	\$1,124.35
10/1/18-12/31/18	7/16/19 Docket No. 477	\$834,330.38	\$1,956.81	\$834,330.38	\$1,956.81	\$667,464.30	\$1,956.81
1/1/19-3/31/19	7/16/19 Docket No. 479	\$504,528.79	\$1,112.83	\$504,528.79	\$1,112.83	\$444,807.08	\$1,112.83
4/1/19-6/30/19	12/26/19 Docket No. 508	\$259,250.84	\$597.41	\$259,250.84	\$597.41	\$220,358.85	\$597.41
7/1/19-9/30/19	12/30/19 Docket No. 510	\$101,240.21	\$26.56	\$101,240.21	\$26.56	\$89,147.40	\$26.56
10/1/19-12/31/19	3/9/20 Docket No. 528	\$128,003.86	\$84.48	\$128,003.86	\$84.48	\$110,565.83	\$84.48
1/1/20-3/31/20	6/4/20 Docket No. 534	\$137,160.56	\$41.29	\$137,160.56	\$41.29	\$110,167.40	\$41.29
4/1/20-6/30/20	11/12/20 Docket No. 545	\$141,727.50	\$19.51	\$141,727.50	\$19.51	\$113,401.51	\$19.51
7/1/20-9/30/20	12/21/20 Docket No. 558	\$80,642.25	\$51.55	\$80,642.25	\$51.55	\$64,565.35	\$51.55
10/1/20-12/31/20	6/11/21 Docket No. 568	\$89,599.50	\$11.88	\$89,599.50	\$11.88	\$71,679.60	\$11.88
1/1/21-3/31/21	8/2/21 Docket No. 589	\$52,069.50	\$1.92	\$52,069.50	\$1.92	\$41,655.60	\$1.92
4/1/21 – 6/30/21	11/23/21 Docket No. 601	\$91,842.50	\$0.00	\$91,842.50	\$0.00	\$73,474.00	\$0.00

Period	Order Date Docket No.	Amount Requested		Amount Allowed		Amount Paid to Date	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
7/1/21 – 9/30/21	12/21/21 Docket No. 616	\$52,170.75	\$0.00	\$52,170.75	\$0.00	\$41,736.60	\$0.00
10/1/21-12/31/21	6/6/22 Docket No. 636	\$37,514.25	\$0.00	\$37,514.25	\$0.00	\$30,011.40	\$0.00
1/1/22 – 3/31/22	7/29/22 Docket No. 650	\$13,259.25	\$0.00	\$13,259.25	\$0.00	\$10,607.40	\$0.00
4/1/22-6/30/22	11/7/22 Docket No. 660	\$10,289.25	\$0.00	\$10,289.25	\$0.00	\$8,231.40	\$0.00
7/1/22-9/30/22	12/9/22 Docket No. 664	\$18,423.00	\$0.00	\$18,423.00	\$0.00	\$14,738.40	\$0.00
10/1/22-12/31/22	Docket No. 669	\$10,440.00	\$0.00	\$10,440.00	\$0.00	\$8,352.00	\$0.00
1/1/23-3/31/23	Docket No. 675	\$3,784.00	\$0.00	\$3,784.00	\$0.00	\$3,027.20	\$0.00

B. Case Status

9. **Cash on Hand and Unencumbered Funds.** As of June 30, 2023, the Receivership Entities had approximately \$17.8 million in funds. Certain parties have claimed an interest in certain sold assets and have asserts claims to a person of the sale proceeds of such assets (as opposed to a general claim against the Receivership Entities). Other parties have presented documentation which purportedly grant them security interests in all or certain of Platinum’s assets. These secured claims were challenged and have been substantially resolved pursuant to settlements in the Beechwood litigation and an agreement with Heartland Bank,

(a) **Accrued Administrative Expenses.** As of June 30, 2023, it is estimated that accrued, unpaid administrative expenses amount to approximately \$4.8 million.

These administrative expenses primarily consist of accrued and unpaid professional fees. In addition to these unpaid administrative expenses, the Receivership Estate paid remaining in-house Platinum staff and other operating expenses.

10. **Summary of Receipts and Disbursements.** Cash disbursements during the Twenty-Fourth Application Period totaled \$326,845.00. This amount consisted of business assets expenses (primarily consisting of payroll and related expenses paid to Platinum employees, office rent, and payments to Epiq).

11. Cash receipts during the Twenty-Fourth Application Period totaled \$12,209.00, consisting of receipt of restitution funds, interest and installment payments by the Schafer and Weiner law firm in connection with a previously approved settlement agreement.

12. **Closing of Case.** Goldin cannot at this time state when the Receiver will deem it appropriate to seek the conclusion of this case.

