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April 26, 2024

Hon. Judge M. Brian Cogan
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *SEC v. Platinum Management (NY) LLC, et al.*, Case No. 16-cv-06848 (BMC)

To the Hon. Judge Cogan:

I represent Richard Stadtmauer in these proceedings and I write to request a one-week extension of the April 26, 2024 deadline to respond to the Receiver's motions to approve settlement with the Black Elk Trustee, Joseph M. Sanfilippo, and Ford O'Brien Landy LLP. No previous requests have been made to extend the deadline to object to the Receiver's settlement with the Black Elk Trustee. One previous request was made by the Receiver for a one-week extension of the objection deadline regarding the settlement with Joseph M. Sanfilippo and Ford O'Brien Landy LLP (Doc. No. 710), which was granted.

Good cause exists for this request to allow Steptoe LLP, the Black Elk Trustee, and Mr. Stadtmauer to assess whether the Receiver's motions create a conflict of interest for Steptoe, whether that conflict can be waived, and, if not, how to proceed. Steptoe merged with the firm Smyser, Kaplan & Veselka LLP on January 16, 2024, which, prior to the merger, had acted as counsel for the Black Elk Trustee in this matter. Steptoe had previously represented Mr. Stadtmauer in this matter. Steptoe initially concluded there was no conflict of interest in representing both Mr. Stadtmauer and the Black Elk Trustee, but the Receiver's recent motion to approve a settlement with the Black Elk Trustee requires further evaluation of that conclusion in light of the proposed priority treatment of the claims sought to be settled. So that all clients' interests may be protected, we respectfully request a 7-day extension. We respectfully submit that this brief extension in this long-running matter will not prejudice any party.

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I have conferred with counsel, and counsel for the Receiver has indicated that it consents to a seven day extension, through and including May 3, 2024, solely for Richard Stadtmauer, and no other individuals or entities, to object to the two pending settlement motions, with the deadline for any replies in further support of the settlement motions adjourned to May 24, 2024. Counsel for Joseph M. Sanfilippo and Ford O'Brien Landy LLP does not consent to any extension and asked that the Court note his objection.

Sincerely,



Nathaniel J. Kritzer