

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION

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No. 18 Civ. 6658 (JSR)

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),

No. 18 Civ. 10936 (JSR)

Plaintiffs,

v.

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

Defendants.

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MELANIE L. CYGANOWSKI, as Equity Receiver for PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND LP, *et al.*,

No. 18 Civ. 12018 (JSR)

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

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WASHINGTON NATIONAL INSURANCE COMPANY and BANKERS CONSECO LIFE INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

MARK NORDLICHT, *et al.*,

Third-Party Defendants.

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SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., *et al.*,

Third-Party Defendants.

**MOTION TO WITHDRAW APPEARANCE**

The undersigned, having appeared as counsel for David Bodner, Beechwood Re Investments LLC Series C, Monsey Equities LLC, Beechwood Trust No. 7, Beechwood Trust No. 8, Beechwood Trust No. 9, Beechwood Trust No. 10, Beechwood Trust No. 11, Beechwood Trust No. 12, Beechwood Trust No. 13, and Beechwood Trust No. 14 (collectively, the “Bodner Parties”) in the above-captioned consolidated actions on October 16, 2019 (1:18-cv-6658, ECF No. 663), respectfully requests that the Court enter an order directing the Clerk to relieve her as counsel for these parties, remove her appearances from the dockets in the consolidated actions, and remove her name from the ECF distribution lists, due to her imminent departure from Curtis, Mallet-Prevost, Colt & Mosle LLP.

The undersigned’s departure will not affect any pending deadlines nor occasion any delays in these consolidated actions, as other attorneys from Curtis have also appeared and continue to represent the Bodner Parties’ interests in the actions.

Dated: December 17, 2020  
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

*/s/ Abigail Johnston*

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Beechwood Trust No. 8, Beechwood Trust  
No. 9, Beechwood Trust No. 10,  
Beechwood Trust No. 11, Beechwood  
Trust No. 12, Beechwood Trust No. 13,  
and Beechwood Trust No. 14*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2020, I electronically filed the foregoing with the Clerk of the Court for the Southern District of New York, using the CM/ECF system, which will provide notification of such filing to the parties of record.

*/s/ Abigail Johnston*

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Abigail Johnston

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

Third-Party Plaintiff,

v.

PB INVESTMENT HOLDINGS LTD., *et al.*,

Third-Party Defendants.

**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW APPEARANCE**

Upon consideration of the Motion to Withdraw Appearance of Abigail Johnston as counsel on behalf of David Bodner, Beechwood Re Investments LLC Series C, Monsey Equities LLC, Beechwood Trust No. 7, Beechwood Trust No. 8, Beechwood Trust No. 9, Beechwood Trust No. 10, Beechwood Trust No. 11, Beechwood Trust No. 12, Beechwood Trust No. 13, and Beechwood Trust No. 14 (collectively, the “Bodner Parties”) in the above-captioned consolidated actions (ECF No. \_\_) (the “Motion”), it is hereby **ORDERED** that the Motion is **GRANTED**. The Clerk of the Court is directed to relieve Ms. Johnston as counsel for the Bodner Parties, remove her appearance from the docket, and remove her name from the ECF distribution list.

**SO ORDERED.**

Dated: This \_\_\_\_ day of \_\_\_\_\_, 2020

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Jed S. Rakoff  
United States District Judge