13. **Summary of Creditor Claims Proceedings.** Pursuant to the previously-approved bar date procedures motion [Docket No. 453], the bar date to file a proof of claim asserting a claim arising before the Receivership was March 29, 2019 and the bar date for governmental units to file a proof of claim was April 12, 2019. In total, 327 claims were filed prior to the applicable bar date. Some of these claims may be duplicate claims and some may be asserted against non-Receivership Entities. Parties holding investor claims, claims for unpaid redemptions and administrative claims were not required to file proofs of claim.

The Receiver will likely be objecting to certain of the filed and/or deemed filed claims in whole or in part. To facilitate the objection process, the Receiver filed a motion seeking to implement procedures for the reconciliation of claims and the verification of the investment and

withdrawal amounts with respect to the interests held by investors (the “Claims Procedures Motion”). The Court entered an Order approving the Claims Procedures Motion on December 1, 2020 [Docket No. 554].

The Claims Procedures Motion only sought the Court’s approval of the Receiver’s proposed procedures for finalizing the reconciliation and verification of claims and interests; it did not seek approval of the validity, amount, classification, or distribution methodology on account of any claims against, or interests in, any of the Receivership Entities. The Receiver will be filing a separate motion with the Court to approve a plan for making distributions to claimants and investors. The formulation of the plan is ongoing.

14. **Summary of Assets.** The primary assets of the Receivership Estate consist of the following:

- (a) Cash and cash equivalents of approximately \$17,787,658 million.
- (b) Remaining stock and royalty interests, litigation financing and other miscellaneous investments; and
- (c) Potential litigation claims.

15. **Liquidated and Unliquidated Claims.** The Receiver currently holds no liquidated litigation recoveries. The Receiver and the Receivership Team have analyzed other pre- Receivership activities, including transfers made by PPCO and PPLO to other entities and individuals, and the professional services provided by, among others, valuation agents, fund administrators, auditors and legal advisors, to determine if any additional causes of action exist that, on a cost-benefit basis, warrant the commencement of litigation. Where mutual releases are warranted, the Receiver has sought and obtained such releases. Whether and the extent to which

the Receiver may commence additional affirmative actions against, among others, insiders of Platinum, if any, will likely be addressed as part of the proposed plan of distribution and likely reservation of rights.

C. SEC Review

16. Goldin submitted this Twenty-Fourth Interim Application to the SEC and allowed for a thirty-day review period, as required by the SEC Receivership Billing Instructions.

D. Exhibits

17. The Twenty-Fourth Interim Application contains the following exhibits:

(a) **Exhibit A:** The Standardized Fund Accounting Report (“SFAR”) for the period April 1, 2023 through June 30, 2023.

(b) **Exhibit B:** A Fee Schedule showing the total fees billed, hours worked and hourly rates of each Goldin professional involved.

(c) **Exhibit C:** A summary of the total fees billed and hours worked by activity category.

(d) **Exhibit D:** Time records of Goldin professionals listed chronologically by activity category, as required by Section D.5 of the SEC Receivership Billing Instructions.

(e) **Exhibit E:** A summary of all expenses incurred by Goldin, organized by expense category, as required by Section E.1a of the SEC Receivership Billing Instructions.

(f) **Exhibit F:** The certification contemplated by Section A.1 of the SEC Receivership Billing Instructions.

III. SERVICES RENDERED BY GOLDIN DURING THE TWENTY-FOURTH APPLICATION PERIOD

18. Goldin professionals recorded services performed in time increments of one tenth (0.1) of an hour. Goldin made use of a lean team; the senior professionals involved each brought distinct, but essential, expertise to the engagement and were the primary responsible party on different tasks.

19. Per Section D.3 of the SEC Receivership Billing Instructions, Goldin accounted for its time charges during the Twenty-Fourth Application Period by activity categories. Narrative summaries of these activity categories follow.

20. **Accounting (01).** \$3,523.50 requested. During the Twenty-Fourth Application Period, Goldin continued to manage a variety of cash disbursement and budgeting protocols. For example, Goldin conducted periodic reconciliations of Platinum's cash and brokerage accounts as a control. Additionally, Goldin provided day-to-day oversight of Platinum's accounting function, which included monitoring work performed by Platinum's Chief Financial Officer. Mr. Karthik Bhavaraju is the only Goldin professional who billed time in this activity category during the Twenty-Fourth Application Period. Mr. Bhavaraju has principal responsibility for overseeing Platinum's cash disbursement and budgeting protocols.

21. **Case Administration (06).** \$256.50 requested. The Receivership Team endeavored throughout the Twenty-Fourth Application Period to administer the Receivership Estate efficiently. Accordingly, Goldin conferred frequently with the Receiver and her legal counsel to ensure that efforts were coordinated to maximize efficiency. The effective administration of the Receivership Estate also entails communicating with third parties about the status of the Receivership, and addressing questions related thereto. Mr. Marc Kirschner, Senior Advisor, is the only Goldin professional who billed time in this activity category during this

period. He has principal responsibility for organizing Goldin personnel to ensure that their assigned tasks are executed effectively and efficiently.

IV. EXPLANATION OF EXPENSES AND RELATED POLICIES

22. Goldin did not incur any reimbursable out-of-pocket expenses during the Twenty-Fourth Application Period.

V. FACTORS TO BE CONSIDERED BY THE COURT IN AWARDING FEES

23. The case law on equity receiverships sets forth the standards for approving receiver compensation and the fees and expenses for the receiver's retained professionals. The District Court has discretion to determine compensation to be awarded to a court-appointed equity receiver and her retained professionals and "may consider all of the factors involved in a particular receivership in determining the appropriate fee." *Gaskill v. Gordon*, 27 F.3d 248, 253 (7th Cir. 1994). Many authorities (some quite dated) provide "convenient guidelines," but in the final analysis, "the unique fact situation renders direct reliance on precedent impossible." *Securities & Exchange Comm'n v. W.L. Moody & Co.*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff'd*, 519 F. 2d 1087 (5th Cir. 1975).

24. In allowing professional fees in receiverships, "[t]he court will consider . . . the complexity of problems faced, the benefit to the receivership estate, the quality of work performed, and the time records presented." *Securities & Exchange Comm'n v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973); *see also United States v. Code Prods.*, 362 F.2d 669, 673 (3rd Cir. 1966) (court should consider the time, labor and skill required (but not necessarily expended), the fair value of such time, labor and skill, the degree of activity, the dispatch with which the work is conducted and the result obtained). "[R]esults are always relevant." *Securities & Exchange Comm'n v. Elliott*, 953 F.2d 1560, 1577 (11th Cir. 1992),

quoting Moody, 374 F. Supp. at 480, as are the extent to which “a receiver reasonably and diligently discharges his duties.” *Id.*

25. Under these standards Goldin has demonstrated that the amount of fees requested is appropriate. Goldin, in concert with the rest of the Receivership Team, has acted with appropriate dispatch to develop and execute monetization strategies for the Platinum assets. In addition, Goldin, again acting in concert with the rest of the Receivership Team, has expended meaningful effort to analyze potential claims in connection with the preparation of a plan of distribution.

VI. HOLDBACK

26. Goldin has agreed to hold back twenty percent (20%) of its allowed fees for all activity categories, save for the “Litigation Consulting” category. With regard to allowed fees associated with the “Litigation Consulting” category, Goldin has agreed to hold back five percent (5%) of these fees. The holdbacks described in this section, collectively, constitute the Holdback Amount. All payments will be made from the Receivership assets.

WHEREFORE, Goldin respectfully requests that the Court:

- (a) grant interim approval of Goldin’s request for compensation in the amount of \$3,780.00;
- (b) authorize the Receiver to immediately pay from the Receivership assets (i) the allowed fees of Goldin, less the Holdback Amount; and
- (c) grant such other relief as the Court deems appropriate.

Dated: August 11, 2023
New York, NY

Respectfully submitted,

/s/ Marc S. Kirschner

Marc S. Kirschner

Senior Advisor

Goldin Associates, LLC (n/k/a Teneo)

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EXHIBIT A

PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND LP AND AFFILIATED ENTITIES

STANDARDIZED FUND ACCOUNTING REPORT

Reporting Period from 4/01/2023 to 6/30/2023

		Period from 4/1/2023 to 6/30/2023		
		PPCO	PPO	Total
Line 1	Beginning Balance (As of 4/01/2023)	\$ 14,617,770	\$ 3,484,524	\$ 18,102,294
Increases in Fund Balance:				
Line 2	Business Income	-	-	-
Line 3	Cash and Securities	-	-	-
Line 4	Interest/Dividend Income	7,209	-	7,209
Lines 5, 6, 7	Asset Liquidations and Third-Party Litigations Income	5,000	-	5,000
Line 8	Miscellaneous - Other	-	-	-
	Total Funds Available (Lines 1-8)	\$ 14,629,979	\$ 3,484,524	\$ 18,114,503
Decreases in Fund Balance:				
Line 9	Disbursements to Investors/Claimants	-	-	-
Line 10	Disbursements for Receivership Operations	-	-	-
Line 10a	Disbursements to Receiver or Other Professionals	(192,337)	-	(192,337)
Line 10b	Business Asset Expenses	(134,508)	-	(134,508)
Line 10c	Personal Asset Expenses	-	-	-
Line 10d	Investment Expenses	-	-	-
Line 10e	Third-Party Litigation Expenses	-	-	-
	1. Attorney Fees	-	-	-
	2. Litigation Expenses	-	-	-
	Total Third-Party Litigation Expenses	-	-	-
Line 10f	Tax Administrator Fees and Bonds	-	-	-
Line 10g	Federal and State Tax Payments	-	-	-
	Total Disbursements for Receivership Operations	\$(326,845)	\$ -	\$(326,845)
Line 11	Disbursements for Distribution Expenses Paid by the Fund	-	-	-
Line 12	Disbursements to Court/Other	-	-	-
	Total Funds Disbursed	\$(326,845)	\$ -	\$(326,845)
Line 13	Ending Balance (As of 6/30/2023)	\$ 14,303,134	\$ 3,484,524	\$ 17,787,658

EXHIBIT B

Fee Schedule by Professional

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD OF
APRIL 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation ¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1620.00 ²	6.1	\$9,882.00
Peter Feldman ("PF") Partner	1980	\$1240.00	16.0	\$19,840.00
Erik B. Weinick ("EBW") Partner	2002	\$985.00	22.6	\$22,261.00
Michael A. Pantzer ("MAP") Associate	2017	\$525.00	52.4	\$27,510.00
	TOTAL		97.1	\$79,493.00

¹ These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

² The Receiver's hourly billable rate at the time of retention in July 2017 was \$995. As previously agreed with the SEC, the Receiver's aggregate fees have been reduced to discount for any increase in her billable rate since being retained.

EXHIBIT C

Fees by Project Code

**APRIL 2023 - JUNE 2023 SUMMARY OF COMPENSATION BY PROJECT CODE FOR RECEIVER
(WITH DISCOUNTS)**

Project Code	Project Category	Total Hours	Total Fees Recorded	Billable Rate Accommodation¹	Public Service Accommodation²	Total Accommodation	Total Fees Requested
P04	Case Administration	6.0	\$9,882.00	\$3,812.50	\$1,213.90	\$5,026.40	\$4,855.60
	TOTALS:	6.0	\$9,882.00	\$3,812.50	\$1,213.90	\$5,026.40	\$4,855.60

**APRIL 2023 – JUNE 2023 SUMMARY OF COMPENSATION BY PROJECT CODE FOR OTTERBOURG
(WITH DISCOUNTS)**

Project Code	Project Category	Total Hours	Total Fees Recorded	Public Service Accommodation³	Total Fees Requested
P02	Asset Disposition	0.1	\$98.50	\$9.85	\$88.65
P04	Case Administration	90.5	\$69,118.50	\$6,911.85	\$62,206.65
P05	Claims Administration & Objections	0.4	\$394.00	\$39.40	\$354.60
	TOTALS:	91.3	\$69,611.00	\$6,961.10	\$62,649.90

¹ The billable rate accommodation is a reduction in the Receiver's aggregate fees (prior to application of the public service accommodation) to discount for the customary annual increases in her billable rate since October 1, 2017.

² The public service accommodation is 20% for all project codes.

³ The public service accommodation is a ten percent (10%) reduction in Otterbourg's recorded time charges.

**P01– ASSET DISPOSITION
 SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
 FOR PROJECT CODE P01**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation ¹
Erik B. Weinick ("EBW") Partner	2002	\$985.00	.1	\$98.50
	TOTAL		0.1	\$98.50

¹ These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P04 – CASE ADMINISTRATION
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR PROJECT CODE P04**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1620.00 ²	6.1	\$9,882.00
Peter Feldman ("PF") Partner	1980	\$1240.00	16.0	\$19,840.00
Erik B. Weinick ("EBW") Partner	2002	\$985.00	22.1	\$21,768.50
Michael A. Pantzer ("MAP") Associate	2017	\$525.00	52.4	\$27,510.00
	TOTAL		96.6	\$79,000.50

¹ These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

² The Receiver's hourly billable rate at the time of retention in July 2017 was \$995. As previously agreed with the SEC, the Receiver's aggregate fees have been reduced to discount for any increase in her billable rate since being retained.

**P05 – CLAIMS ADMINISTRATION & OBJECTIONS
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR PROJECT CODE P05**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation ¹
Erik B. Weinick ("EBW") Partner	2002	\$985.00	.4	\$394.00
	TOTAL		0.4	\$394.00

¹ These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

EXHIBIT D

Receiver Time Records

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 22126/0901
Matter Name: SEC v. PLATINUM MANAGEMENT (NY) LLC,
et al
Billing Partner: RL STEHL

July 19, 2023
BILL NO. 232478

For Services Rendered Through June 30, 2023:

<u>Phase: P04</u>		<u>Case Administration</u>		
<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/28/23	MLC	Review Documents Review of financial statements and proposed expenses	.40	648.00
05/16/23	MLC	Review Documents Review of financials and proposed expenses	.40	648.00
05/16/23	MLC	Review Documents Defendants: Review of summary of court hearing before Cogan	.30	486.00
05/17/23	MLC	Review Documents Defendants: Follow Up on Report on Court Hearing	.30	486.00
05/17/23	MLC	Prep. Selling S.H. Doc. (inc. Rule 144) Review of certain financial expense reports	.30	486.00
06/01/23	MLC	Review Documents Review of proposed Nordlicht settlement	1.00	1,620.00

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NEW YORK, NY 10169-0075

Client/Matter: 22126/0901
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July 19, 2023
BILL NO. 232478

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/23	MLC	Revision of Documents Review and consideration of revised settlement offer in Nordlicht	.60	972.00
06/02/23	MLC	Telephone Call(s) Telephone call with MAP re: revised settlement offer in Nordlicht	.30	486.00
06/02/23	MLC	Telephone Call(s) Telephone call with Judge Gropper and MAP re: proposed settlement of Nordlicht action	.30	486.00
06/05/23	MLC	Telephone Call(s) Follow up telcon with MAP re proposed settlement of Nordlicht claims	.30	486.00
06/06/23	MLC	Correspondence Correspondence with Mediator re: Nordlicht settlement proposal	.60	972.00
06/09/23	MLC	Correspondence Correspondence with Judge Gropper and MAP re: proposed settlement with Nordlicht	.30	486.00
06/16/23	MLC	Correspondence Correspondence with SEC re: proposed settlement with Nordlicht	.40	648.00

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July 19, 2023
BILL NO. 232478

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/16/23 MLC	Revision of Documents Review and revision to draft settlement agreement with Nordlicht	.60	972.00
TOTAL PHASE P04		6.10	\$9,882.00
		TOTAL FOR SERVICES	\$9,882.00
		TOTAL THIS STATEMENT	\$9,882.00

EXHIBIT E

Otterbourg Time Records

OTTERBOURG P.C.
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 NEW YORK, NY 10169-0075

August 7, 2023
 BILL NO. 232980

Client/Matter No.: 22126/0902
 Matter Name: COUNSEL TO RECEIVER IN SEC v. PLATINUM
 MANAGEMENT
 Billing Partner: RL STEHL

For Services Rendered Through June 30, 2023:

Phase: P02		Asset Disposition	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/23 EBW	Correspondence China Horizon - correspondence with C. Solsvig regarding status.	.10	98.50
TOTAL PHASE P02		.10	\$98.50

Phase: P04		Case Administration	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/23 EBW	Correspondence Nordlicht - attention to mediation.	.60	591.00
04/05/23 EBW	Correspondence Nordlicht - attention to confidential document matters.	.30	295.50

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with E. Weinick and Judge Gropper regarding mediation of adversary.	.40	210.00
04/06/23	EBW	Analysis of Legal Papers Nordlicht - attention to mediation.	.60	591.00
04/06/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with mediator and counsel regarding mediation.	.20	105.00
04/07/23	EBW	Analysis of Legal Papers Nordlicht - attention to adversary proceeding matters and mediation.	1.50	1,477.50
04/07/23	MAP	Correspondence Nordlicht bankruptcy case - correspondence with counsel and mediator regarding mediation.	.30	157.50
04/10/23	EBW	Telephone Call(s) Defendants - teleconference with defendant's counsel regarding case status, and correspondence with Receiver regarding same.	.40	394.00
04/11/23	EBW	Preparation for Conference Nordlicht - preparation for teleconference with mediator	.50	492.50

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Client/Matter: 22126/0902
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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/23	EBW	Telephone Call(s) Nordlicht - teleconference with mediator.	.50	492.50
04/11/23	MAP	Conference call(s) Nordlicht Bankruptcy - Conference call with mediator and counsel for debtor regarding mediation.	.50	262.50
04/13/23	EBW	Telephone Call(s) Nordlicht - teleconference with M. Pantzer and mediator.	.50	492.50
04/13/23	EBW	Analysis of Legal Papers Nordlicht - review of outstanding litigation and mediation issues.	.80	788.00
04/13/23	MAP	Telephone Call(s) Nordlicht Bankruptcy - Call with Judge Gropper regarding mediation, follow-up call with E. Weinick, and follow-up correspondence and research.	.90	472.50
04/14/23	EBW	Analysis of Legal Papers Nordlicht - review of legal issues affecting mediation.	1.50	1,477.50
04/17/23	EBW	Preparation of Memorandum Administrative - preparation of status report.	1.20	1,182.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/23	MAP	Research Nordlicht Bankruptcy - Research and Email Memo to E. Weinick regarding issues related to mediation of adversary proceeding.	1.60	840.00
04/18/23	MAP	Telephone Call(s) Nordlicht Bankruptcy - Call with E. Weinick regarding mediation of adversary proceeding.	.20	105.00
04/19/23	EBW	Preparation of Memorandum Administrative - revisions to status report.	1.10	1,083.50
04/20/23	MAP	Research Nordlicht Bankruptcy - Research in connection with mediation of adversary proceeding.	1.20	630.00
04/20/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with E. Weinick and M. Cyganowski regarding mediation.	.60	315.00
04/21/23	EBW	Analysis of Legal Papers Nordlicht - attention to mediation issues	.90	886.50
04/25/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with Judge Gropper regarding mediation.	.20	105.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/23	EBW	Correspondence Nordlicht - attention to status and strategy.	.30	295.50
05/02/23	MAP	Review Documents Nordlicht Bankruptcy - Review documents in connection with mediation of adversary proceeding.	.30	157.50
05/02/23	MAP	Telephone Call(s) Nordlicht Bankruptcy Case - Calls with Judge Gropper regarding mediation and follow up correspondence and phone call with E. Weinick.	.50	262.50
05/04/23	EBW	Correspondence Nordlicht - attention to mediation and potential settlement issues.	.60	591.00
05/04/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with Receiver and Judge Gropper regarding proposed settlement of adversary proceeding.	.60	315.00
05/04/23	MAP	Draft/revise Nordlicht Bankruptcy - Revise scheduling order and correspondence with Debtor's counsel regarding scheduling.	.40	210.00
05/05/23	EBW	Correspondence Nordlicht - attention to mediation issues.	.60	591.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/23	EBW	Correspondence Nordlicht - attention to mediation.	.40	394.00
05/10/23	MAP	Correspondence Nordlicht - Correspondence with M. Cyganowski regarding settlement of adversary proceeding.	.60	315.00
05/11/23	EBW	Correspondence Nordlicht - attention to settlement matters.	.50	492.50
05/11/23	EBW	Correspondence Banking - attention to bank transfers.	.30	295.50
05/11/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with M. Cyganowski regarding settlement.	.70	367.50
05/16/23	EBW	Telephone Call(s) Defendants - teleconference and correspondence with T. Rogers regarding loss calculation hearing.	.60	591.00
05/17/23	EBW	Correspondence Defendants - correspondence with team regarding loss hearing and related matters.	.80	788.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/23 MAP	Correspondence Review article on Defendants' loss hearing and email correspondence with M. Cyganowski regarding the same.	.30	157.50
05/23/23 EBW	Telephone Call(s) Nordlicht - teleconference with M. Pantzer regarding strategy.	.20	197.00
05/23/23 MAP	Correspondence Nordlicht Bankruptcy - Correspondence with M. Cyganowski and mediator regarding settlement of adversary proceeding.	1.40	735.00
05/24/23 EBW	Review Documents Nordlicht - attention to mediation strategy.	.40	394.00
05/24/23 MAP	Correspondence Nordlicht bankruptcy - correspondence regarding settlement of adversary proceeding.	.40	210.00
05/25/23 EBW	Telephone Call(s) Nordlicht - teleconference with mediator.	.20	197.00
05/25/23 EBW	Correspondence Nordlicht - correspondence with receiver and team regarding strategy.	.20	197.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/25/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with M. Cyganowski, E. Weinick, and Judge Gropper regarding mediation.	.40	210.00
05/25/23	MAP	Telephone Call(s) Nordlicht Bankruptcy - Call with Judge Gropper regarding mediation of adversary proceeding.	.10	52.50
05/27/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence regarding settlement of adversary proceeding.	.20	105.00
05/30/23	EBW	Correspondence Nordlicht - attention to mediation strategy.	.20	197.00
05/30/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with E. Weinick and M. Cyganowski regarding settlement.	.30	157.50
05/31/23	EBW	Review Documents Nordlicht - attention to mediation.	.20	197.00
06/01/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with M. Cyganowski and Judge Gropper regarding settlement of Adversary Proceeding.	1.50	787.50

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/23	EBW	Telephone Call(s) Nordlicht - teleconference with mediator.	.20	197.00
06/02/23	EBW	Correspondence Nordlicht - correspondence regarding settlement.	.70	689.50
06/02/23	MAP	Telephone Call(s) Nordlicht Bankruptcy - Call with Judge Gropper and follow-up with Receiver and E Weinick.	.50	262.50
06/05/23	EBW	Correspondence Nordlicht - correspondence regarding settlement.	.30	295.50
06/05/23	EBW	Preparation of Motion Papers Nordlicht - teleconference with mediator regarding settlement.	.10	98.50
06/05/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with Receiver and Judge Gropper regarding settlement of adversary proceeding.	.80	420.00
06/05/23	MAP	Telephone Call(s) Calls with Judge Gropper, M. Cyganowski, and E. Weinick regarding settlement of adversary proceeding.	.30	157.50

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/06/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with Judge Gropper, M. Cyganowski, and E. Weinick regarding settlement of adversary proceeding.	.80	420.00
06/06/23	MAP	Draft/revise Nordlicht bankruptcy - draft letter regarding settlement of adversary proceeding.	.60	315.00
06/07/23	EBW	Correspondence Nordlicht - attention to settlement issues.	.50	492.50
06/07/23	MAP	Draft/revise Nordlicht Bankruptcy - Revise proposed order and correspondence with A. Makhijani and E. Weinick regarding same	.80	420.00
06/08/23	EBW	Correspondence Nordlicht - attention to settlement matters.	.20	197.00
06/08/23	MAP	Correspondence Nordlicht Bankruptcy - correspondence with bankruptcy court chambers regarding settlement of adversary.	.20	105.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/13/23	MAP	Correspondence Nordlicht Bankruptcy - Correspondence with M. Cyganowski regarding settlement agreement resolving adversary proceeding.	1.20	630.00
06/13/23	MAP	Draft/revise Nordlicht Bankruptcy - Draft settlement agreement resolving adversary proceeding.	2.20	1,155.00
06/14/23	EBW	Preparation of Legal Papers Nordlicht - attention to settlement.	.80	788.00
06/14/23	MAP	Draft/revise Nordlicht Bankruptcy - Revise settlement resolving adversary proceeding.	1.60	840.00
06/15/23	EBW	Conference(s) in Office Nordlicht - conference with Receiver regarding settlement.	.10	98.50
06/15/23	EBW	Preparation of Legal Papers Nordlicht - review of, and revisions to, settlement agreement	.60	591.00
06/15/23	MAP	Draft/revise Nordlicht Bankruptcy - Draft settlement agreement resolving adversary proceeding.	3.90	2,047.50
06/16/23	MAP	Draft/revise Nordlicht bankruptcy - revise motion to approve settlement agreement.	3.80	1,995.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/16/23	MAP	Draft/revise Nordlicht bankruptcy - revise settlement agreement.	1.90	997.50
06/17/23	PF	Review/correct Legal Papers Review and revise settlement agreement with Nordlicht re bankruptcy litigation	3.80	4,712.00
06/17/23	MAP	Draft/revise Nordlicht bankruptcy - revise settlement agreement resolving adversary proceeding.	2.30	1,207.50
06/18/23	PF	Review/correct Legal Papers Review and revise settlement agreement with Nordlicht re bankruptcy litigation	1.90	2,356.00
06/19/23	PF	Review/correct Legal Papers Review and revise settlement agreement with Nordlicht re bankruptcy litigation	.60	744.00
06/19/23	MAP	Draft/revise Nordlicht Bankruptcy - Revise Settlement Agreement resolving adversary proceeding.	1.60	840.00
06/20/23	MAP	Draft/revise Nordlicht Bankruptcy - Revise settlement agreement and exhibits thereto.	1.20	630.00
06/21/23	PF	Preparation of Correspondence Re Nordlicht settlement	.50	620.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/23	MAP	Correspondence Review documents and correspondence with M. Kirschner regarding investor inquiries.	.60	315.00
06/21/23	MAP	Draft/revise Nordlicht bankruptcy - revise settlement agreement resolving adversary proceeding.	1.60	840.00
06/22/23	EBW	Preparation of Motion Papers Nordlicht - attention to settlement.	.20	197.00
06/22/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with opposing counsel regarding settlement agreement.	.20	105.00
06/22/23	MAP	Draft/revise Nordlicht bankruptcy case - revise motion to approve settlement agreement.	1.30	682.50
06/23/23	EBW	Preparation of Motion Papers Nordlicht - attention to settlement.	.80	788.00
06/23/23	MAP	Correspondence Nordlicht bankruptcy - correspondence with M. Cyganowski and E. Weinick regarding settlement agreement.	.30	157.50
06/23/23	MAP	Correspondence Correspondence with party in interest regarding receivership.	.30	157.50

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/23/23	MAP	Draft/revise Nordlicht bankruptcy - revise motion to approve settlement agreement.	2.30	1,207.50
06/24/23	EBW	Preparation of Motion Papers Nordlicht - review of draft settlement motion.	1.10	1,083.50
06/24/23	MAP	Correspondence Nordlicht bankruptcy - correspondence with Otterbourg team regarding settlement motion.	.40	210.00
06/25/23	PF	Review/correct Legal Papers Review and revise motion to approve settlement agreement with Nordlicht re bankruptcy litigation	1.90	2,356.00
06/25/23	MAP	Correspondence Nordlicht bankruptcy - Correspondence with Otterbourg team regarding issues related to settlement agreement.	.60	315.00
06/26/23	MAP	Draft/revise Nordlicht bankruptcy - Revise settlement agreement resolving adversary proceeding.	1.50	787.50
06/27/23	PF	Review/correct Legal Papers Nordlicht settlement agreement: memo of law	1.60	1,984.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/27/23	EBW	Correspondence Administrative - attention to receipt of additional restitution.	.20	197.00
06/27/23	EBW	Preparation of Motion Papers Nordlicht - attention to settlement agreement, motion and communication with Trustee's counsel.	.40	394.00
06/27/23	MAP	Draft/revise Nordlicht bankruptcy - revise motion to approve settlement agreement.	2.20	1,155.00
06/28/23	PF	Review/correct Legal Papers Nordlicht settlement: memo of law	2.20	2,728.00
06/28/23	PF	Telephone Call(s) re: Legal Papers With MAP re Nordlicht settlement	.50	620.00
06/28/23	PF	Review/correct Legal Papers Nordlicht settlement agreement	1.80	2,232.00
06/28/23	MAP	Correspondence Correspondence regarding issues related to claims of Receivership Entity subsidiary.	.20	105.00
06/28/23	MAP	Draft/revise Nordlicht bankruptcy - revise memo of law in support of settlement agreement.	2.20	1,155.00

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August 7, 2023
BILL NO. 232980

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/23 MAP	Draft/revise Nordlicht bankruptcy - revise memo of law in support of settlement agreement.	1.00	525.00
06/30/23 PF	Review/correct Legal Papers Re Nordlicht settlement	.50	620.00
06/30/23 PF	Review/correct Legal Papers Re Nordlicht settlement memo of law; order and confession of judgment	.70	868.00
06/30/23 MAP	Correspondence Correspondence with T. Rogers regarding issues related to settlement agreement with M. Nordlicht.	.20	105.00
TOTAL PHASE P04		90.50	\$69,118.50

Phase: P05 Claims Administration & Objections

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/23 EBW	Telephone Call(s) Investors - teleconference with investor.	.20	197.00
04/11/23 EBW	Telephone Call(s) Claims - teleconference with counsel for indemnification claimant.	.20	197.00

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BILL NO. 232980

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
		TOTAL PHASE P05	.40	\$394.00
			TOTAL FOR SERVICES	\$69,611.00

EXHIBIT F

Expense Summary

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS
FOR THE STATEMENT PERIOD OF
APRIL 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023**

Expense Category	Service Provider (if applicable)	Total Expenses¹
Air Freight	Federal Express	\$21.00
Electronic Research	Westlaw, Pacer	\$1,518.99
Photocopies		\$91.50
TOTAL:		\$1,631.49

¹ The date that appears on the annexed disbursement detail associated with a particular disbursement is as to certain disbursements the date the disbursement is recorded in Otterbourg computer records and not the actual date the disbursement was incurred.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

No. 16-cv-6848 (BMC)

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. :
-----X

[PROPOSED] ORDER APPROVING TWENTY-FOURTH INTERIM APPLICATION OF GOLDIN ASSOCIATES, LLC FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE PERIOD APRIL 1, 2023 THROUGH JUNE 30, 2023

THIS MATTER coming before the Court on the Twenty-Fourth Interim Application of Goldin Associates, LLC (n/k/a Teneo) (“Goldin”) for Allowance of Compensation and Reimbursement of Expenses Incurred During the Period April 1, 2023 through June 30, 2023 (the “Twenty-Fourth Interim Application”)¹ [Dkt. No. TBS]; and the Court having considered the Twenty-Fourth Interim Application and exhibits and other documents filed in support of the Twenty-Fourth Interim Application; and the Court having found that the Twenty-Fourth Interim Application complies with applicable standards for awarding fees and expenses; and after due deliberation and for good and sufficient cause shown; it is hereby

ⁱ Capitalized terms utilized but not otherwise defined herein shall have the meaning ascribed to them in the Twenty-Fourth Interim Application.

ORDERED that the Twenty-Fourth Interim Application for the period covering April 1, 2023 through June 30, 2023 (the “Twenty-Fourth Application Period”) is granted; and it is further

ORDERED that Goldin’s compensation for the Twenty-Fourth Application Period is allowed on an interim basis in the amount of \$3,780.00 (the “Allowed Fees”); and it is further

ORDERED that the Receiver is authorized to immediately pay from the Receivership assets the Allowed Fees, less the Holdback Amount.

Dated: _____, 2023
Brooklyn, New York

THE HON. BRIAN M. COGAN
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK