

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re

PLATINUM-BEECHWOOD LITIGATION

Civil Action No. 18-cv-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),

Civil Action No. 18-cv-10936 (JSR)

Plaintiffs,

- against -

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

Defendants.

[PROPOSED] JOINT PRE-TRIAL CONSENT ORDER

Pursuant to Fed. R. Civ. P. 26(a)(3) of the Federal Rules of Civil Procedure and the Individual Rules of Hon. Jed S. Rakoff, Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (“**JOLs**”) and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (“**PPVA**” and collectively with the JOLs, “**Plaintiffs**”) and Defendant David Bodner (“**Bodner**” or “**Defendant**”) jointly submit this Pretrial Consent Order for the trial set to begin on November 30, 2022 (the “**Trial**”).

I. Joint Overview of the Case.

PPVA is a Cayman exempted limited partnership and master hedge fund currently subject to liquidation proceedings in the Grand Court of the Cayman Islands. The JOLs are the liquidators

and foreign representatives authorized to collect and liquidate the assets of PPVA, including through the commencement of claims against third parties. This case involves the Plaintiffs' claims against David Bodner arising from his alleged failure to disclose the allegedly fraudulent overstatement of PPVA's net asset value ("NAV"), and the damages arising from that alleged overvaluation.

i. Plaintiffs' contentions

Plaintiffs contend that, at all relevant times until the commencement of the liquidation in August 2016, Bodner was a fiduciary of both PPVA and Platinum Management (NY) LLC ("PMNY" or "**Platinum Management**") (PPVA's general partner and investment manager). Bodner had special knowledge and insight into PPVA's day-to-day operations, its investment strategy, investor relations, and valuation. He also had decision making authority over all aspects of PPVA, including the ability to veto proposed actions, proposed investments, general partner logistical decisions, the admission of members to PMNY, and the payment of management or incentive fees to PMNY and PMNY's members. Bodner actively procured debt and equity investments for PPVA; was held out by other PMNY partners and employees as a fiduciary of PPVA; and was viewed by PPVA's investors as a fiduciary and "in charge" of PPVA. In sum, Bodner was one of the titular "Platinum Partners" along with Murray Huberfeld and Mark Nordlicht.

Plaintiffs contend that after the November 2012 explosion at Black Elk (PPVA's largest investment), Bodner took and approved a series of steps to conceal the fact that PPVA's NAV was collapsing in value. At no point after November 2012 did Black Elk's value ever recover or increase.

These steps included the founding and capitalization of the Beechwood group of reinsurance entities and the formation and ownership of the BEOF group of entities. In particular, the BEOF entities were used to conceal the drop in value of PPVA's investment in Black Elk, while the Beechwood entities were used to conceal the fact that PMNY's valuation of PPVA's interests in Black Elk and various other significant investment assets was significantly overstated. In particular, Beechwood was used as a vehicle to hold the debt of PPVA's investment assets that were either in default or seriously distressed; and Beechwood (at the direction of PMNY) declined to exercise enforcement rights with respect to that bad debt, so that Platinum Management's equity valuations for those same investments held by PPVA would appear plausible. In other words, if the debt that PPVA transferred to Beechwood had actually been defaulted and the creditors' rights been enforced, PMNY's fraudulent valuations of those entities would have been obvious.

Plaintiffs further contend that, at the very least or in the alternative: (i) Bodner was a fiduciary of PPVA and PMNY and had actual knowledge of the NAV overvaluation and failed to stop the overvaluation or disclose it to PPVA's stakeholders; (ii) Bodner was a fiduciary of PPVA and PMNY and was grossly negligent or reckless in failing to identify and prevent the overvaluation; (iii) Bodner materially profited from all of these intentional, grossly negligent, and reckless acts and omissions, and as such, all management fees, distributions, incentive fees in cash or in the form of limited partnership interests or other interests that Bodner (through Grosser Lane, Monsey Equities or other Bodner-controlled entities) received should be disgorged or forfeited from Bodner as a fiduciary in breach of his fiduciary duties as a faithless servant; and (iv) PPVA was damaged by these intentional, grossly negligent, and reckless acts and omissions. Moreover, Plaintiffs will demonstrate that Bodner became aware of the NAV overvaluation by no later than the end of 2014 and exercised his authority to issue a mandate to PPVA and PMNY that no further

cash incentive fees would be distributed. Plaintiffs will further demonstrate that Bodner was presented with information in late 2015 and early 2016 indicating that in addition to PPVA's NAV being overstated, the PPVA NAV calculated by PMNY from 2015 onwards failed to account for significant guarantees and liabilities in connection with Beechwood, an entity Bodner owned, controlled at least in part, and had specialized information about. At no time after receiving this information did Bodner take action to inform either the authorities or PPVA's stakeholders of the fraud and breach of fiduciary duty by PMNY. Plaintiffs expect Bodner to contend that the audits of PPVA's financial statements are evidence that PPVA was properly valued, but this argument fails because: (i) the monthly NAV of PPVA was established by PMNY, not the auditors and valuation agents retained by PMNY, which third parties were denied critical information regarding PPVA's liabilities, the true scope of the relationship between Platinum/Beechwood and the failing nature of PPVA's investment portfolio; and (ii) Bodner has admitted that he never reviewed or relied on PPVA's audited financial statements or quarterly third-party valuation reports.

While David Bodner contends that he has been released from liability pursuant to a written release agreement dated March 2016 and signed by Mark Nordlicht of PMNY on behalf of PPVA as manager and general partner of PPVA, this agreement is void and unenforceable as against public policy because it represents a corrupt attempt by joint tortfeasors and co-conspirators to release each other. In particular, PMNY could not, as a joint tortfeasor and co-conspirator with Bodner, issue a valid release on behalf of PPVA to David Bodner. In any event, Bodner as a fiduciary and as an insider with special knowledge either (i) knew of the PPVA overvaluation after March 2016 and failed to disclose or stop the same, causing damage to PPVA; or (ii) acted in a manner that was reckless or grossly negligent in failing to know of the overvaluation, causing damage to PPVA.

ii. Defendant's contentions

Bodner contends that Plaintiffs cannot meet their heavy burden to prove that the March 20, 2016 Release Agreement, which was executed as an integral component of a transaction whereby billionaire investor Marcos Katz intended to acquire an ownership interest in the Platinum management companies, was signed for a fraudulent purpose. The Release Agreement was entered into as part of a genuine, negotiated arm's-length transaction among multiple parties intended to provide urgently needed liquidity to PPVA. Counsel for Platinum Management and PPVA (in-house lawyers Suzanne Horowitz and Harvey Werblowsky), as well as Marcos Katz and his counsel (Isaac Neuberger), were fully aware of and assented to the terms of the Release Agreement, as part of the larger investment and equity ownership deal for which Marcos Katz and his wife later executed agreements by June 7, 2016. The Release Agreement is valid and enforceable against all parties, including PPVA, and Bodner is entitled to a verdict in his favor.

Bodner further contends that he was never a fiduciary of PPVA. Bodner helped found the fund by making an initial "seed" investment in 2003. In return, a company he owns with his wife, non-party Grosser Lane Management LLC, received in return a 24.99 percent "passive membership interest" (which was later diluted) in Platinum Management and the companies that earned the performance fees from managing the fund. Bodner did not control PPVA or Platinum Management. Mark Nordlicht, the Chief Investment Officer of Platinum Management, enjoyed both majority ownership of Platinum Management and effective control of it throughout the relevant time period of January 1, 2013 through March 31, 2016. Nordlicht had final say over investment and valuation decisions. Bodner was not an officer, director, or employee of any Platinum entity. He did not manage assets. No employee other than his personal assistant reported to him. Platinum Management did not list Bodner in PPVA marketing materials, or in its SEC

filings where it publicly disclosed its control persons. Bodner was never able to make decisions on behalf of PPVA.

Bodner had no role (either official or *de facto*) in Platinum Management's valuation process for PPVA illiquid "Level 3" assets. He was not privy to detailed or confidential information about Platinum Management's valuation methodologies or process. He had no role in the Platinum Management valuation committee. He had no knowledge that PPVA's NAV was inflated. He never created any investment entities or otherwise acted with the purpose of contributing to artificial inflation of PPVA's NAV, or to conceal such artificial inflation. While Plaintiffs contend that Bodner received distributions from PPVA on account of incentive fees after a January 2015 dinner meeting where he and Nordlicht had a disagreement about PPVA, that is untrue. Bodner did not receive a distribution of incentive fees from PPVA after February 2014. The last such distribution by PPVA on account of incentive fees to anyone appears to be in May 2014 to Nordlicht.

Bodner further contends that, in the event the jury finds him liable for any of Plaintiffs' duplicative counts for breach of fiduciary duty, fraud, and aiding and abetting breach of fiduciary duty, any award would have to be reduced post-verdict pursuant to N.Y. Gen. Obl. L. § 15-108, as multiple persons who were also accused of participating in the NAV fraud have entered into settlement agreements and/or been released by Plaintiffs. These include the President of Platinum Management, Uri Landesman; its Chief Financial Officer, Joseph SanFilippo; its Chief Compliance Officer, David Ottensoser; its Chief Risk Officer, David Steinberg; its independent auditors, Cohn Reznick; as well as Platinum Management partners Bernard Fuchs and Murray Huberfeld; and portfolio manager Ezra Beren. Plaintiffs have not provided Bodner with a

complete list of persons that have been released and who were claimed to have participated in the inflation of PPVA's NAV.

Finally, Bodner contends that Plaintiffs' pretrial disclosures to date, including their contentions throughout this Joint Pre-Trial Consent Order and their lists of witnesses, exhibits, and deposition designations, as well as their motions *in limine*, improperly seek to introduce at trial evidence of and references to matters that this Court already adjudicated and/or excluded from this litigation in its prior rulings on summary judgment (ECF No. 624) and Bodner's motion to exclude the expert testimony of Ronald Quintero (ECF No. 646)—to wit, related-party Beechwood transactions such as the Agera sale, the Black Elk scheme, the Montsant transactions; the theory that Bodner breached his fiduciary duty to PPVA, or provided substantive assistance to Platinum Management's breach, by creating and capitalizing Beechwood and BEOF for the purposes of causing PPVA to engage in insider transactions with Beechwood and BEOF; the opinions of their valuation expert comparing the values reported by Platinum Management and the values assigned by third-party valuers, and regarding the valuations of PPVA positions Over Everything and China Horizon; and all other matters unrelated to Bodner's alleged failure to disclose what he allegedly knew were the fraudulent overvaluations of the six PPVA assets at issue. Such matters are not proper subjects of evidence or argument at this trial.

II. Particularized Description of Plaintiffs' Remaining Claims.

Following this Court's April 21, 2020 Opinion and Order [ECF No. 624] ("**Summary Judgment Opinion**"), the Plaintiffs proceed to trial against Bodner on the following claims, to the extent such claims are based on the overvaluation of PPVA's NAV:

A. Breach of Fiduciary Duty – Counts I and II of Plaintiffs' Second Amended Complaint [ECF No. 285] ("**SAC**") asserts claims against Bodner for breach of his duty of care and duty of loyalty under New York law. Plaintiffs contend that: (i) Bodner was a fiduciary of

PPVA and PMNY and had actual knowledge of PPVA's NAV overvaluation and failed to stop the overvaluation or disclose it, even though he had the authority to do so; (ii) Bodner was a fiduciary of PPVA and PMNY and was grossly negligent or reckless in failing to identify and prevent the overvaluation; (iii) Bodner materially profited from all of these intentional, grossly negligent and reckless acts and omissions, and all management fees, distributions, incentive fees in cash or in the form of limited partnership interests or other interests that Bodner (through Grosser Lane, Monsey Equities or other Bodner-controlled entities) received should be disgorged or forfeited from Bodner as a fiduciary in breach of his fiduciary duties as a faithless servant; and (iv) the intentional, grossly negligent and reckless acts and omissions of Bodner were the proximate cause of the damages suffered by PPVA.

B. Aiding and Abetting Breach of Fiduciary Duty – Count III of the SAC asserts a claim against Bodner for aiding and abetting PMNY's breach of its fiduciary duty to PPVA in connection with the overvaluation of PPVA's NAV under New York law. It is undisputed that PMNY, as general partner of and investment manager to PPVA, is a fiduciary of PPVA. Plaintiffs contend that on and after December 2012, PMNY breached its fiduciary duties to PPVA by intentionally and fraudulently overvaluing PPVA's NAV, by overvaluing PPVA's failing investments and failing to account for liabilities incurred to Beechwood and the BEOF Funds. Bodner provided knowing substantial assistance to PMNY's breach by: (i) failing to wield his authority to correct PPVA's overvalued NAV; and (ii) creating and capitalizing Beechwood and BEOF for the purposes of causing PPVA to engage in insider transactions with Beechwood and BEOF to mask the failure of PPVA's investment portfolio and support PPVA's false NAV. The intentional, grossly negligent and reckless acts and omissions of Bodner were the proximate cause of the damages suffered by PPVA.

C. Fraud/Constructive Fraud – Counts IV and V of the SAC assert claims against Bodner for common law fraud and constructive fraud under New York law. Plaintiff contends that in and after December 2012, PMNY and its owners and managers, including Bodner, made material misrepresentations on a monthly basis to PPVA concerning its NAV, and the resulting fees and other costs owed by PPVA in the form of management fees, incentive allocations and other costs. PPVA justifiably relied upon the misrepresentations and omissions from its NAV as PMNY was its general partner and investment manager, and PMNY had reposed trust and confidence in, *inter alia*, Bodner to wield ultimate decision making authority over PPVA. Further, as a fiduciary and as an individual with “special knowledge” of PPVA’s overvaluation due to his confidential, insider role at PMNY, Bodner’s omissions in failing to correct PPVA’s NAV are actionable under PPVA’s fraud claims. *SNS Bank, N.V. v. Citibank, N.A.*, 777 N.Y.S. 2d 62, 66 (1st Dep’t 2004); *Aetna Cas. & Sur. Co. v. Aniero Concrete Co.*, 404 F. 3d 566, 582 (2d Cir. 2005) (per curiam).

D. Aiding and Abetting Fraud – Count VI of the SAC asserts a claim against Bodner for aiding and abetting PMNY’s fraudulent overvaluation of PPVA’s NAV. Bodner provided knowing substantial assistance to the overvaluation fraud by: (i) failing to wield his authority to correct PMNY’s fraudulent misrepresentation of PPVA’s NAV; (ii) creating and capitalizing Beechwood and BEOF for the purposes of causing PPVA to engage in insider transactions with Beechwood and BEOF to mask the failure of PPVA’s investment portfolio and support PPVA’s false NAV. The intentional, grossly negligent and reckless acts and omissions of Bodner were the proximate cause of the damages suffered by PPVA.

Bodner disputes Plaintiffs’ claims against Bodner in their entirety. Platinum Management and Bodner executed a Release Agreement which is valid and enforceable. Bodner was never a

fiduciary of PPVA or Platinum Management and never had actual knowledge of fraud, nor did he aid or abet any breach of fiduciary duty or fraud upon PPVA.

III. Particularized Statements of Fact, Stipulations, Admissions, and Agreed Upon Matters.

The Plaintiffs and Bodner hereby stipulate to the following facts:

1. In or about 2003, Bodner helped launch PPVA by providing a substantial seed investment.

2. Grosser Lane Management, LLC (“**Grosser Lane**”), an entity for which Bodner and his wife are listed as members, held a right to receive a portion of the incentive fees due to the general partner of PPVA’s feeder funds, Platinum Partners Value Arbitrage, LP (the “**General Partner**”).

3. Grosser Lane was not itself a member of the General Partner; it was a beneficiary of the Mark Nordlicht Grantor Trust (the “**MNG Trust**”). The MNG Trust held 65 percent of the membership interests of Platinum Management (which collected the management fees) and the General Partner.

4. The MNG Trust instrument states that Grosser Lane is entitled to 38.45 percent of the distributions therefrom, the purpose of which was to provide Grosser Lane with a 24.99 percent “passive membership interest” in Platinum Management.

5. By virtue of dilution through admission of new members, Grosser Lane was, through its interests in the MNG Trust, entitled in 2013-2016 to approximately 20 percent of the profits generated through the management of PPVA and the other funds managed by Platinum Management.

6. Nordlicht was at all times the Chief Investment Officer of Platinum Management. Uri Landesman was the Managing Member of Platinum Management.

7. Platinum Management was the investment manager and general partner of PPVA.

8. The PPVA limited partnership agreement provides that “management of the Partnership shall be vested exclusively in the General Partner,” and the parties’ Fourth Amended and Restated Investment Management Agreement appointed Platinum Management as PPVA’s investment manager.

IV. Particularized Contentions as to Disputed Facts.

A. Plaintiffs’ Statement

1. In 2003, Bodner, Murray Huberfeld (“**Huberfeld**”), and Nordlicht formed PMNY and a group of investment funds including PPVA.

2. Since PPVA’s inception, Bodner had fiduciary responsibility over PMNY and PPVA, and, along with Huberfeld, had final and ultimate authority over all operational and investment decisions for PPVA.

3. At all relevant times following the creation of PMNY, Bodner had special knowledge and insider information concerning the performance of PPVA’s investments and the true value of PPVA’s NAV due to his position as a founder and fiduciary of PMNY and PPVA.

4. Nordlicht (then PMNY’s chief investment officer) and other PMNY employees regularly updated Bodner with special and confidential information regarding the operational failures of certain of PPVA’s investments and the inflated value of PPVA’s NAV, which information was not disclosed to the auditors and valuation companies retained by PMNY on behalf of PPVA. This information included, but was not limited to: (i) the overvaluation of PPVA’s investment interests in Black Elk Energy Offshore Operations, LLC (“**Black Elk**”) directly following the November 2012 explosion on Black Elk’s West Delta 32 oil platform (the “**Black Elk Explosion**”); and (ii) the non-performance of PPVA’s investment in Golden Gate Oil,

LLC (“GGO”) since its inception, and PMNY’s refusal to account for GGO’s non-performance in performing PPVA’s NAV calculations, and the relationship between Platinum and Beechwood.

5. As a consequence of the Black Elk Explosion and PMNY’s failure to accurately value PPVA’s NAV, any and all incentive fees paid to Bodner or any other party with funds deriving from PPVA in or after November 2012 were unearned and Bodner was aware that the NAV of PPVA had *decreased* in the calendar year 2012. Similarly, in or after November 2012, PMNY received inflated payments of management fees with funds deriving from PMNY due to the overvaluation of PPVA’s NAV.

6. Bodner was aware that PPVA’s NAV was overvalued in and after November 2012, and Bodner never took any affirmative step to correct PMNY’s monthly reporting of PPVA’s NAV, despite his fiduciary obligation to do so. Bodner personally approved the decision to tell then-investor Bernie Fuchs about the Black Elk detriment.

7. Following the Black Elk Explosion, Bodner, Huberfeld, and Nordlicht took steps to create the investment entities referred to as the BEOF Funds for the purpose of masking or artificially inflating the decreased value of PPVA’s investment in Black Elk. The true value of PPVA’s investment in Black Elk was further deflated by the January 2013 decision of PMNY to subordinate PPVA’s interests in Black Elk to that of the BEOF Funds and assume interest payments to the BEOF Funds, of which Bodner was well aware.

8. Bodner also capitalized and formed the Beechwood reinsurance enterprise along with Nordlicht and Huberfeld. The fraudulent utilization of Beechwood was to apply Beechwood funds to PPVA investments (which Beechwood co-investments were fully guaranteed by PPVA) such as Black Elk, GGO and other companies, in order to falsely prop up the value of PPVA’s

NAV, and create the illusion that the PPVA investment equity valuations were reasonable even though significant relevant debt, transferred to Beechwood, was in default or distress.

9. Bodner had knowledge and significant input into Beechwood's investment allocations due to his position as a member of the "Nordlicht Group" (which included Nordlicht, Bodner and Huberfeld). Bodner had final authority over Beechwood's investment decisions, similar to his authority over PMNY and PPVA.

10. From February 2014 and at all relevant times thereafter, Bodner had knowledge that PMNY had caused PPVA to incur millions of dollars of debt to Beechwood in connection with guarantee/put option obligations on PPVA/Beechwood co-investments, and that such debts were not accurately incorporated into the calculation of PPVA's NAV.

11. Following the August 2014 sale of Black Elk's assets to Renaissance Offshore, LLC, Bodner had knowledge that the true value of PPVA's equity investment in Black Elk was zero and that PPVA's holdings of Black Elk bonds were compromised.

12. In January 2015, Fuchs was informed of PPVA's overvaluation by Bodner at a meeting of PMNY's partners, which included Nordlicht, Huberfeld, Bodner and Fuchs. At the same meeting, Bodner made the decision that none of the partners of PMNY would receive incentive fees going forward and that none of the partners would be permitted to take their investments out of PPVA, a decision he had the power and authority to unilaterally enforce.

13. In January 2016, Bodner received a presentation from Seth Gerszberg and David Steinberg at the direction of Nordlicht, which outlined the debts PPVA owed to Beechwood and concluded that PPVA's NAV was materially overstated and cash-flow insolvent, wherein large assets ascribed eight to nine-figure valuations on prior and subsequent NAV statements were accorded no value, lowered value or lowered net value on the basis that the Beechwood "debts"

were valid. Bodner had detailed and special knowledge that PPVA's NAV was significantly overvalued.

14. Bodner was aware of the numerous government investigations into PMNY and its founders, which began in 2013 with an audit of PMNY's books and records, and expanded in February 2016 into an investigation of the Platinum/Beechwood relationship (the "**Expanding Government Investigations**").

15. On March 20, 2016, a Release Agreement (the "**Release**") was executed by, among others, PMNY, Nordlicht (on behalf of PMNY and other entities including PPVA), Huberfeld, and Bodner. The intent of Nordlicht, Bodner, Huberfeld and PMNY in relation to the Release was to release each other from liability due to their collective roles in, among other fraudulent acts, fraudulently overvaluing PPVA's NAV.

16. The fire sale of PPVA's interests in Agera Energy, LLC ("**Agera**") the day after the arrest of Huberfeld was the foreseeable consequence of the overvaluation of PPVA's NAV, as the sale of Agera was designed to unwind Beechwood's holdings of debt in various failing PPVA investments which were initially transferred to Beechwood to effectuate the overvaluation of PPVA's NAV.

B. Defendant's Statement

i. Bodner's Role at Platinum

1. By virtue of the various agreements governing Platinum Management and its ownership and fee structures, Mark Nordlicht was in total control of Platinum Management at all times. As trustee of the MNG Trust, which owned 65 percent of the voting membership interests in Platinum Management, and his personal holding of an additional 10 percent of the voting membership interests in Platinum Management, Nordlicht controlled 75 percent of Platinum Management's voting interests. Platinum Management's LLC Agreement provides that 75

percent of the voting interests can control all decisions of the company, including the appointment or replacement of a managing member. Furthermore, the MNG Trust instrument expressly provides that neither Grosser Lane nor Bodner nor any other beneficiary could replace the trustee (Nordlicht) or exercise control over Platinum Management.

2. As such, Nordlicht had final say over investment and valuation decisions for PPVA. Bodner had no control as a matter of law and as a matter of fact. Bodner had no legal ability to replace Nordlicht or to control the internal affairs of the company. The governing documents (the MNG Trust and LLC Agreement of Platinum Management) expressly stripped Bodner of any legal power with respect to Platinum Management.

3. Bodner had no role at Platinum Management or PPVA. He was never an officer, director, or employee of any Platinum entity, nor was any employee required to report to him. He did not manage assets. He was never a member of PPVA management, never met with auditors, and was best characterized as a large investor. He never directed or instructed the actions of Platinum Management portfolio managers. He had no power to overrule Nordlicht. He was never offered, nor did he accept, any responsibility over the affairs of Platinum Management, particularly as relating to the business of PPVA. Platinum Management never disclosed Bodner to investors or to the investing public as a control person or as someone with a fiduciary role.

4. Bodner lacked detailed knowledge about Platinum Management valuation processes and methodologies for PPVA, and was not regularly informed about such matters in any meaningful detail.

5. Bodner's reputation as a savvy and experienced investor meant that younger portfolio managers and others at Platinum Management sometimes sought his opinion. However, he did not have any ability to make decisions on behalf of Platinum Management.

6. Bodner did not solicit prospective investors for PPVA other than his own family members and charitable foundation (although he was occasionally asked to do so).

7. Bodner was never a member of the Valuation Committee at Platinum Management, and had no role in making, overseeing, or implementing valuation decisions.

8. While Bodner received general updates about PPVA performance in his capacity as a significant investor and indirect beneficiary of the MNG Trust, he did not have detailed or specific knowledge of the fund's underlying assets.

9. There is no evidence that Bodner ever believed or expressed that PPVA's NAV was fraudulently inflated, or that he learned of fraudulent valuations. Bodner never created any investment entities or otherwise acted with the purpose of contributing to artificial inflation of NAV, or to conceal such artificial inflation. He never believed or knew the true value of any PPVA investment to be less than its marked value.

10. After early 2014, due to a lack of liquidity at PPVA, the General Partner ceased making cash distributions of incentive fees to its members, and the PPVA feeder funds fell behind in paying the management fees that they owed to Platinum Management. No member of the General Partner was permitted a cash withdrawal of incentive fees after May 2014, and Bodner took his last such withdrawal in February 2014.

11. In or about January 2015, Bodner expressed at a dinner meeting that he disagreed with Nordlicht's approach of marking up investment positions based on unrealized gains, and Nordlicht firmly rejected his input. There was no discussion at that meeting about any potential fraudulent overvaluation.

ii. Valuation Process

A. *Sterling and A&M*

12. On December 9, 2008, Sterling Valuation Group (“**Sterling**”) was engaged to provide “quarterly reports expressing [its] conclusions regarding the fair value of portfolios held by Platinum Partners Value Arbitrage Fund LP, including: (i) a portfolio of selected private investments[.]” (PPVA_RH_0698806, Sterling Engagement Letter).

13. Sterling provided reports to PPVA through the second quarter of 2015. (CTRL7424192, August 12, 2015 Sterling Report on PPVA valuations as of June 30, 2015).

14. On May 16, 2013, Sterling sent Joseph SanFilippo at Platinum Management a report “express[ing] an opinion . . . on the fair value, as of March 31, 2013, of the Fund’s interest” in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL4657796, May 16, 2013 Sterling Report on PPVA valuations as of March 31, 2013).

15. In its May 16, 2013 report, Sterling ascribed the following ranges of values to PPVA’s investments in Black Elk, Desert Hawk and Golden Gate as of March 31, 2013:

	Sterling Low Value	Sterling High Value
Black Elk	\$222,131,413	\$290,709,176
Desert Hawk	\$5,918,053	\$26,918,053
Golden Gate	\$49,390,370	\$55,150,370

(CTRL4657796, May 16, 2013 Sterling Report on PPVA valuations as of March 31, 2013).

16. On July 30, 2013, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of June 30, 2013, of the Fund’s interest” in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL4760091, July 30, 2013 Sterling Report on PPVA valuations as of June 30, 2013).

17. In its July 30, 2013 report, Sterling ascribed the following ranges of values to PPVA’s investments in Black Elk, Desert Hawk and Golden Gate as of June 30, 2013:

	Sterling Low Value	Sterling High Value
Black Elk	\$230,708,829	\$262,500,443
Desert Hawk	\$27,015,492	\$27,015,492

Golden Gate	\$61,164,142	\$65,900,384
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(CTRL4760091, July 30, 2013 Sterling Report on PPVA valuations as of June 30, 2013).

18. On October 30, 2013, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of September 30, 2013, of the Fund’s interest” in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL4957010, October 30, 2013 Sterling Report on PPVA valuations as of September 30, 2013).

19. In its October 30, 2013 report, Sterling ascribed the following ranges of values to PPVA’s investments in Black Elk, Desert Hawk and Golden Gate as of September 30, 2013:

	Sterling Low Value	Sterling High Value
Black Elk	\$252,352,225	\$283,404,471
Desert Hawk	\$26,165,492	\$26,165,492
Golden Gate	\$66,972,606	\$71,417,199

(CTRL4957010, October 30, 2013 Sterling Report on PPVA valuations as of September 30, 2013).

20. On April 30, 2014, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of December 31, 2013, of the Fund’s interest” in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL6324638, April 30, 2014 Sterling Report on PPVA valuations as of December 31, 2013).

21. In its April 30, 2014 report, Sterling ascribed the following ranges of values to PPVA’s investments in Black Elk, Desert Hawk and Golden Gate as of December 31, 2013:

	Sterling Low Value	Sterling High Value
Black Elk	\$186,146,281	\$195,041,136
Desert Hawk	\$22,128,397	\$26,025,000
Golden Gate	\$175,009,679	\$197,532,266

(CTRL6324638, April 30, 2014 Sterling Report on PPVA valuations as of December 31, 2013).

22. On June 16, 2014, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of March 31, 2014, of the Fund’s interest” in certain investments, including,

inter alia, Black Elk, Desert Hawk, and Golden Gate. (CTRL5683673, June 16, 2014 Sterling Report on PPVA valuations as of March 31, 2014).

23. In its June 16, 2014 report, Sterling ascribed the following ranges of values to PPVA's investments in Black Elk, Desert Hawk and Golden Gate as of March 31, 2014:

	Sterling Low Value	Sterling High Value
Black Elk (Common Units)	\$144,671,023	\$186,328,469
Desert Hawk	\$15,849,117	\$19,401,651
Golden Gate	\$144,033,690	\$176,000,000

(CTRL5683673, June 16, 2014 Sterling Report on PPVA valuations as of March 31, 2014).

24. On September 19, 2014, Sterling sent SanFilippo a report "express[ing] an opinion . . . on the fair value, as of June 30, 2014, of the Fund's interest" in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL6583975, September 19, 2014 Sterling Report on PPVA valuations as of June 30, 2014).

25. In its September 19, 2014 report, Sterling ascribed the following ranges of values to PPVA's investments in Black Elk, Desert Hawk and Golden Gate as of June 30, 2014:

	Sterling Low Value	Sterling High Value
Black Elk (Common Units)	\$125,926,920	\$150,884,464
Black Elk (Preferred Units)	\$46,183,326	\$46,183,326
Black Elk Note Receivable (Accrued Interest)	\$1,758,997	\$1,758,997
Desert Hawk	\$16,060,070	\$19,176,804
Golden Gate (Note Receivable)	\$6,578,019	\$6,578,019
Golden Gate (Equity)	\$134,922,656	\$176,000,000

(CTRL6583975, September 19, 2014 Sterling Report on PPVA valuations as of June 30, 2014).

26. On February 22, 2015, Sterling sent SanFilippo a report "express[ing] an opinion . . . on the fair value, as of September 30, 2014, of the Fund's interest" in certain investments, including, *inter alia*, Black Elk, Desert Hawk, and Golden Gate. (CTRL6681535, February 22, 2015 Sterling Report on PPVA valuations as of September 30, 2014).

27. In its February 22, 2015 report, Sterling ascribed the following ranges of values to PPVA's investments in Black Elk, Desert Hawk and Golden Gate as of September 30, 2014:

	Sterling Low Value	Sterling High Value
Black Elk (Common Equity)	\$46,096,857	\$58,000,000
Black Elk (Preferred Equity)	\$7,939,448	\$7,939,448
Desert Hawk (Equity)	\$12,205,616	\$17,817,953
Desert Hawk (Debt)	\$14,713,058	\$14,713,058
Golden Gate (Debt)	\$11,782,727	\$11,782,727
Golden Gate (Equity)	\$172,096,347	\$181,000,000

(CTRL6681535, February 22, 2015 Sterling Report on PPVA valuations as of September 30, 2014).

28. On June 11, 2015, Sterling sent SanFilippo a report "express[ing] an opinion . . . on the fair value, as of December 31, 2014, of the Fund's interest" in certain investments, including, *inter alia*, Desert Hawk and "PPVA Oil and Gas," which included Black Elk, Golden Gate and Northstar. (CTRL6963500, June 11, 2015 Sterling Report on PPVA valuations as of December 31, 2014).

29. In its June 11, 2015 report, Sterling ascribed the following ranges of values to PPVA's investments in Desert Hawk and PPVA Oil and Gas as of December 31, 2014:

	Sterling Low Value	Sterling High Value
Desert Hawk (Equity)	\$13,834,636	\$19,062,285
Desert Hawk (Debt)	\$15,164,989	\$15,164,989
PPVA Oil and Gas		
Black Elk Preferred Equity	\$8,031,969	\$8,031,969
Black Elk Note Receivable (Accrued Interest)	\$1,758,997	\$1,758,997
Golden Gate Oil Debt	\$10,570,776	\$10,570,776
Northstar GOM Holdings and 12% Corporate Bond	\$9,905,363	\$9,905,363
Northstar GOM Holdings 12% Note Receivable	\$5,090,333	\$5,090,333
PPVA Oil and Gas Common Equity (includes Northstar, Golden Gate and Black Elk)	\$239,419,923	\$293,040,404
Northstar PPLO	\$6,894,643	\$6,894,643

(CTRL6963500, June 11, 2015 Sterling Report on PPVA valuations as of December 31, 2014).

30. On May 20, 2015, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of March 31, 2015, of the Fund’s interest” in certain investments, including, *inter alia*, Desert Hawk and “PPVA Oil and Gas,” which included Black Elk, Golden Gate and Northstar. (CTRL7450171, May 20, 2015 Sterling Report on PPVA valuations as of March 31, 2015).

31. In its May 20, 2015 report, Sterling ascribed the following ranges of values to PPVA’s investments in Desert Hawk and PPVA Oil and Gas as of March 31, 2015:

	Sterling Low Value	Sterling High Value
Desert Hawk (Equity)	\$12,717,044	\$19,497,059
Desert Hawk (Debt)	\$15,607,094	\$15,607,094
PPVA Oil and Gas		
Black Elk Preferred Equity	\$8,031,969	\$8,031,969
Black Elk Note Receivable (Accrued Interest)	\$1,758,997	\$1,758,997
Golden Gate Oil Debt	\$12,483,147	\$12,483,147
Northstar / Golden Gate Oil Equity	\$239,614,560	\$293,235,041
Northstar GOM Holdings (Preferred Units)	\$31,542,858	\$31,542,858
Northstar GOM Holdings 12% Corporate Bond	\$130,000	\$130,000
Northstar GOM Holdings 12% Corporate Bond	\$5,240,333	\$5,240,333
Northstar debt	\$9,580,363	\$9,580,363

(CTRL7450171, May 20, 2015 Sterling Report on PPVA valuations as of March 31, 2015).

32. On August 12, 2015, Sterling sent SanFilippo a report “express[ing] an opinion . . . on the fair value, as of June 30, 2015, of the Fund’s interest” in certain investments, including, *inter alia*, Desert Hawk, Pedevco and “PPVA Oil and Gas,” which included Black Elk, Golden Gate and Northstar. (CTRL7424192, August 12, 2015 Sterling Report on PPVA valuations as of June 30, 2015).

33. In its August 12, 2015 report, Sterling ascribed the following ranges of values to PPVA's investments in Desert Hawk, Pedevco and PPVA Oil and Gas as of June 30, 2015:

	Sterling Low Value	Sterling High Value
Desert Hawk (Equity)	\$15,515,394	\$19,181,409
Desert Hawk (Debt)	\$2,312,358	\$2,315,358
Pedevco & Caspian Energy	\$32,142,535	\$32,907,570
Pedevco Debt with Golden Globe	\$8,353,496	\$8,353,496
Pedevco Debt with RJ Resources	\$5,399,702	\$5,399,702
PPVA Oil and Gas		
Black Elk Preferred Equity	\$6,666,534	\$6,666,534
Golden Gate Oil Debt	\$14,723,813	\$14,723,813
Northstar / Golden Gate Oil Equity	\$225,878,200	\$279,498,684
Northstar Class A Preferred Units	\$45,406,100	\$45,406,100
Northstar PPLO	\$3,393,479	\$3,393,479

(CTRL7424192, August 12, 2015 Sterling Report on PPVA valuations as of June 30, 2015).

34. On April 16, 2015, Platinum Partners, LP engaged Alvarez & Marsal Valuation Services, LLC (“A&M”) to “provide an independent estimate of the range of fair value of certain investments . . . held by funds managed by Platinum Partners as of March 31, 2015 (the ‘Valuation Date’)” and “subsequent valuation dates” as “determined at the discretion of Management.” (CTRL6704880, A&M Engagement Letter).

35. On September 21, 2015, A&M sent Daniel Mandelbaum at Platinum Partners, LP a report containing “an estimated range of Fair Value” as of June 30, 2015 for certain investments in “Portfolio Companies owned by PPVA,” including, *inter alia*, PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk. (CTRL7564023, September 21, 2015 A&M Report on PPVA valuations as of June 30, 2015).

36. In its September 21, 2015 report, A&M ascribed the following ranges of values to PPVA's investments in PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk as of June 30, 2015:

Issuer	Investment	Concluded Fair Value Range (\$000s)
PPVA Oil & Gas (Northstar and Golden Gate)	Note receivable / Preferred equity / Common equity	\$282,370 – \$351,830
Black Elk	Preferred equity / Common equity	\$7,900 – \$8,600
Pedevco	Notes receivable / Preferred equity / Common equity / Options	\$36,600 – \$41,400
Desert Hawk	Term loan / Common equity	\$19,800 – \$21,300

(CTRL7564023, September 21, 2015 A&M Report on PPVA valuations as of June 30, 2015).

37. On October 29, 2015, A&M sent Daniel Mandelbaum at Platinum Partners, LP a report containing “an estimated range of Fair Value” as of September 30, 2015 for certain investments in “Portfolio Companies owned by PPVA,” including, *inter alia*, PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk. (CTRL7595256, October 29, 2015 A&M Report on PPVA valuations as of September 30, 2015).

38. In its October 29, 2015 report, A&M ascribed the following ranges of values to PPVA’s investments in PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk as of June 30, 2015:

Issuer	Investment	Concluded Fair Value Range (\$000s)
PPVA Oil & Gas (Northstar and Golden Gate)	Common equity	\$219,100 – \$282,300
Golden Gate Oil	Senior secured promissory note	\$15,573 – \$15,761
Northstar Offshore	Preferred equity	\$51,204
Black Elk	Preferred equity / Common equity	\$3,900 – \$5,600
Pedevco	Senior secured notes / subordinate notes / Preferred equity / Common equity / Warrants / Caspian equity & options	\$29,837 – \$30,247
Desert Hawk	Term loan / Common equity	\$19,101 – \$22,924

(CTRL7595256, October 29, 2015 A&M Report on PPVA valuations as of September 30, 2015).

39. On March 8, 2016, A&M sent SanFilippo at Platinum Partners, LP a report containing “an estimated range of Fair Value” as of December 31, 2015 for certain investments in “Portfolio Companies owned by PPVA,” including, *inter alia*, PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk. (CTRL7754971, March 8, 2016 A&M Report on PPVA valuations as of December 31, 2015).

40. In its March 8, 2016 report, A&M ascribed the following ranges of values to PPVA’s investments in PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk as of December 31, 2015:

Issuer	Investment	Concluded Fair Value Range (\$000s)
PPVA Oil & Gas (Northstar and Golden Gate)	Common equity	\$184,600 – \$245,500
	Senior secured promissory note	\$16,551 – \$16,945
	Preferred equity units	\$58,850
	Delayed Draw Term Note	\$1,182 – \$1,183
Pedevco	Senior secured notes receivable / Subordinate notes receivable / Common equity / Senior and Junior Warrants / Caspian Energy common equity & options	\$33,157 – \$33,426
Desert Hawk	Equity ownership	\$9,530 – \$12,449

(CTRL7754971, March 8, 2016 A&M Report on PPVA valuations as of December 31, 2015).

41. On June 9, 2016, A&M sent SanFilippo at Platinum Partners, LP a report containing “an estimated range of Fair Value” as of March 31, 2016 for certain investments in “Portfolio Companies owned by PPVA,” including, *inter alia*, PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk. (CTRL8049261, June 9, 2016 A&M Report on PPVA valuations as of March 31, 2016).

42. In its June 9, 2016 report, A&M ascribed the following ranges of values to PPVA's investments in PPVA Oil & Gas (including Northstar & Golden Gate), Black Elk, Pedevco and Desert Hawk as of March 31, 2016:

Issuer	Investment	Concluded Fair Value Range (\$000s)
PPVA Oil & Gas (Northstar and Golden Gate)	Common equity	\$202,500 – \$243,100
	Senior secured promissory note	\$16,732 – \$17,117
	Preferred equity units	\$60,831
Pedevco	Delayed Draw Term Loan / Second Priority Senior Secured Notes	\$22,304 – \$22,511
	Senior secured notes receivable / Subordinate notes receivable / Common equity / Senior and Junior Warrants / Caspian Energy common equity & options	\$27,923 – \$28,140
Desert Hawk	Equity ownership	\$23,084 – \$31,841

(CTRL8049261, June 9, 2016 A&M Report on PPVA valuations as of March 31, 2016).

B. BDO, CRZ and VRC

43. BDO Cayman Ltd. (“**BDO**”) was PPVA's independent auditor for the year ended December 31, 2013. (CTRL7709216, PPVA's Audited Financial Statements for the Year Ended Dec. 31, 2013).

44. In connection with its audit of PPVA's financial statements for the year ended December 31, 2013, BDO Consulting (“**BDOC**”), BDO's valuation group, prepared a report entitled “FASB ASC 820 (SFAS 157) Review Report,” which was approved by BDO Engagement Partner, Keith McGowan, on January 11, 2015. (C-Plat-00039970, BDO FASB ASC 820 Review).

45. BDOC's FASB ASC 820 Report reflects, *inter alia*:

- a. BDOC “estimated a sensitivity value range” of PPVA’s common equity in Golden Gate “between \$146.4 million to \$177.4 million” as of December 31, 2013 and noted that “[t]he Fund’s concluded equity value of \$173.1 million falls within BDO Consulting’s sensitivity range.” (C-Plat-00039970 at p. 46, BDO FASB ASC 820 Review).
 - b. BDOC “estimated the sensitivity value” of PPVA’s investment in Black Elk in the “range[] [of] \$172.0 million to \$184.0 million” as of December 31, 2013 and noted that “Management’s fair value conclusion of \$185.0 million is approximately \$1.0 million higher than BDO Consulting’s sensitivity range.” (C-Plat-00039970 at p. 32, BDO FASB ASC 820 Review). BDOC’s report notes that “Management made an adjustment to the fair value of investment in Black Elk. Adjusted fair value as of 12/31/2013 was \$183M which falls within the range.” *Id.*
 - c. BDOC estimated a “sensitivity range” of PPVA’s investment in Desert Hawk between “\$12,840,048” and “14,269,312” as of December 31, 2013. (C-Plat-00039970 at p. 41, BDO FASB ASC 820 Review).
46. On February 11, 2015, BDO issued an “Independent Auditor’s Report,” in which it expressed the “Opinion” that PPVA’s financial statements “present fairly, in all material respects, the consolidated financial position of Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries as of December 31, 2013, and the consolidated results of their operations, changes in partners’ capital and their cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.” (CTRL7709216, PPVA’s Audited Financial Statements for the Year Ended Dec. 31, 2013).

47. CohnReznick LLP (“**CRZ**”) was PPVA’s independent auditor for the year ended December 31, 2014. (CTRL7537293, PPVA’s Audited Financial Statements for the Year Ended Dec. 31, 2014).

48. In connection with its audit of PPVA’s financial statements for the year ended December 31, 2014, CRZ engaged Valuation Research Corporation (“**VRC**”), an independent valuation firm, to “provide a valuation report” for PPVA’s investments in Golden Gate and Northstar. (PPVA_RH_0447222, GF11.17.9, VRC Engagement Letter).

49. VRC issued a report in which it provided the following ranges of values for PPVA’s equity investments in Golden Gate and Northstar as of December 31, 2014:

Golden Gate		
Low Value	Mid Value	High Value
\$106,058,845	\$124,541,900	\$143,024,955

Northstar		
Low Value	Mid Value	High Value
\$106,729,410	\$127,280,615	\$147,831,820

(PPVA_RH_0447222, P7.15.10, VRC Report).

50. On September 16, 2015, CRZ issued an “Independent Auditor’s Report,” in which it expressed the “Opinion” that PPVA’s financial statements “present fairly, in all material respects, the financial position of Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries as of December 31, 2014, and the results of their operations, their changes in partners’ capital and their cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.” (CTRL7537293, PPVA’s Audited Financial Statements for the Year Ended Dec. 31, 2014).

51. CRZ’s Independent Auditor’s Report included the following “Emphasis-of-Matter”:

As discussed in Note 4 to the consolidated financial statements, the consolidated financial statements include certain investments valued at \$800,853,473 (104.09% of partners' capital) as of December 31, 2014. The fair values of these investments have been estimated by management using inputs that are unobservable for the investments. Such estimated values may not necessarily represent amounts that will be ultimately realized in the near term through distribution, sale or liquidation of the investments, and the differences could be material. Our opinion is not modified with respect to this matter.

(CTRL7537293, PPVA's Audited Financial Statements for the Year Ended Dec. 31, 2014).

iii. Release

52. Even though no incentive fee distributions were made after May 2014, PPVA had substantial negative outflows in 2014 and 2015, and PPVA began to face serious liquidity problems. PPVA soon could not satisfy investors' redemption requests. One large investor who requested a redemption in 2015 was the billionaire Marcos Katz. Around this time, Nordlicht asked Bodner and Huberfeld to provide a cash infusion to Platinum and they declined. Platinum Management soon approached Katz about making an additional \$10 million investment and thereby acquiring an ownership interest in the Management Companies. Platinum Management hoped to obtain liquidity from other large investors as well.

53. In February 2016, Katz's grandson, Michael Katz, negotiated with Platinum Management (following Marcos Katz's instructions and on his behalf) a term sheet whereby Marcos would acquire between 7.5 percent and 15 percent ownership of the Management Companies and benefit from rebalancing of his PPVA and PPCO investments; with Bodner and Huberfeld to return their respective shares and the parties exchanging mutual releases.

54. In these negotiations, which related to a broader transaction with billionaire PPVA investor Marcos Katz, Platinum Management was represented by Suzanne Horowitz and Harvey Werblowsky; and Marcos Katz and his family were represented by Isaac Neuberger. All parties were represented by counsel in extensive arm's-length negotiations during and after March 2016

regarding the main investment agreement, rebalancing agreement, and mutual releases among the parties. As part of this process, on March 20, 2016, Bodner and PPVA executed the Release Agreement. Among other things, they exchanged mutual releases of “[a]ny and all [claims] . . . based in whole or in part on any act or omissions, transaction, or event in connection in any manner whatsoever with [PPVA].” After that date, Platinum Management recorded Bodner’s family’s interests in the MNG Trust as forfeited, and Bodner performed pursuant to the Release Agreement by, among other things, forbearing from submitting a redemption to PPVA and other funds managed by Platinum Management affiliates.

55. Negotiations between the Katz family and Platinum Management continued for almost three months. Marcos Katz and his wife, Adela, signed copies of the investment and rebalancing agreements sometime prior to June 7, 2016. However, following Huberfeld’s arrest on unrelated charges and Marcos’s death, Platinum Management agreed to relieve the Katz family from its contractual obligations in July 2016.

iv. Particularized Statement of Damages.

Plaintiffs’ Position

Plaintiffs seek the following monetary damages at trial:

A. Joint and Several Liability for Cash Payments of Incentive Fees – Plaintiffs seeks monetary damages in connection with the payment of all incentive fees on or after December 2012 with funds originating from PPVA, at which point Plaintiffs contend all incentive fees were unearned. This includes (i) \$13,997,109 paid to Platinum Partners Value Arbitrage, LP (the “GP”); and (ii) \$17,179,405 in cash payments to Bodner, Huberfeld, Nordlicht or Uri Landesman in connection with the redemption of limited partner interests in PPVA previously provided to PMNY’s owners as payment of incentive fees. As a subset of these damages, the Plaintiffs seek

clawback of \$9,851,489 in incentive fees/masked redemption payments to Bodner and various entities under his ownership and/or control, including entities set up by Bodner in the name of his family members.

B. Equitable Disgorgement or Forfeiture of Bodner's Receipt of Incentive Fees in the Form of Non-Cash LP Interests – Plaintiffs seek equitable disgorgement or forfeiture of \$7,460,000 million in non-cash limited partner interests in PPVA's feeder funds provided to Bodner and entities under his ownership and control as incentive fees, including entities set up by Bodner in the name of his family members.

C. Management Fees – Ronald Quintero, Plaintiffs' expert, will testify that due to the improper inflation of PPVA's NAV, PPVA was caused to pay unearned management fees to PMNY in the amount of \$15,844,000. Alternatively, Mr. Quintero will testify that by June 2014, PPVA should have been wound up, and all management fees paid to PMNY from that date forward (\$30,995,361.86) were improperly paid.

D. Agera Damages – Plaintiffs seek monetary damages in connection with the sale of Agera as the foreseeable consequence of the fraudulent overvaluation of PPVA's NAV. Mr. Quintero will testify that the damage to PPVA from the sale of Agera ranges from \$63,500,000 to \$93,800,000.

E. Third-Party Litigation Costs – Plaintiffs seek monetary damages in the amount of \$4,374,927.05 for attorney fees incurred in connection with PPVA's litigation against third-party auditors, as a foreseeable consequence of the fraudulent overvaluation of PPVA's NAV.

Plaintiff further seeks pre-judgment interest accruing since January 2013 and punitive damages.

Defendant's Position

Bodner opposes Plaintiffs' requests for damages in their entirety. First, Bodner is not liable. If the jury finds Bodner liable, then any alleged damages to PPVA incurred before the time the jury finds Bodner was in breach are not recoverable.

Second, regarding incentive fees, if Plaintiffs prevail, they can only recover up to \$13,934,000 in 2013 incentive fees distributed to Platinum Management partners either as (a) cash or (b) non-cash feeder fund interests later redeemed for cash. There were no such distributions after May 2014. To the extent the Court agrees that a "First In, First Out" accounting method is appropriate, this amount is to be further reduced by \$1,934,000 in February and May 2014 cash withdrawals by Landesman and Nordlicht that would have come from 2012 or earlier incentive fees which are not recoverable. (*See* Bodner's Mot. *in Limine*, ECF No. 667.)

Third, regarding management fees, if Plaintiffs prevail, they can recover management fees actually paid based on any NAV overvaluation found by the jury. However, \$5,537,120.94 in accrued management fees as of March 31, 2016 were not paid. Plaintiffs' claim must be reduced by an additional \$338,000, as Plaintiffs have incorrectly included management fees for the PPVA position "Over Everything," an asset that the Court excluded from the case in its *Daubert* Order (ECF No. 646). Of the \$15,844,000 claim, therefore, at most only \$9,968,879.06 could actually have been paid by PPVA, even if the jury accepts the entire amount of alleged overvaluation claimed by Plaintiffs. Plaintiffs also cannot dispute that several allegedly overvalued PPVA assets were placed in a "Side Pocket" share class beginning in December 2015, during which time they accrued management fees at an annual rate of 1.5 percent, not 2 percent. If any of these fees were actually paid—they likely were not—overvaluation damages would have to be further reduced accordingly.

Attached as **Exhibit D** is a detailed memorandum setting forth Defendant's position that, if the jury finds Bodner is liable, damages arising from incentive fees and management fees can and should be calculated by the Court and the parties; in Bodner's view, there is no need for the jury to engage in complex calculations for any fees they find were based upon an inflated NAV. Plaintiffs received a copy of Exhibit D for the first time the night prior to the filing of this proposed order, and reserves all rights to respond to Bodner's position.

Fourth, Bodner objects that Plaintiffs' new, never-pleaded claim for equitable disgorgement—which was a subject of Bodner's Fourth Motion *in Limine* (ECF No. 746)—is improper for the reasons stated in that motion. If the claim survives the motion, it is equitable, and is not triable before the jury.

Fifth, Plaintiffs' request for \$30,995,361.86 in management fees after June 2014 is a blatant attempt to revive attempts by their expert, Quintero, to quantify imagined "earlier redemptions," and is barred by this Court's *Daubert* Order. (ECF No. 646, at 41-42).

Sixth, Plaintiffs' request for Agera damages is barred by the Summary Judgment Order. (ECF No. 624 at 27-28).

Seventh, Plaintiffs' new request for third-party litigation costs is also improper. This was not the subject of any damages claim in the SAC or Plaintiffs' Rule 26(a)(1) initial disclosures; there was no discovery or disclosure on the fees Plaintiffs now claim they have incurred.

Finally, Plaintiffs' claim for punitive damages is improper for the reasons stated in Bodner's Third Motion *in Limine* (ECF No. 671).

A. **Witness List for the Parties.**

The parties recognize this Court's practice that a witness will only testify once. Witnesses who appear on both parties' lists are in **bold**. Because several witnesses appear on both parties' lists, Plaintiffs had suggested that the parties consider that when certain joint witnesses are called,

defense counsel will examine the witness first, followed by Plaintiffs' cross-examination without scope limitations and a defense redirect limited to the scope of cross. Bodner agrees with this proposal solely as it relates to witness David Bodner. Plaintiffs are still considering this proposal and are hopeful of reaching an agreement with Bodner on the issue.

Bodner proposes that the parties use all good-faith efforts to maintain the order of witnesses listed below; that in the event that a party needs to change the anticipated order of a witness, it will provide 48 hours' notice to the other party; and that if extraordinary circumstances outside of a party's control arise that require a change to the order within 48 hours, the next witness on the list will be called in place of the unavailable witness, and the unavailable witness will be called later with the appropriate 48 hours' notice. Plaintiffs propose that the parties use best efforts to maintain the order of its witnesses and to provide the parties and the Court with reasonable notice of any anticipated change to the witness list, but that a strict deadline of 48 hours' notice of any changes to the witness order is not practical, given that there are pending motions for alternative service by both parties, and there are non-extraordinary situations in this particular trial where the witness order will need to be altered.

A. **List of Witnesses Plaintiffs Intends to Call at Trial**

William Post (Plaintiff's Expert)
Bernard Fuchs
Jed Latkin
Seth Gerszberg
Mark Nordlicht
Kerry Propper
Scott Taylor
Randall Katzenstein (through deposition designation)
Michael Katz (through deposition designation)
Maggie McGovern Muller (through deposition designation)
Naftali Manela
Angela Albanese
Naomi Bodner
Ronald Quintero, Plaintiff's Expert

Martin Trott, Joint Official Liquidator of PPVA
Murray Huberfeld
David Bodner

May Call Witnesses:

Mark Feuer
Gabriel Hertzberg
Eliot Lauer
David Levy
David Ottensoser
Abe Han
Daniel Small
David Steinberg

B. List of Witnesses Defendant Intends to Call at Trial

Joseph SanFilippo
David Steinberg
David Bodner
Keith McGowan
Eleonora Tinoco
Jennifer Lange
John Czapla
Murray Grenville
Mark McMahon
Isaac Neuberger

May Call Witnesses:

George Duch
Bart Schwartz
Leon Metzger
Abe Han
Murray Huberfeld
David Ottensoser
Jay Levy
Michelle Keyes
Sze Tam
Suzanne Horowitz
Joshua Geller

In the event Plaintiffs are permitted to introduce evidence about Beechwood that Bodner contends is barred by the Summary Judgment Order (ECF No. 624), Bodner would call the following additional witnesses:

Christian Thomas c/o Mark D. Harris, Esq. Proskauer Rose LLP Eleven Times Square New York, New York 10036
Dhruv Narain c/o Stacey Eilbaum, Esq. Proskauer Rose LLP Eleven Times Square New York, New York 10036

B. Exhibit List and Particularized Objections.

Attached as **Exhibit A** is a list of the parties' joint exhibits. Attached as **Exhibit B** is Plaintiffs' Exhibit List and Defendant's objections thereto. Attached as **Exhibit C** is Defendant's Exhibit List and Plaintiffs' objections thereto. In Plaintiffs' Fed. R. Civ. P. 26(a)(3) disclosures, they took the position that "Defendants should presume that all emails included on the exhibit list will include any attachments to the email as part of the exhibit." Bodner objects to this, and reserves the right to object to attachments whose individual Bates numbers were not disclosed. Plaintiffs' response is that Bodner has been given ample notice that all attachments to emails are included as part of the exhibit, and any objection at trial would be frivolous and a waste of the Court's and the jury's time.

C. Deposition Designations and Particularized Objections

Plaintiffs intend to introduce certain deposition testimony from Maggie McGovern Muller, Michael Katz and Randall Katzenstein. Bodner objects to the designations of both Katz and Katzenstein, because Plaintiffs have not shown these witnesses are unavailable pursuant to Fed. R. Civ. P. 32(a)(4). Katz lives and works in New York, as he testified at deposition, and the

purported service attempts were in Connecticut. Katzenstein’s counsel and company informed Plaintiffs that Katzenstein is in Israel, but did not say whether he would be back before the end of trial. Plaintiffs respond that they understand Katz moved to Connecticut, and that all service attempts in both Connecticut and New York have been unsuccessful. As to Katzenstein, Plaintiffs have been notified by his company that he is current in Israel and has no plans to return.

In the event this Court permits the use of Katz’s and Katzenstein’s deposition testimony, Bodner has offered counter-designations. Attached as **Exhibit E** is a list of each party’s deposition designations and specific objections thereto.

D. Estimated Trial Length.

Bodner’s position is that Trial will take approximately 17 to 20 days, and propose for Friday court sessions to conclude at 2:00 p.m. in accommodation of parties, witnesses, and counsel who observe the Jewish sabbath. Plaintiffs have no objection to Bodner’s request for an early conclusion on Fridays, but maintain the position that Trial should only take 10 days. Bodner’s position is that a 10-day trial may be impossible given the length of Plaintiffs’ witness list and expects to require about 7.5 days for his defense. Plaintiffs have suggested that the parties proceed with a bench trial in this case, and as of the date of this filing, Bodner stands on his right to trial by jury. However, Bodner does suggest in his bench memorandum (*see Exhibit D*) that the jury’s role can be simplified by leaving certain mathematical damages calculations for the Court and parties to address post-trial.

Dated: November 23, 2022

<p>HOLLAND & KNIGHT LLP</p> <p>By: <u>/s/ Warren E. Gluck</u> Warren E. Gluck, Esq. Martin Seidel, Esq. Richard A. Bixter Jr., Esq. (<i>pro hac vice</i>)</p>	<p>CURTIS, MALLETT-PREVOST, COLT & MOSLE LLP</p> <p>By: <u>/s/ Eliot Lauer</u> Eliot Lauer Gabriel Hertzberg Julia Mosse</p>
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<p>HOLLAND & KNIGHT LLP 31 West 52nd Street New York, New York 10019 Telephone: 212-513-3200 Facsimile: 212-385-9010 Email: warren.gluck@hkllaw.com martin.seidel@hkllaw.com richard.bixter@hkllaw.com</p> <p><i>Attorneys for Plaintiffs 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)</i></p>	<p>Nathaniel Ament-Stone 101 Park Avenue New York, New York 10178 Tel.: (212) 696-6000 Fax: (212) 697-1559 Email: elauer@curtis.com ghertzberg@curtis.com jmosse@curtis.com nament-stone@curtis.com</p> <p><i>Attorneys for Defendant David Bodner</i></p>
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HON. JED S. RAKOFF
UNITED STATES DISTRICT JUDGE

DATE

EXHIBIT A

Joint Ex. No.	Doc. ID	Date	Description/Subject	Email Parties
JX 1	CTRL1968806	1/1/11	Platinum Management Second Amended and Restated Operating Agreement	
JX 2	CTRL2146217	12/1/10	Fourth Amended and Restated Investment Management Agreement	
JX 3	CTRL4596511	11/1/12	Platinum Partners Value Arbitrage Fund (USA) L.P. Confidential Private Offering Memorandum	
JX 4	CTRL0726431	11/1/08	Mark Nordlicht Grantor Trust Agreement	
JX 5	CTRL0730025	11/1/08	Manor Lane Management Operating Agreement	
JX 6	CTRL4938126	11/1/08	Grosser Lane Management Operating Agreement	
JX 7	CTRL4410545	1/31/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 8	CTRL4395250	2/28/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 9	CTRL4430756	3/31/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 10	CTRL4458222	4/30/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 11	CTRL4661760	6/30/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 12	CTRL4797089	8/31/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 13	CTRL4805736	9/30/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 14	CTRL4825598	10/31/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 15	CTRL4841308	11/30/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 16	CTRL6084282	12/31/13	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 17	CTRL6273119	1/31/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 18	CTRL6276889	2/28/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 19	CTRL6156713	3/31/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 20	CTRL6328537	4/30/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 21	CTRL6028454	6/30/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 22	CTRL4991036	7/31/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 23	CTRL5911677	10/31/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 24	CTRL6448097	11/30/14	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 25	CTRL6696999	1/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 26	CTRL6697057	2/28/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 27	CTRL6787725	3/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 28	CTRL6913461	4/30/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 29	CTRL7035473	5/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 30	CTRL7129417	6/30/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 31	CTRL7261647	7/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 32	CTRL7451967	9/30/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 33	CTRL7544124	10/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 34	CTRL8013296	11/30/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 35	CTRL8296283	12/31/15	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 36	CTRL7803643	1/31/16	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 37	CTRL7814081	2/29/16	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 38	CTRL7882101	3/31/16	Platinum Partners Value Arbitrage Fund L.P. - VAM - Balance Sheet	
JX 39	CTRL4462245	12/31/212	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 40	CTRL4438343	1/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 41	CTRL4345664	2/28/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 42	CTRL44489275	3/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 43	CTRL4463621	4/30/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 44	CTRL4812127	5/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 45	CTRL4622142	6/30/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 46	CTRL4723432	7/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 47	CTRL4785969	8/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 48	CTRL4617142	9/30/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 49	CTRL4825023	10/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 50	CTRL4814546	11/30/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 51	CTRL6323770	12/31/13	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 52	CTRL6258192	1/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 53	CTRL6051264	2/28/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 54	CTRL6156908	3/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 55	CTRL6208302	6/30/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 56	CTRL5673884	8/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 57	CTRL5798445	9/30/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 58	CTRL5911196	10/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 59	CTRL6448235	11/30/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 60	CTRL6697309	1/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 61	CTRL6697131	2/28/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 62	CTRL6787881	3/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 63	CTRL6883418	4/30/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 64	CTRL7035640	5/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 65	CTRL7261363	7/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 66	CTRL7327225	8/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 67	CTRL7451918	9/30/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 68	CTRL7544233	10/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 69	CTRL8013582	11/30/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 70	CTRL8282693	12/31/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships	
JX 71	CTRL6079964	2/3/14	Email from Mark Nordlicht to Joe SanFilippo, dated February 3, 2014	From: Nordlicht To: SanFilippo
JX 72	CTRL7360002	9/22/15	Re: Examinations of Platinum Management (NY) LLC (801-72514) and the following relying Advisers: Platinum Credit Management L.P., Platinum Liquid Opportunity Management (NY) LLC, Bayberry CF Management LLC and PPBE Management NY LLC (collectively, the "Advisers")	From: SEC To: Platinum
JX 73	CTRL7751286	3/18/16	March 18, 2016 7:32 PM email from I. Neuberger to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, T. Wood, and M. Katz, Subject: #24958278v1_DB1_ - Release - Platinum Management Partners (CMP 3.18) + Attachment	From: Neuberger To: Ottensoser, Horowitz, Werblowsky, Levy CC: Katz, Wood
JX 74	CTRL7991698	3/20/16	Release Agreement among, among others, Platinum Management (NY) LLC, Mark Nordlicht, as Trustee of The Mark Nordlicht Grantor Trust, Murray Huberfeld, David Bodner, and Bernard Fuchs	From: Dan Grabon (the collective) To: Gerszberg, Manela, Steinberg

EXHIBIT B

JOL's Unique Exhibits from Exhibit A

Bodner's Note: 401, 403, 802 numbers refer to Federal Rules of Evidence. FRCP 56 / Rule 56 refers to topics dismissed at summary judgment. FRCP / Rule 26 refers to documents that weren't produced.

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
I. Platinum Management and PPVA Foundational and Registration Documents					
PX 1	CTRL8895822	7/1/08	Second Amended and Restated Limited Partnership Agreement of Platinum Partners Value Arbitrage Fund		
PX 2	CTRL7881623	Effective 1/1/2011	Amended and Restated Limited Partnership Agreement of Platinum Partners Value Arbitrage, LP		
PX 3	CTRL6254672	3/9/07	Certificate of Formation of Platinum Partners Value Arbitrage, LP		
PX 4	CTRL4598376	2/26/02	Certificate of Amendment of Platinum Management (NY) LLC		
PX 5	CTRL3220880	8/1/01	Certificate of Formation of Platinum Management (NY) LLC		
PX 6	CTRL8867343	3/9/07	Third Amended and Restated Limited Partnership Agreement for Platinum Partners Value Arbitrage Fund (USA) LP		
PX 7	CTRL0735495	4/9/10	Certificate of Incorporation of Platinum Partners Value Arbitrage Intermediate Fund Ltd		
PX 8	CTRL3197937	4/9/10	Memorandum of Association of Platinum Partners Value Arbitrage Intermediate Fund Ltd		
PX 9	CTRL3135514	2/22/06	Amended and Restated Articles of Association of Platinum Partners Value Arbitrage Fund (International) Limited		
PX 10	CTRL0662696	12/17/02	Certificate of Registration of Exempted Limited Partnership of Platinum Partners Value Arbitrage Fund LP		
PX 11	PPVA_RH_0035774	12/17/02	Statement in Terms of Section 9 of the Exempted Partnership Law (2001 Revision) of Platinum Partners Value Arbitrage Fund LP		Object to fax header
PX 12	PPVA_RH_0035773	12/31/02	Statement in Terms of Section 10 of the Exempted Partnership Law (2001 Revision) of Platinum Partners Value Arbitrage Fund LP		
PX 13	PPVA_RH_0035772	3/27/03	Statement in Terms of Section 10 of the Exempted Partnership Law (2001 Revision) of Platinum Partners Value Arbitrage Fund LP		
PX 14	CTRL8867336	7/25/03	Certificate of Registration of Platinum Partners Value Arbitrage Fund (International) Limited		
PX 15	CTRL8867337	2/26/02	Certificate of Amendment of Name Change of Platinum Management LLC to Platinum Management (NY) LLC		
PX 16	CTRL8867342	12/12/02	Certificate of Amendment of Name Change of Platinum Partners Value Fund LP to Platinum Partners Value Arbitrage Fund (USA) LP		
PX 17	CTRL8867339	5/18/07	Platinum Partners Value Arbitrage Fund (International) Limited Confidential Private Offering Memorandum		
PX 18	CTRL8126385	Undated	Sample of Subscription Agreement for Limited Partnership Interests in Platinum Partners Value Arbitrage Fund (USA) LP		
PX 19	CTRL4938125	8/23/07	Certificate of Formation of Grosser Lane Management LLC		
PX 20	BW-SHIP-00655896	12/31/12	Assignment of Interests in Mark Nordlicht Grantor Trust		
PX 21	CTRL5825428	11/1/08	Nordlicht Management III Operating Agreement		
PX 22	CTRL6400166	4/11/2006 4/11/2006 1/7/2013 1/7/2013 1/8/2013 1/9/2013	Limited Liability Company Agreement of Monsey Equities LLC Articles of Organization of Monsey Equities LLC Appointment of Managing Member of Monsey Equities LLC Resignation of Manager of Monsey Equities LLC Declination to Serve as Successor Manager of Monsey Equities LLC Election of Manager of Monsey Equities LLC		
PX 23	CTRL8925128	4/17/12	Platinum Management (NY) LLC Form ADV		
PX 24	CTRL5131103	3/31/14	Platinum Management (NY) LLC Form ADV		
PX 25	CTRL6784889	3/31/15	Platinum Management (NY) LLC Form ADV		
PX 26	CTRL8772631	3/30/16	Draft of Platinum Management (NY) LLC Form ADV		
PX 27	n/a		Summary Exhibit of PPVA Master-Feeder Structure		Bodner reserves the right to object
PX 28	n/a		Summary Exhibit of Platinum Management (NY) LLC Ownership Structure		Bodner reserves the right to object
II. Beechwood Foundational Documents and Initial Financing Documents					
PX 29	AN001216	8/12/09	Operating Agreement of Montage Holdings LLC		401
PX 30	BW-SHIP-00655947	7/1/13	Operating Agreement of Lawrence Partners LLC		401
PX 31	BW-SHIP-00012967	11/11/13	Administrative Services Agreement between Beechwood Re and MSD Administrative Services LLC		401, FRCP 56 (Beechwood)
PX 32	BW-SHIP-00084579	12/30/13	Bylaws of Beechwood Re Holdings, Inc		401, FRCP 56 (Beechwood)
PX 33	BW-SHIP-00167404	11/30/13	Beechwood Re Investments LLC Demand Note to Beechwood Bermuda Limited		401, FRCP 56 (Beechwood)
PX 34	BW-SHIP-00655513	5/1/15	Consulting Agreement between MSD Administrative Services LLC, B Asset Manager LP, and Lawrence-Monsey Management LLC		401, FRCP 56 (Beechwood)
PX 35	CNOCSL_01715223	5/16/14	Beechwood Re Investments LLC Amended and Restated Demand Note to Beechwood Re Ltd		401, FRCP 56 (Beechwood)
PX 36	CNOCSL_00949252	11/21/13	Limited Partnership Agreement of B Asset Manager LP		401, FRCP 56 (Beechwood)
PX 37	CNOCSL_00949796	2/10/14	David I Levy Beechwood Trust		401, FRCP 56 (Beechwood)
PX 38	CNOCSL_01106124	3/1/16	Second Amended and Restated Limited Partnership Agreement of B Asset Manager LP		401, FRCP 56 (Beechwood)
PX 39	CNOCSL_01107539	1/29/14	Amended and Restated Certificate of Incorporation of Beechwood Re Holdings, Inc		401, FRCP 56 (Beechwood)
PX 40	CNOCSL_01107811	12/30/13	Amended and Restated Limited Liability Company Agreement for Beechwood Re Investments, LLC		401, FRCP 56 (Beechwood)
PX 41	CNOCSL_01108560	8/30/13	Beechwood Re Investments LLC Demand Note to Beechwood Re Ltd		401, FRCP 56 (Beechwood)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 42	CNOCSL_01303527	11/5/13	Limited Liability Company Agreement of MSD Administrative Services LLC		401, FRCP 56 (Beechwood)
PX 43	CTRL0741136	6/20/05	Articles of Incorporation and Limited Liability Agreement of White Star LLC		401, FRCP 56 (Beechwood)
PX 44	CTRL3128190	3/24/11	Limited Liability Company Agreement of DN Bodner Family LLC		401, FRCP 56 (Beechwood)
PX 45	CTRL3413571	11/23/13	Limited Liability Company Agreement of Road Holdings, LLC		401, FRCP 56 (Beechwood)
PX 46	CTRL5129709	11/20/13	Limited Liability Company Agreement of N Management LLC		401, FRCP 56 (Beechwood)
PX 47	CTRL6506410	11/21/13	Certificate of Limited Partnership of B Asset Manager LP		401, FRCP 56 (Beechwood)
PX 48	BW-SHIP-00101029	11/20/13	Certificate of Formation of B Asset Manager GP LLC		401, FRCP 56 (Beechwood)
PX 49	BW-SHIP-00101023	11/20/13	Limited Liability Company Agreement of B Asset Manager GP LLC		401, FRCP 56 (Beechwood)
PX 50	BW-SHIP-00009304	3/1/16	Amended and Restated Limited Partnership Agreement of B Asset Manager II, LP		401, FRCP 56 (Beechwood)
PX 51	CNOCSL_01105660	9/23/14	Certificate of Limited Partnership of B Asset Manager II, LP		401, FRCP 56 (Beechwood)
PX 52	BW-SHIP-01376529	9/23/14	Certificate of Formation of B Asset Manager II GP LLC		401, FRCP 56 (Beechwood)
PX 53	BW-SHIP-01376533	9/23/14	Limited Liability Company Agreement of BP Asset Manager II GP LLC		401, FRCP 56 (Beechwood)
PX 54	BW-SHIP-01467462	2/20/14	Limited Liability Company Agreement of BAM Administrative Services LLC		401, FRCP 56 (Beechwood)
PX 55	BW-SHIP-01467565	2/20/14	Certificate of Formation of BAM Administrative Services LLC		401, FRCP 56 (Beechwood)
PX 56	CTRL5129708	7/26/13	Certificate of Formation of Beechwood Re Investments LLC		401, FRCP 56 (Beechwood)
PX 57	CTRL5129707	9/9/13	Certificate of Amendment of Beechwood Re Investments LLC		401, FRCP 56 (Beechwood)
PX 58	CTRL5129709	11/20/13	Limited Liability Company Agreement of N Management LLC		401, FRCP 56 (Beechwood)
PX 59	CTRL5129710	11/20/13	Certificate of Formation of N Management LLC		401, FRCP 56 (Beechwood)
PX 60	BW-SHIP-01339308	2/11/14	Compilation of Trust Agreements for Beechwood Trusts		401, FRCP 56 (Beechwood)
PX 61	BW-SHIP-00084530	6/11/13	Beechwood Re Memorandum and Articles of Association		401, FRCP 56 (Beechwood)
PX 62	BW-SHIP-00084569	6/11/13	Beechwood Re Certificate of Incorporation		401, FRCP 56 (Beechwood)
PX 63	BW-SHIP-00084695	9/26/13	Certificate of Incorporation of Beechwood Bermuda Ltd		401, FRCP 56 (Beechwood)
PX 64	BW-SHIP-00084696	11/12/13	Certificate of Incorporation of Beechwood Bermuda Ltd Change of Name of Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 65	BW-SHIP-00084697	11/6/13	Bylaws of Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 66	BW-SHIP-00084727	10/9/13	Certificate of Incorporation of Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 67	BW-SHIP-00084728	11/12/13	Certificate of Incorporation of Beechwood Bermuda International Ltd Change of Name of Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 68	BW-SHIP-01371418	3/1/14	Amended and Restated By Laws of Beechwood Bermuda Ltd		401, FRCP 56 (Beechwood)
PX 69	BW-SHIP-01527384	11/5/13	Certificate of Formation of MSD Administrative Services LLC		401, FRCP 56 (Beechwood)
PX 70	BW-SHIP-00072778	1/16/14	Investment Management Agreement between B Asset Manager LP and Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 71	BW-SHIP-00072816	1/6/14	Register of Members of Beechwood Bermuda International Ltd		401, FRCP 56 (Beechwood)
PX 72	BW-SHIP-00072817	1/6/14	Register of Members of Beechwood Bermuda Ltd		401, FRCP 56 (Beechwood)
PX 73	CNOCSL_00035430	1/1/14	Register of Members of Beechwood Re Ltd		401, FRCP 56 (Beechwood)
PX 74	BW-SHIP-00167160	3/26/14	Second Amended and Restated Certificate of Incorporation of Beechwood Re Holdings		401, FRCP 56 (Beechwood)
PX 75	BW-SHIP-01503838	6/18/14	Second Amended and Restated Investment Management Agreement between B Asset Manager LP and Beechwood Re		401, FRCP 56 (Beechwood)
PX 76	CNOCSL00598859	1/14/15	Amendment No 1 to Second Amended and Restated Investment Management Agreement between B Asset Manager LP and Beechwood Re		401, FRCP 56 (Beechwood)
PX 77	CTRL6565813	11/24/13	Certificate of Formation of Road Holdings LLC		401, FRCP 56 (Beechwood)
PX 78	BW-SHIP-00252594		Chart of ownership in Beechwood Re Holdings		401, FRCP 56 (Beechwood)
PX 79	BW-SHIP-01091103		Listing of Beechwood Trust beneficiaries		401, FRCP 56 (Beechwood)
PX 80	BW-SHIP-00009699	1/15/15	Side Letter from Beechwood Re Investments, LLC to Senior Health Insurance Company of Pennsylvania		401, FRCP 56 (Beechwood)
PX 81	n/a		Summary Exhibit of Beechwood Corporate Structure		401, FRCP 56; Bodner reserves right to object
III. Black Elk Entities Foundational Documents					
PX 82	CTRL4694643	10/1/07	First Amended and Restated Operating Agreement of BEEEO		
PX 83	CTRL4493895	7/13/09	Second Amended and Restated Operating Agreement of BEEEO		
PX 84	CTRL7915213	1/29/08	Amended and Restated Limited Liability Company Operating Agreement of BEEEO		
PX 85	CTRL4493894	8/19/10	First Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 86	CTRL8961052	1/25/13	Third Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 87	CTRL5693220	4/29/13	Fifth Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 88	PPVA_RH_0410882	2/12/13	Fourth Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 89	CTRL4493896	5/31/11	Second Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 90	PPVA_RH_0410897	5/3/13	Sixth Amendment to Second Amended and Restated Operating Agreement of BEEEO		
PX 91	CTRL3680224	1/23/13	Operating Agreement of PPBE Holdings LLC		401, FRCP 56
PX 92	CTRL3680234	1/23/13	Operating Agreement of PPBE Management LLC		401, FRCP 56
PX 93	CTRL3755873	4/19/13	David Levy Grantor Trust #3 Agreement		401, FRCP 56
PX 94	CTRL3637543	1/23/13	Certificate of Formation of PPBE Holdings LLC		401, FRCP 56
PX 95	CTRL3637545	1/23/13	Certificate of Formation of PPBE Management LLC		401, FRCP 56 (BEOF)
PX 96	CTRL3637541	1/23/13	Certificate of Formation of Platinum Partners Black Elk Opportunities Fund LLC		401, FRCP 56 (BEOF)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 97	CTRL3679394	1/23/13	Management Agreement between Platinum Partners Black Elk Opportunities Fund and PPBE Management LLC		401, FRCP 56 (BEOF)
PX 98	CTRL3679380	1/23/13	Limited Liability Company Agreement of Platinum Partners Black Elk Opportunities Fund LLC		401, FRCP 56 (BEOF)
PX 99	CTRL3640011	1/24/13	Certificate of Incorporation of Platinum Partners Black Elk Opportunities Fund International Ltd		401, FRCP 56 (BEOF)
PX 100	CTRL3460012	1/24/13	Memorandum of Association of Platinum Partners Black Elk Opportunities Fund International Ltd		401, FRCP 56 (BEOF)
PX 101	CTRL3754698	11/15/10	Brian D Jedwab Grantor Trust		401, FRCP 56 (BEOF)
PX 102	CTRL3743086	1/31/13	Management Agreement between Platinum Partners Black Elk Opportunities Fund International Ltd and PPBE Management LLC		401, FRCP 56
PX 103	CTRL0882947	7/22/10	Certificate of Formation of PPVA Black Elk (Equity) LLC		401, FRCP 56
PX 104	CTRL0882948	7/22/10	Limited Liability Company Agreement of PPVA Black Elk (Equity) LLC		401, FRCP 56
PX 105	CTRL1812599	1/1/11	Amended and Restated Operating Agreement of PPVA Black Elk (Equity) LLC		401, FRCP 56
PX 106	CTRL6531503	3/6/15	First Amendment to Amended and Restated Operating Agreement of PPVA Oil and Gas LLC		
PX 107	CTRL0882949	7/22/10	Certificate of Formation of PPVA Black Elk (Investor) LLC		
PX 108	CTRL0882950	7/22/10	Limited Liability Company Agreement of PPVA Black Elk (Investor) LLC		
PX 109	CTRL0843058	6/19/09	Memorandum and Articles of Association of PPVA Black Elk (Cayman), Ltd		
PX 110	n/a		Summary Exhibit of Ownership and Management Structure for the BEOF Funds		401, FRCP 56; Bodner reserves right to object
IV. Black Elk Transaction Documents					
PX 111	CTRL7686272	11/23/10	Black Elk Indenture		401, FRCP 56
PX 112	CTRL7641446 CTRL7641447	8/12/14	Renaissance-Black Elk Purchase Agreement (parts 1 and 2)		
PX 113	CTRL5897214	2/20/14	Note issued by Black Elk Energy Offshore Operations LLC to Bre BCLIC Primary		401, FRCP 56
PX 114	CTRL5897215	2/20/14	Note issued by Black Elk Energy Offshore Operations LLC to Bre BCLIC Sub		401, FRCP 56
PX 115	CTRL5897216	2/20/14	Note issued by Black Elk Energy Offshore Operations LLC to Bre WNIC 2013 LTC Primary		401, FRCP 56
PX 116	CTRL5897217	2/20/14	Note issued by Black Elk Energy Offshore Operations LLC to Bre WNIC 2013 LTC Sub		401, FRCP 56
PX 117	CTRL5897153	12/24/10	Amended and Restated Second Lien Intercreditor Agreement		401, FRCP 56
PX 118	CTRL3316929	12/24/10	Intercreditor Agreement		401, FRCP 56
PX 119	CTRL5897158	12/24/10	Credit Agreement		401, FRCP 56
PX 120	CTRL4354803	5/31/11	First Amendment to Credit Agreement		401, FRCP 56
PX 121	CTRL6210239	7/16/14	Black Elk Consent Solicitation		401, FRCP 56
PX 122	CTRL5553260 CTRL5552914 CTRL5552915	7/5/05	PPBE/PPVA Class E and Class B Unit Transactions; PPBE International LLC Loan Facility (parts 1-3)		401, FRCP 56
PX 123	CTRL8663873	4/11/14	Purchase Agreement between PPVA, PPBE Onshore, other Platinum entities		401, FRCP 56
PX 124	CTRL8663874	4/11/14	Purchase Agreement between PPVA, PPBE Offshore, other Platinum entities		401, FRCP 56
PX 125	CTRL8663875	4/1/14	Purchase Agreement between PPVA, PPBE Onshore, other Platinum entities		401, FRCP 56
V. China Horizon and Yellow River Foundational and Transaction Documents					
PX 126	CTRL8326902	7/1/15	Promissory Note issued by China Horizon Investments Group		401, FRCP 56 (China Horizon)
PX 127	CTRL8326903	7/1/15	Demand Promissory Note issued by China Horizon Investments Group		401, FRCP 56 (China Horizon)
PX 128	CTRL8301848	1/1/16	Promissory Note issued by China Horizon Investments Group		401, FRCP 56 (China Horizon)
PX 129	CTRL8301849	1/1/16	Demand Promissory Note issued by China Horizon Investments Group		401, FRCP 56 (China Horizon)
PX 130	CTRL7826256	4/1/16	China Horizon Investments Group Limited Secured Promissory Note		401, FRCP 56 (China Horizon)
PX 131	CTRL7826527	4/12/16	China Horizon Investments Group Secured Promissory Note		401, FRCP 56 (China Horizon)
PX 132	CTRL7963933	2/18/16	China Horizon Investments Group Limited Secured Promissory Note		401, FRCP 56 (China Horizon)
PX 133	CTRL1804474	12/31/10	Series B Preferred Share Purchase Agreement between China Horizon Holdings Limited and Platinum Partners Value Arbitrage Fund LP		401, FRCP 56 (China Horizon)
PX 134	CTRL0723569	4/9/10	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 135	CTRL0777062	6/4/10	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 136	CTRL0715797	3/23/09	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 137	CTRL0824354	7/12/10	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 138	CTRL8900530	5/27/09	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 139	CTRL0600351	5/8/09	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 140	CTRL8902490	4/21/09	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 141	CTRL0855265	11/15/10	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 142	CTRL3071568	1/27/12	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 143	CTRL3209190	4/26/12	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 144	CTRL8961161	7/1/13	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 145	CTRL8961160	8/26/13	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 146	CTRL8967077	11/1/13	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 147	CTRL8961149	12/10/13	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 148	CTRL8966278	1/1/14	Demand Promissory Note		401, FRCP 56 (China Horizon)
PX 149	CTRL6081522	1/15/14	Promissory Note		401, FRCP 56 (China Horizon)
PX 150	CNOCSL_00611125	5/2/12	Memorandum of Association of China Horizon Investments Group Limited		401, FRCP 56 (China Horizon)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 151	CNOCSL_00611133 @				
PX 151	CNOCSL_00611124	5/2/12	Articles of Association of China Horizon Investments Group Limited		401, FRCP 56 (China Horizon)
PX 152	CTRL6847761	5/8/12	China Horizon Investments Group Limited Series C Preferred Share Purchase Agreement		401, Rule 56 (China Horizon)
PX 153	CTRL6847761	5/8/12	China Horizon Investments Group Limited Series C Preferred Share Purchase Agreement		401, Rule 56 (China Horizon)
PX 154	PPVA_RH_0622575	9/25/07	China Horizon Investments Limited Subscription Agreement		401, FRCP 56 (China Horizon)
PX 155	PPVA_RH_0622576	9/25/07	China Horizon Investments Limited Share Certificate		401, FRCP 56 (China Horizon)
PX 156	CTRL8902495	7/2/09	Letter from Platinum Partners Value Arbitrage Fund to China Horizon Holdings Limited		401, FRCP 56 (China Horizon)
PX 157	CTRL4714068	11/11/13	China Horizon Holdings Limited Share Certificate		401, FRCP 56 (China Horizon)
PX 158	CTRL8717857	On or about 9/2/2016	Principal Growth Strategies LLC Acceptance of Shares of Yellow River (Cayman) Limited		401, Rule 56 (China Horizon)
PX 159	CTRL8717857	On or about 9/2/2016	Principal Growth Strategies LLC Acceptance of Shares of Yellow River (Cayman) Limited		401, Rule 56 (China Horizon)
PX 160	CTRL8962966	6/9/16	Yellow River (Cayman) Ltd Subscription Agreement for Principal Growth Strategies		401, FRCP 56 (China Horizon)
PX 161	CTRL8962963	Undated	Yellow River (Cayman) Ltd Subscription Agreement for Platinum Partners Value Arbitrage Fund		401, FRCP 56 (China Horizon)
PX 162	CTRL8962961	Undated	Yellow River (Cayman) Ltd Subscription Agreement for Platinum Partners Value Arbitrage Fund		401, FRCP 56 (China Horizon)
PX 163	CTRL7833918	3/30/16	Articles of Association of Yellow River (Cayman) Limited		401, FRCP 56 (China Horizon)
VI. Northstar Foundational and Transaction Documents					
PX 164	CTRL6486272	5/5/11	Certificate of Formation of Northstar Offshore Group, LLC		
PX 165	CTRL6400989	2/13/12	Amended and Restated Limited Liability Company Agreement of Northstar Offshore Group, LLC		
PX 166	CTRL6486274	4/1/13	Amendment to Amended and Restated Limited Liability Company Agreement of Northstar Offshore Group, LLC		
PX 167	CTRL8962433	2/1/15	Second Amendment to Amended and Restated Limited Liability Company Agreement of Northstar Offshore Group, LLC		
PX 168	CTRL7087634	4/1/15	Fourth Amendment to Amended and Restated Limited Liability Company Agreement of Northstar Offshore Group LLC		
PX 169	CTRL7548305	8/21/14	Certificate of Conversion from a Corporation to a Limited Liability Company of Lafitte Energy		
PX 170	CTRL7730653	12/21/15	Certificate of Amendment of Northstar GOM Holdings Group LLC		
PX 171	CTRL4986082	9/7/14	Certificate of Good Standing of Northstar GOM Holdings Group LLC		
PX 172	CTRL6498611	9/17/14	Limited Liability Company Agreement of Northstar GOM Holdings LLC		
PX 173	CTRL8409835	1/9/15	Purchase and Sale Agreement by and between Black Elk Energy Offshore Operations, LLC and Northstar Offshore Group, LLC		401, FRCP 56
PX 174	CTRL5068507	7/16/14	Purchase and Sale Agreement between The Parties Listed in Appendix 2 and Lafitte Energy Corp		
PX 175	BW-SHIP-00503440	7/23/14	Amendment to Purchase and Sale Agreement between The Parties Listed in Appendix 2 and Lafitte Energy Corp		
PX 176	CNOCSL_00225301	8/11/14	Second Amendment to Purchase and Sale Agreement between The Parties Listed in Appendix 2 and Lafitte Energy Corp		
PX 177	CNOCSL_00088740	On or about 9/18/2014	Third Amendment to Purchase and Sale Agreement between The Parties Listed in Appendix 2 and Lafitte Energy Corp		
PX 178	CTRL8962150	4/1/15	Contribution Agreement between Platinum Partners Value Arbitrage Fund LP and Northstar Offshore Group, LLC, dated April 1, 2015		
PX 179	CTRL7623091	12/28/15	Delayed Draw Term Note from Northstar Offshore Group, LLC to GOM Holdings, LLC		
PX 180	CTRL5160549	6/25/14	Amended and Restated Delayed Draw Secured Term Note of dated June 25, 2014		
PX 181	CTRL5265139	9/18/14	Indenture for 12% Second Priority Senior Secured Notes due 2019		
PX 182	CNOCSL_00224779	9/16/14	Northstar GOM Holdings Group LLC Offering Circular		
PX 183	CTRL7548308	9/18/14	12% Second Priority Senior Secured Notes due September 18, 2019		
PX 184	CTRL6425385	9/16/14	Northstar GOM Holdings Group LLC Securities and Put Agreement between Northstar GOM Holdings Group LLC and Platinum Partners Value Arbitrage Fund LP		
PX 185	CTRL7961442	9/16/14	Securities Purchase Agreement among Northstar GOM Holdings Group LLC and the Schedule of Investors		
PX 186	BW-SHIP-00666542	9/18/14	Amended and Restated Fiscal Agency Agreement dated September 18, 2014		
PX 187	CTRL6723950	9/22/14	Assignment of Membership Interests		
PX 188	CTRL8962153	4/14/15	Exchange Agreement between Platinum Partners Value Arbitrage Fund LP and Northstar Offshore Group LLC		
PX 189	CTRL7467458	4/2/15	Master Participation Agreement between The First National Bank of Central Texas and Platinum Partners Value Arbitrage Fund LP and Platinum Partners Credit Opportunities Master Fund LP		401
PX 190	CTRL7467459	4/2/15	Loan Agreement between Northstar GOM Holdings Group LLC, Northstar Offshore Group LLC and the First National Bank of Central Texas		
PX 191	CTRL7243591	8/31/15	Security Agreement between PPVA and Heartland Bank		
VII. PEDEVCO Transaction Documents					
PX 192	CTRL8752536	5/12/16	Amended and Restated Secured Promissory Note issued by PEDEVCO Corp to RJ Credit LLC		401, FRCP 56 (damages period)
PX 193	CTRL8752550	5/12/16	Senior Secured Promissory Note issued by PEDEVCO Corp to RJ Credit LLC		401, FRCP 56
PX 194	CTRL6439089	4/10/14	Note and Security Agreement between RJ Resources Corp and RJ Credit LLC		
PX 195	CTRL8771363	2/23/15	Amendment to Note and Security Agreement between RJ Credit LLC and PEDEVCO Corp		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 196	CTRL8773160	2/23/15	Assumption and Consent Agreement among, RJ Credit LLC, RJ Resources Corp and PEDEVCO Corp		
PX 197	CTRL8752538	5/12/16	Amendment No 2 to Note and Security Agreement between RJ Credit LLC and PEDEVCO Corp		401, FRCP 56
PX 198	CNOCSL_00772247	5/12/16	Amended and Restated Note Purchase Agreement		401, FRCP 56
PX 199	CTRL8752534	5/12/16	Amended and Restated Secured Promissory Note issued by PEDEVCO Corp to BRe WNIC 2013 LTC Primary		401, FRCP 56
PX 200	BW-SHIP-00162453	5/12/16	Amended and Restated Secured Promissory Note issued by PEDEVCO Corp to BRe WNIC 2013 LTC Sub		401, FRCP 56
PX 201	CNOCSL_00605309	5/12/16	Amended and Restated Secured Promissory Note issued by PEDEVCO Corp to BRe BCLIC Sub		401, FRCP 56
PX 202	CNOCSL_00605324	5/12/16	Amended and Restated Secured Promissory Note issued by PEDEVCO Corp to Senior Health Insurance Company of Pennsylvania		401, FRCP 56
PX 203	CNOCSL_00679207	11/29/16	Elevation Assignment Agreement between BRe BCLIC Sub and Beechwood OMNIA Ltd		401, FRCP 26, FRCP 56
PX 204	CNOCSL_00679193	11/29/16	Elevation Assignment Agreement between BRe WNIC 2013 LTC Primary and Beechwood OMNIA Ltd		401, FRCP 26, FRCP 56
PX 205	CNOCSL_00679179	11/29/16	Elevation Assignment Agreement between BRe WNIC 2013 LTC Sub and Beechwood OMNIA Ltd		401, FRCP 26, FRCP 56
PX 206	SHIP0050503	1/26/17	Contribution Agreement among AGH Parent LLC, BBIL ULICO 2014, Beechwood Bermuda International Ltd and Beechwood OMNIA Ltd		401, FRCP 26, FRCP 56
PX 207	SHIP0050492	1/26/17	Letter from AGH Parent LLC to Principal Growth Strategies LLC		401, FRCP 26, Rule 56 (Agera)
PX 208	SHIP0050497	1/26/17	Assignment		401, FRCP 26, FRCP 56
PX 209	CTRL7286379	9/10/15	PEDEVCO Corp Warrant for the Purchase of Common Stock		
PX 210	CTRL7286740	9/10/15	PEDEVCO Corp Warrant for the Purchase of Common Stock		
PX 211	CTRL7286741	9/10/15	PEDEVCO Corp Warrant for the Purchase of Common Stock		
PX 212	CTRL7286742	9/10/15	PEDEVCO Corp Warrant for the Purchase of Common Stock		
PX 213	CTRL6835256	2/24/15	PEDEVCO Corp Common Stock Certificate to Golden Globe Energy (US), LLC		
PX 214	CTRL6564159	2/24/15	PEDEVCO Corp Preferred Stock Certificate to Golden Globe Energy (US), LLC		
VIII. Golden Gate Oil Foundational and Transaction Documents					
PX 215	CTRL6120633	5/13/14	Certificate of change of name from RJ Resources Corp to Golden Globe Energy Corp and Amended and Restated Certificate of Incorporation of RJ Resources Corp		
PX 216	CTRL4995081	2/26/14	Second Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil to Precious Capital LLC		
PX 217	CTRL8328949	11/7/14	Fourth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Precious Capital		
PX 218	CTRL8328950	11/7/14	Fourth Amendment to NPA between Golden Gate Oil LLC and Precious Capital LLC		
PX 219	CTRL8368169	11/7/14	Fourth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRe BCLIC Primary		401, FRCP 56
PX 220	CTRL8368170	11/7/14	Fourth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRe BCLIC Sub		401, FRCP 56
PX 221	CTRL8368172	11/7/14	Fourth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRe WNIC 2013 LTC Primary		401, FRCP 56
PX 222	CTRL8368173	11/7/14	Fourth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRe WNIC 2013 LTC Sub		401, FRCP 56
PX 223	CTRL8328951	11/7/14	Second Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Precious Capital LLC		
PX 224	CTRL8368175	11/17/15	Omnibus Amendment to Senior Secured Promissory Notes		
PX 225	CTRL8281147	1/13/16	Side Letter authored by Mark Nordlicht and Witnessed by Mark Feuer		
PX 226	BW-SHIP-00175498	3/21/16	Fifth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRe BCLIC Sub		401, FRCP 56
PX 227	CTRL7961438	3/21/16	Fifth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRE WNIC 2013 LTC Primary		401, FRCP 56
PX 228	BW-SHIP-00175530	3/21/16	Fifth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to BRE WNIC 2013 LTC Sub		401, FRCP 56
PX 229	BW-SHIP-00004699	3/21/16	Fifth Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Senior Health Insurance Company of Pennsylvania		401, FRCP 56
PX 230	CTRL7782151	3/21/16	Sixth Amended Note Purchase Agreement among Golden Gate Oil LLC, Precious Capital LLC and BAM Administrative Services LLC		401, FRCP 56
PX 231	CTRL7781553	3/21/16	Second Omnibus Amendment between Montsant Partners LLC and BAM Administrative Services LLC		401, FRCP 56 (Montsant)
PX 232	CTRL8126782	3/21/16	Master Guaranty		401, FRCP 56 (Montsant)
PX 233	CTRL8126784	3/21/16	Second Amended and Restated Secured Term Note issued by Montsant Partners LLC and Senior Health Insurance Company of Pennsylvania		401, FRCP 56 (Montsant)
PX 234	BW-SHIP-00175457	3/21/16	Collateral Assignment between Platinum Partners Value Arbitrage Fund LP and BAM Administrative Services LLC		401, FRCP 56 (Montsant)
PX 235	CTRL7837138	3/28/16	Promissory Note issued by Montsant Partners LLC to BBIL ULICO 2014		401, FRCP 56 (Montsant)
PX 236	CTRL5027292	10/29/13	First Amendment to Amended and Restated Operating Agreement of Golden Gate Oil LLC		
PX 237	CTRL3541358	4/10/12	Amended and Restated Operating Agreement of Golden Gate Oil LLC		
PX 238	CTRL3541359	4/10/12	Contribution Agreement between Golden Gate Oil LLC and Amrich Energy Inc		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 239	CTRL3541934	4/10/12	Note Purchase Agreement between Golden Gate Oil LLC and Precious Capital LLC		
PX 240	CTRL3541935	4/10/12	\$25,000,000 Promissory Note issued by Golden Gate Oil LLC to Precious Capital LLC		
PX 241	CTRL3541936	4/10/12	Security Agreement between Golden Gate Oil LLC and Precious Capital LLC		
PX 242	CTRL3541951	4/10/12	Contract Operating Agreement between AmRich Energy, Inc and Golden Gate Oil LLC		
PX 243	CTRL5081912	10/29/13	\$25,000,000 Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil to Precious Capital LLC		
PX 244	CTRL4711918	10/29/13	Amended and Restated Contract Operating Agreement between AmRich Energy, Inc and Golden Gate Oil LLC		
PX 245	CTRL5107144	10/29/13	First Omnibus Amended to Note Purchase Agreement and Senior Secured Promissory Note		
PX 246	CTRL5217517	7/2014	Omnibus Amendment to Secured Term Notes between Golden Gate Oil LLC and Investors		
PX 247	CTRL6609329	3/19/12	Certificate of Formation of Golden Gate Oil LLC		
PX 248	CTRL3541560	4/3/12	Operating Agreement of Golden Gate Oil LLC		
PX 249	CTRL3104460	3/26/12	Certificate of Formation of Precious Capital LLC		
PX 250	CTRL8689973	3/26/12	Amended and Restated Operating Agreement of Precious Capital LLC		
PX 251	CTRL5136004	4/10/12	Deed of Trust, Assignment, Security Agreement, Fixture Filing and Financing Statement to Precious Capital		
PX 252	CTRL4919840	8/14/14	Purchase Agreement among Precious Capital LLC, the Purchasers and Golden Gate Oil LLC		
PX 253	CTRL4739759	6/25/13	Indicative & Confidential Term Sheet between Black Elk Energy Offshore Operations LLC and Golden Gate Oil LLC		
PX 254	CTRL5107146	2/26/14	Second Amendment to NPA between Precious Capital and Golden Gate Oil LLC		
PX 255	CTRL5920855	2/26/14	Note Sale Agreement among Precious Capital LLC, BAM Administrative Services LLC, and Platinum Partners Value Arbitrage Fund LP		401, FRCP 56
PX 256	CTRL5136111	2/26/14	Second Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Bre WNIC 2013 LTC Sub		401, FRCP 56
PX 257	CTRL4995082	3/26/14	Third Amendment to NPA between Precious Capital LLC and Golden Gate Oil LLC		
PX 258	CTRL8340226	6/30/14	First Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Precious Capital LLC		
PX 259	CTRL8340228	6/30/14	Third Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Precious Capital LLC		
PX 260	CTRL5217328	6/30/14	Third Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Bre BCLIC Primary		401, FRCP 56
PX 261	CTRL5217329	6/30/14	Third Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Bre BCLIC Sub		401, FRCP 56
PX 262	CTRL5217331	6/30/14	Third Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Bre WNIC 2013 LTC Primary		401, FRCP 56
PX 263	CTRL5217332	6/30/14	Third Amended and Restated Senior Secured Promissory Note issued by Golden Gate Oil LLC to Bre WNIC 2013 LTC Sub		401, FRCP 56
IX. DMRJ/Montsant/Implant Sciences -- Foundational and Transaction Documents					
PX 264	CTRL6859009	8/20/08	Certificate of Formation of DMRJ Group LLC		401, FRCP 56
PX 265	CTRL0630598	8/20/08	Operating Agreement of DMRJ Group LLC		401, FRCP 56
PX 266	CTRL2045385	1/1/11	Amended and Restated Operating Agreement of DMRJ Group LLC		401, FRCP 56
PX 267	CTRL3124293	8/20/08	Certificate of Formation of DMRJ Group I LLC		401, FRCP 56
PX 268	CTRL1901631	8/20/08	Operating Agreement of DMRJ Group I LLC		401, FRCP 56
PX 269	BW-SHIP-00175562	3/21/16	Golden Gate Oil Modification of Deed of Trust		401, FRCP 56
PX 270	CTRL6454619	9/17/13	Operating Agreement of Montsant Partners LLC		401, FRCP 56 (Montsant)
PX 271	CTRL4657958	9/17/13	Certificate of Formation of Montsant Partners LLC		401, FRCP 56 (Montsant)
PX 272	CTRL8309469	5/4/15	Assignment Agreement between DMRJ Group LLC and Montsant Partners LLC		401, FRCP 56 (Montsant)
PX 273	CTRL8309472	12/10/08	Note and Warrant Purchase Agreement between Implant Sciences Corporation and DMRJ Group LLC		401, FRCP 56
PX 274	CTRL8199849	3/12/09	Amended and Restated Senior Secured Convertible Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 275	CTRL8199857	7/1/09	First Amendment to Note and Warrant Purchase Agreement between Implant Sciences Corporation and DMRJ Group LLC		401, FRCP 56
PX 276	CTRL8240850	7/1/09	Senior Secured Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 277	CTRL8051192	9/4/09	Implant Sciences Corporation and DMRJ Group LLC Credit Agreement		401, FRCP 56
PX 278	CTRL8199840	1/12/10	Omnibus Waiver and First Amendment to Credit Agreement and Third Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 279	CTRL8199841	4/23/10	Second Amendment to Credit Agreement and Fourth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 280	CTRL8199842	4/23/10	Amended Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 281	CTRL8199846	9/30/10	Omnibus Third Amendment to Credit Agreement and Fifth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 282	CTRL8199847	3/30/11	Omnibus Fourth Amendment to Credit Agreement and Sixth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 283	CTRL8199851	4/7/11	Omnibus Fifth Amendment to Credit Agreement and Seventh Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 284	CTRL8060842	9/29/11	1Omnibus Sixth Amendment to Credit Agreement and Eighth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC 2Amended and Restated Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 285	CTRL8198856	2/21/12	Omnibus Eighth Amendment to Credit Agreement and Tenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 286	CTRL8116357	9/5/12	1Omnibus Ninth Amendment to Credit Agreement and Eleventh Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC 2Senior Secured Convertible Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 287	CTRL8051194	2/28/13	Senior Secured Convertible Promissory Note issued by Implant Sciences Corporation to DMRJ Group LLC		401, FRCP 56
PX 288	CTRL6439337	2/28/13	Omnibus Tenth Amendment to Credit Agreement and Twelfth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 289	CTRL8199850	11/14/13	Omnibus Eleventh Amendment to Credit Agreement and Thirteenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 290	CTRL8127547	3/19/14	Note Purchase Agreement between Implant Sciences Corporation, the Investors, and BAM Administrative Services LLC		401, FRCP 56
PX 291	CTRL8312362	3/19/14	Omnibus Twelfth Amendment to Credit Agreement and Fourteenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 292	CTRL8966387	3/19/15	Omnibus Thirteenth Amendment to Credit Agreement and Fifteenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, and DMRJ Group LLC		401, FRCP 56
PX 293	CTRL7786966	3/19/15	Consent and Omnibus Amendment to Secured Term Notes		401, FRCP 56
PX 294	CTRL7806464	3/30/16	Consent and Second Omnibus Amendment to Secured Term Notes		401, FRCP 56
PX 295	CTRL8123827	3/31/16	Omnibus Fourteenth Amendment to Credit Agreement and Sixteenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, DMRJ Group LLC and Montsant Partners LLC		401, FRCP 56
PX 296	CTRL8122592	6/30/16	Omnibus Fifteenth Amendment to Credit Agreement and Seventeenth Amendment to Note and Warrant Purchase Agreement among Implant Sciences Corporation, the Guarantors, DMRJ Group LLC and Montsant Partners LLC		401, FRCP 56
PX 297	CTRL8126787	1/30/15	Note Purchase Agreement between Montsant Partners LLC, BAM Administrative Services and the Investors		401, FRCP 56
PX 298	CTRL8126788	1/30/15	Unsecured Term Note issued by Montsant Partners LLC to Senior Health Insurance Company of Pennsylvania		401, FRCP 56
PX 299	CTRL7075261	1/30/15	Guaranty of Nordlicht and Kalter		401, FRCP 56
PX 300	CTRL7648017	1/30/15	Letter Agreement for Purchase of Black Elk Bonds		401, FRCP 56
PX 301	CTRL8126484	7/20/16	Implant Sciences Corporation Warrant to DMRJ Group		401, FRCP 56
X. Over Everything Foundational and Transaction Documents					
PX 302	CTRL6061875	9/17/13	Certificate of Formation of Atlantic Growth Capital LLC		401, FRCP 56
PX 303	CTRL7615463	9/17/13	Operating Agreement of Atlantic Growth Capital LLC		401, FRCP 56
PX 304	CTRL8134957	9/8/14	Second Amended and Restated Operating Agreement of Over Everything, LLC		401, FRCP 56 (Over Everything)
PX 305	CTRL5793365	9/22/09	Certificate of Formation of Suchman LLC		401, FRCP 56 (Over Everything)
PX 306	CTRL7332913	9/26/2013	Certificate of Formation of TC Top, LLC		401, FRCP 56 (Over Everything)
PX 307	CTRL8134961	12/13/2013	Certificate of Amendment to the Certificate of Formation of Over Everything, LLC		401, FRCP 56 (Over Everything)
PX 308	CTRL8134956	9/8/14	Second Amended and Restated Operating Agreement of Suchman LLC		401, FRCP 56 (Over Everything)
PX 309	CTRL8962242	9/8/14	Loan Agreement among, among others, Suchman LLC, Over Everything LLC, and Atlantic Growth Capital LLC		401, FRCP 56 (Over Everything)
PX 310	CTRL8588425	11/2014	Intercreditor Agreement among, among another, Atlantic Growth Capital LLC and Suchman, LLC		401, FRCP 56 (Over Everything)
PX 311	CTRL8134951	9/9/14	Amendment to Loan Agreement among, among others, Suchman LLC, Over Everything LLC, and Atlantic Growth Capital, LLC		401, FRCP 56 (Over Everything)
PX 312	CTRL8134959	9/9/14	\$30 million Promissory Note issued by Over Everything LLC to Atlantic Growth LLC		401, FRCP 56 (Over Everything)
PX 313	CTRL8685332	9/9/14	\$10 million Promissory Note issued by Over Everything LLC to Atlantic Growth LLC		401, FRCP 56 (Over Everything)
XI. Desert Hawk Foundational and Transaction Documents					
PX 313	CTRL8685332	2/28/10	Amended and Restated Articles of Incorporation of Desert Hawk Gold Corp		
PX 314	CTRL7268379	7/14/10	Certificate of Designation of Series A Preferred Stock of Desert Hawk Gold Corp		
PX 315	CTRL6855685	7/14/10	Desert Hawk Gold Corp Promissory Note due July 14, 2012		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 316	CTRL6438132	7/14/10	Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 317	CTRL4543869	7/14/10	Security Agreement among Desert Hawk Gold Corp, DMRJ Group I LLC and Blue Fin Capital Inc		401, FRCP 56
PX 318	CTRL0662877	11/8/10	Amendment and Waiver to the Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 319	CTRL1864930	2/25/11	Second Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 320	CTRL1836349	3/11/11	Third Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 321	CTRL8685319	4/21/11	Certificate of Designations, Preferences, and Rights of Series A-1 and A-2 Convertible Preferred Stock of Desert Hawk Gold Corp		
PX 322	CTRL8685320	5/3/11	Amendment to Certificate of Designations, Preferences, and Rights of Series A-1 and A-2 Convertible Preferred Stock of Desert Hawk Gold Corp		
PX 323	CTRL3519022	5/3/11	Amended and Restated Bylaws of Desert Hawk Gold Corp		
PX 324	CTRL3382419	5/3/11	Fourth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 325	CTRL7245773	10/16/12	Fifth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 326	CTRL4344999	1/29/13	Sixth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 327	CTRL4464062	4/30/13	Seventh Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 328	CTRL4967518	7/24/13	Eighth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 329	CTRL5024966	10/24/13	Ninth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 330	CTRL7245769	2/19/14	Tenth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 331	CTRL8685322	2/20/14	Amendment to Certificate of Designation After Issuance of Class or Series of Series A Convertible Preferred Stock of Desert Hawk Gold Corp		
PX 332	CTRL8685323	2/20/14	Amendment to Certificate of Designation After Issuance of Class or Series of Series A-1 and Series A-2 Convertible Preferred Stock of Desert Hawk Gold Corp		
PX 333	CTRL8685323	2/20/14	Amendment to Certificate of Designation After Issuance of Class or Series of Series A-1 and Series A-2 Convertible Preferred Stock of Desert Hawk Gold Corp		
PX 334	CTRL6300459	2/19/14	Amended and Restated Promissory Note due October 31, 2016 issued by Desert Hawk Gold Corp to DMRJ Group I LLC		401, FRCP 56
PX 335	CTRL7245770	3/17/15	Eleventh Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 336	CTRL7593096	5/22/15	Participation Agreement (Desert Hawk Gold Corp) among DMRJ Group I LLC, PPVA, Creditor Parties, and BAM Administrative Services LLC		401, FRCP 56
PX 337	CTRL7289329	5/22/15	Participation Agreement (Desert Hawk Gold Corp) among DMRJ Group I LLC, PPVA, Creditor Parties, and Beechwood Bermuda International Limited		401, FRCP 56
PX 338	CTRL7289330	5/22/15	Participation Agreement (Desert Hawk Gold Corp) among DMRJ Group I LLC, PPVA, Creditor Parties, and Beechwood Re Ltd		401, FRCP 56
PX 339	CTRL7289331	5/22/15	Put Agreement between Platinum Partners Value Arbitrage Fund and BAM Administrative Services		401, FRCP 56
PX 340	CTRL7289332	5/22/15	Put Agreement among Platinum Partners Value Arbitrage Fund, Beechwood Bermuda International Limited, and Beechwood Re Limited		401, FRCP 56
PX 341	CTRL8967171	6/5/15	Twelfth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 342	CTRL7877704	9/10/15	Thirteenth Amendment to Investment Agreement between Desert Hawk Gold Corp and DMRJ Group I LLC		401, FRCP 56
PX 343	CTRL7616325	12/23/15	Assignment Agreement between Beechwood Bermuda International Limited and Platinum Partners Credit Opportunities Master Fund, LP		401, Rule 56 (Agera)
PX 344	CTRL7616326	12/23/15	Assignment Agreement between Beechwood Bermuda International Limited and Platinum Partners Credit Opportunities Master Fund, LP		401, Rule 56 (Agera)
PX 345	CTRL7616326	12/23/15	Assignment Agreement between Beechwood Bermuda International Limited and Platinum Partners Credit Opportunities Master Fund, LP		401, Rule 56 (Agera)
XII. Agera Foundational and Transaction Documents					
PX 346	CTRL8558745	12/4/14	Operating Agreement of Principal Growth Strategies LLC		401, FRCP 56 (Agera)
PX 347	CTRL8126766	6/8/16	First Amendment to Operating Agreement of Principal Growth Strategies LLC		401, FRCP 56 (Agera)
PX 348	CTRL8105690	6/9/16	Agera Holdings LLC, Second Amended and Restated Secured Convertible Promissory Note		401, FRCP 56 (Agera)
PX 349	CTRL8126731	6/9/16	Assignment Agreement among AGH Parent LLC and the persons listed on Schedule 1 attached hereto		401, FRCP 56 (Agera)
PX 350	CTRL8126734	6/9/16	Note Purchase Agreement (B-1) among BAM Administrative Services LLC, The Investors, and AGH Parent LLC		401, FRCP 56 (Agera)
PX 351	CTRL8126736	6/9/16	Assignment of Secured Convertible Promissory Note, among, among others, BBIL ULICO 2014 and Principal Growth Strategies, LLC		401, FRCP 56 (Agera)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 352	CTRL8126737	6/9/16	Assignment of Secured Convertible Promissory Note between Principal Growth Strategies LLC and AGH Parent LLC		401, FRCP 56 (Agera)
PX 353	CTRL8126738	6/9/16	Amendment and Assumption Agreement among Agera Energy LLC, Agera Holdings, LLC, and Principal Growth Strategies, LLC		401, FRCP 56 (Agera)
PX 354	CNOCSL_00098497	6/9/16	Subscription Agreement between AGH Parent, LLC and Beechwood Re Investments, LLC		401, FRCP 56 (Agera)
PX 355	CTRL8126739	6/9/16	Agera Holdings LLC, Amended and Restated Secured Note Purchase Agreement		401, FRCP 56 (Agera)
PX 356	CTRL8126740	6/9/16	Agera Holdings LLC, Second Amended and Restated Secured Convertible Promissory Note		401, FRCP 56 (Agera)
PX 357	CTRL8126755	6/9/16	Second Amended and Restated Limited Liability Company Agreement of Agera Holdings, LLC		401, FRCP 56 (Agera)
PX 358	CTRL8126757	6/9/16	Funding Direction Letter from Principal Growth Strategies LLC to AGH Parent LLC and others		401, FRCP 56 (Agera)
PX 359	CTRL8126759	6/9/16	Purchase Agreement between AGH Parent LLC and Principal Growth Strategies LLC		401, FRCP 56 (Agera)
PX 360	CTRL8126760	6/9/16	Assignment and Assumption Agreement between AGH Parent LLC and Principal Growth Strategies LLC		401, FRCP 56 (Agera)
PX 361	CTRL8126762	6/9/16	Amended and Restated Limited Liability Company Agreement among AGH Parent LLC and the Members Named Herein		401, FRCP 56 (Agera)
PX 362	CTRL8126765	6/9/16	Flow of Funds Memorandum between AGH Parent LLC and Principal Growth Strategies LLC		401, FRCP 56 (Agera)
PX 363	SHIP0050492	1/26/17	Letter from AGH Parent LLC to Principal Growth Strategies LLC		401, FRCP 56 (Agera)
XIII. Exhibits Concerning March 2016 Release					
PX 364	CTRL8323807	3/10/16	From: Nordlicht To: Landesman CC: Werblowsky BCC: Fuchs	Atty client privilege	
PX 365	CTRL8335881	3/15/16	From: Katz To: Nordlicht	Release doc	
PX 366	CTRL8335477	3/15/16	From: Nordlicht To: Katz	RE: Release doc	
PX 367	CTRL8339805	3/17/16	From: Nordlicht To: Levy	RE: RE:	401, 403 (objection is to top 2 emails)
PX 368	CTRL8338328	3/17/16	From: Nordlicht To: Huberfeld CC: Muller BCC: Levy	Maggie- please print out and send to bodner tomorrow	
PX 369	CTRL7749421-22	3/18/16	From: Neuberger To: Werblowsky, Levy CC: Katz	Release - Platinum Management Partners	
PX 370	CTRL7749843	3/18/16	RE: Katz, Bodner and Huberfeld release	From: Nordlicht To: Hertzberg, Levy	802 objection to top email. 106 - acceptable if follow-up emails (CTRL7750183) also come in
PX 371	CTRL7772338	3/27/16	From: Nordlicht To: Katz	RE: Trip	106 - acceptable if 3.27.16 Nordlicht to Katz email (CTRL7772355) also comes in. If not, 401, 802
PX 372	CTRL7814401-03	4/11/16	From: Morales To: Nordlicht Attachment -- From: Marcos Katz To: Huberfeld, Bodner, Nordlicht	Urgent	403, 802
XIV. Exhibits Concerning Bodner's Role at Platinum and Beechwood					
PX 373	CTRL4919566	8/21/14	From: Nordlicht To: Jedwab	Re: Transactions	401, 802, FRCP 56
PX 374	CTRL3184919	1/25/12	From: Steinberg To: Nordlicht	Re: Black Elk	401 (damages period), 802
PX 375	CTRL5097898	2/11/14	From: Steinberg To: Nordlicht CC: Beren	RE: Final Ryder Scott Report	802
PX 376	CTRL4336049	7/4/13	From: Landesman To: Fuchs CC: Albanese	Fw: PPVA Prelim Estimate	
PX 377	CTRL3702982	4/29/13	From: Albanese To: Nordlicht; Lau	reminder from David Bodner	
PX 378	CTRL7884645	5/2/16	From: Fuchs To: Nordlicht	Fwd: PPNE Redemption update	
PX 379	CTRL6309069	6/16/14	From: Nordlicht To: Landesman BCC: Huberfeld	Re: Prospects	802
PX 380	CTRL7128044	7/30/15	From: Bodner To: Albanese	Re: re beechwoods	401, 403
PX 381	BW-SHIP-00919315	3/20/13	From: Huberfeld To: Feuer	Pls review	401, FRCP 56 (Beechwood)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 382	CTRL3748840	8/28/13	From: Huberfeld To: Albanese	Fw:Fwd: Pls review	401, FRCP 56 (Beechwood)
PX 383	CTRL4456678-79	5/30/13	From: Levy To: Nordlicht	Term-Sheet Beechwood	401, FRCP 56 (Beechwood)
PX 384	BW-SHIP-00975449	4/7/14	From: Feit To: Manela	RE: Puerto Rico limits	401, FRCP 56 (Beechwood)
PX 385	BW-SHIP-00835424-425	6/17/16	From: Taylor To: Edelstein	Come talk to me about this tomorrow I made changes, but I need you to do one more thing	401, FRCP 56 (Beechwood)
PX 386	BW-SHIP-00454912	5/27/14	From: Northwood To: Levy	Re: To do list	401, FRCP 56 (Beechwood)
PX 387	CTRL5104415	7/1/14	From: Northwood To: Muller, Albanese, others	FYI- Beechwood/PPCO for Mark	401, FRCP 56 (Beechwood)
PX 388	CTRL6214675	8/12/14	From: Nordlicht To: Marzella CC: Slota, Levy, Ottensoser, others	Atty client privilege	401, FRCP 56 (Beechwood)
PX 389	CTRL5717681	10/21/14	From: Slota To: Albanese	Re: TV in Davids Office	401
PX 390	ALB0000774	2/19/15	From: bodnerang@gmailcom	Re: Monday February 9th 12 pm	401
PX 391	CTRL5810496	11/11/14	To: "sol lax"	FW: Re:IntercontinentalExchange NYSE Euronext Request for Professional Subscriber Agreement - 768658002	401
PX 392	CTRL3142444	3/12/12	From: Albanese To: Kourouma	Created: Bodner keyboard not working (speakers)	401
PX 393	CTRL7886517	5/3/16	From: Albanese To: Platinum Help Desk	Re:	
PX 394	CTRL5164887	1/16/14	From: Nordlicht To: Gerszberg	RE: Contact info	802
PX 395	CTRL6416156	1/2/15	From: Albanese To: Cruz	Re: Getting Started	401
PX 396	BW-SHIP-00274993	11/24/14	From: Mandelbaum To: Bertram	RE: Black Elk Agreement	401, 802, FRCP 56
PX 397	CTRL5967734	12/18/14	From: Feuer To: Taylor	Fwd: Golden Gate	802
PX 398	BW-SHIP-00727696	10/21/14	From: Feuer To: Nordlicht, Manela	Fwd: Interest Invoices	802
PX 399	CTRL6529814	3/12/15	From: Feuer To: Nordlicht		401, FRCP 56
PX 400	CTRL6671569	4/8/15	From: Feuer To: Nordlicht		401, FRCP 56
PX 401	BW-SHIP-00916101-104	9/21/15	From: Nordlicht To: Huberfeld	Fwd: Desert Hawk/Payment Due	401, 802
PX 402	CTRL3695379	4/18/13	From: Feuer To: Huberfeld	partner meeting- from david bodner	
PX 403	CTRL2347188	7/23/12	From: Albanese To: Nordlicht, Landesman CC: Huberfeld, others	2:00 pm Ezra Beren & David Bodner (learning)	
PX 404	CNOCSL_01191461		Levy letter re: Beechwood investments into Platinum		
PX 405	CTRL5883850	11/10/14	From: Albanese To: Friedmans	RE: Meeting with Mr Bodner	401, 802, FRCP 56
PX 406	CTRL5178784	5/13/14	From: Albanese To: Bodner personal email	Fw: Blended position limits	401
PX 407	CTRL7891159	5/4/16	From: Fuchs To: Nordlicht	Re: RE:	
PX 408	CTRL7126437	7/29/15	From: Fuchs To: Kuppermann	Re: PPVA	401, 802
PX 409	CTRL7499889	11/15/15	From: Nordlicht To: Levy CC: Werblowsky	Re: Attorney client privilege	401
PX 410	PPVA_RH_0155845	6/13/16	From: Hertzberg To: Dechert	FW: Beechwood-Platinum transactions	401, 403 (also to attachment), 106 - Semmelman Decl. Ex. B (under-seal version) needs to come in too

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 411	CTRL8025008	6/9/16	From: Narain To: Steinberg, Thomas, others		401, 403, 802
PX 412	CTRL5734023	10/23/14	From: Beren To: Mayer CC: Steinberg	Re:	401
PX 413	CTRL5016500	9/16/14	From: Nordlicht To: Levy CC: Werblowsky	Atty client privilege	401, 803
PX 414	CTRL5096039	5/2/14	From: Steinberg To: Albanese CC: Beren, Huberfeld	Meeting w/ David B	401
PX 415	CTRL6385723	8/14/14	From: Baez To: Albanese	RE: David Bodner meet w/Mark	802
PX 416	CTRL2106638	4/11/11	From: Morales To: Nordlicht	Partner meeting for this Thursday @ SOLO?	401, 802
PX 417	CTRL3312593	11/16/12	From: Janczewski To: SanFilippo	Black Elk Investors	401, 802
PX 418	CTRL5172051	3/17/14	From: Albanese To: Feuer	Accepted: Weekly Touchbase Meeting	401
PX 419	CTRL5167622	2/6/14	From: Albanese To: Bodner personal email	FW: Angela - please print out for david thx	401
PX 420	CTRL5192799	6/18/14	From: Albanese To: Huberfeld, Nordlicht, others	RE: catch up meeting	401, FRCP 56 (Beechwood)
PX 421	CTRL5889601	11/26/14	From: Nordlicht To: Kalter	Re:	401, 802
PX 422	CTRL7922210	5/16/16	From Huberfeld To: Bodner, Nordlicht and Fuchs	Fwd: NEW TAIL N800WJ - David Bodner FXE-MMAA- TEB 05-16-2016 Hawker 800XP	403 (also for attachment)
PX 423	CTRL7920886	5/13/16	From: Levy To: Marcos Katz	Re: statement	
PX 424	CTRL8014947	1/15/16	From: Fuchs To: Nordlicht		401, 403, 802
PX 425	BODNER0000039	7/29/15	From: Albanese To: Bodner	(No Subject)	401, 403, 802
PX 426	CTRL0803329	5/11/10	From: Albanese To: Geysler	FW: Presentation & 1 Pager on shore & Of Shore Shore	401, 802
PX 427	CTRL3565032	7/12/12	From: Albanese To: Huberfeld, Harari	3:00 PM Meeting Fabrice Harari, & Murray Huberfeld, David Bodner	401
PX 428	CTRL3178598	4/2/12	From: Landesman To: Cammarota	Conversation #67193	401, 802
PX 429	CTRL3237721	6/7/12	From: Landesman To: Cammarota	Fw: Thank You	401, 802
PX 430	CTRL3308938	9/24/12	From: Albanese To: Lau, Trotter CC: Small	RE: Conf room	401, 802
PX 431	CTRL0545472	9/27/10	From: Landesman To: Nordlicht CC: Albanese, others	AUM	401, 402
PX 432	CTRL3347167	10/24/12	From: Albanese	1:30 Conference Call Fabrice Harari, Noah Berkowitz, David Bodner	401
PX 433	CTRL4526161	8/29/13	From: Clingman To: Sitt CC: Albanese	Post Mart	401, Rule 56 (China Horizon), 802
PX 434	CTRL3692863	8/29/13	From: Albanese To: Fuchs	RE: FW:	401, 802
PX 435	CTRL5171525	3/11/14	From: Albanese To: Bodner	Fw: Calls Duvid needs to make	401, 802
PX 436	CTRL5765730	10/29/14	From: Landesman To: Kalter	RE: still waiting on the client list	401, 802
PX 437	ALB0001068	4/13/15	From: Albanese To: Bodner	Fwd: 4/1 Subs - as of April 11, 2015	

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 438	CTRL7126437	7/29/15	From: Fuchs To: Kuppermann	Re: PPVA	401, 802
PX 439	CTRL7426352	10/20/15	From: Nordlicht To: Werblowsky	Re: atty client privilege	
PX 440	CTRL7736607	1/18/16	From: Muller To: Nordlicht	Re:	401, 802
PX 441	CTRL3199778	6/7/12	From: Albanese To: Muller CC: Landesman	RE: Reconnecting	401, 802
PX 442	CTRL3594079	10/22/12	From: Albanese To: Haddad CC: Levy, Barber	FW: Investment valuations	401, 802
PX 443	CTRL4748634	8/19/13	From: Albanese To: Steinberg	RE: Dstrux Inc	401, 802
PX 444	CTRL4581430	10/8/13	From: Levy To: Nordlicht	Re:	401, 802
PX 445	CTRL4667389	10/28/13	From: Albanese To: Steinberg	Accepted: Meeting w/ David Bodner - New Deal	401
PX 446	CTRL3708222	10/28/13	From: Albanese To: Bodner	Fw: Chinese regulations	401, 802
PX 447	CTRL4826852	10/31/13	From: Steinberg To: Clingman	Re: Traderoom	401, 802
PX 448	CTRL5167307	2/5/14	From: Albanese To: Steinberg	Re: David Bodner	401, 802
PX 449	CTRL5146112	2/10/14	From: Steinberg To: Beren	(No Subject)	401, 802
PX 450	CTRL5170928	3/5/14	From: Clingman To: Huberfeld, Albanese	Fw: DST	401, 802
PX 451	BW-SHIP-00480754	4/30/14	From: Propper To: Levy	No Subject	401, 802
PX 452	CTRL5020078	5/6/14	From: Greene To: Albanese	No Subject	401, 403, 802
PX 453	PPVA_RH_0362802	5/16/14	From: Albanese To: Mannis, Nordlicht, Huberfeld, Lau and Kim	SALT 1:00 PM Meeting Barry Manis Munis-Samuel Capital Management LLC , Murray Huberfeld, Mark Nordlicht, Stewart Kim, David Bodner	401, 403
PX 454	CTRL5179914	5/16/14	From: Albanese To: Mannis	RE: 3:00 PM meeting Barry Mannis and Murray Huberfeld	401, 403, 802
PX 455	PPVA_RH_0362814	5/16/14	From: Albanese To: Broder, Rusbasan, Padden, Huberfeld, Lau and Nordlicht	SALT 2:15 PM Chuck Rusbasan CEO - James Broder Balbec Starwood Capital Murray Huberfeld, David Bodner, Mark Nordlicht	401, 403
PX 456	CTRL5179906	5/16/14	From: Albanese To: Broder	RE: Starwood Capital/Balbec Capital meeting Murray Huberfeld	401, 403, 802
PX 457	PPVA_RH_0362890	5/16/14	From: Albanese To: Penna, Bahiri, Huberfeld, Nordlicht, and Lau	SALT 2:00 PM Meeting Mark Penna, Mark Bahiri, Mark Nordlicht, Murray Huberfeld, David Bodner	401, 403
PX 458	CTRL5098060	5/16/14	From: Albanese To: Penna	RE: SALT Meeting	401, 403, 802
PX 459	CTRL5104312	7/1/14	From: Huberfeld To: Albanese	Fwd: july 1	401, 403, 802
PX 460	BW-SHIP-00457424	7/28/14	From: Propper To: Levy	No Subject	401, 403, 802
PX 461	CTRL5191434	7/31/14	From: Nordlicht To: Wiener	RE: Arabella	401, 403, 802
PX 462	CTRL6409197	8/21/14	From: Solomont To: Bodner	Re: Castle Hill Gaming - Meeting Follow Up	401, 403, 802
PX 463	CTRL0014669	2/24/14	From: Fuchs To: Albanese	No Subject	401, 403, 802, Rule 56 (China Horizon)
PX 464	CTRL0543081	7/27/10	From: Fuchs To: Albanese	Fw: Confidential - Investor Update	401, 403, 802, Rule 56 (China Horizon)
PX 465	CTRL4523457	8/16/13	From: Nordlicht To: Clingman	No Subject	401, 403, 802, Rule 56 (China Horizon)
PX 466	CTRL4804110	8/19/13	From: Nordlicht To: Clingman	No Subject	401, 403, 802, Rule 56 (China Horizon)
PX 467	CTRL4524221	8/21/13	From: Albanese To: Huberfeld	Wednesday August 21	401, 403, 802, Rule 56 (China Horizon)

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 468	CTRL4763222	8/22/13	From: Levy To: Nordlicht	No Subject	401, 802, Rule 56 (China Horizon)
PX 469	CTRL3714001	8/27/13	From: Clingman To: Huberfeld	No Subject	401, 802, Rule 56 (China Horizon)
PX 470	CTRL5171001	3/6/14	From: Fuchs To: Albanese	Bridge	401, 403, 802, Rule 56 (China Horizon)
PX 471	CTRL5174346	4/8/14	From: Clingman To: Albanese	No Subject	401, 403, 802, Rule 56 (China Horizon)
PX 472	CTRL7241597	8/30/14	From: Nordlicht To: Clingman	Re: Investor Tracking List, Series D15Aug28Bxlsx	401, 403, 802, Rule 56 (China Horizon)
PX 473	CTRL7287099	9/11/15	From: Clingman To: Huberfeld, Bodner, Nordlicht, Saks	FW: China-Horizon-Cor-Video-04	401, 403, 802, Rule 56 (China Horizon)
PX 474	CTRL7661163	2/3/15	From: Steinberg To: Beren	Re: PEDEVCO	401, 802
PX 475	CTRL7689728	2/10/15	From: Huberfeld To: Steinberg	Re: PEDEVCO Consents all the transactions for the merger	401, 802
PX 476	CTRL0737650	12/16/10	From: ma2500@aolcom To: Albanese	FW: Summaries	401, 403
PX 477	CTRL3250904	4/15/12	From: Landesman To: Nordlicht	No Subject	401, 403, 802
PX 478	CTRL3174653	5/31/12	From: Nordlicht To: ma2500@aolcom	No Subject	401, 403
PX 479	CTRL3446575	12/11/12	From: Landesman To: Nordlicht	RE: Orders	401, 403, 802
PX 480	CTRL3350138	12/12/12	From: Levy To: Albanese	Fwd: Black Elk - 12/12/12 - Houston Chronicle Article	401, 403, 802
PX 481	CTRL4517587	1/28/13	From: Nordlicht To: Levy	No Subject	401, 403, 802
PX 482	CTRL3641764	1/31/13	From: Huberfeld To: Levy, Kalter, Edelstein	After funding of bayberry	401, 403, 802, Rule 56
PX 483	CTRL3645438	2/6/13	From: Huberfeld To: Levy, Edelstein, Nordlicht, Kalter	Prospects	401, 403, 802, Rule 56
PX 484	CTRL4997418	9/11/14	From: Nordlicht To: Levy	No Subject	403, 802, Rule 56
PX 485	CTRL5006332	9/12/14	From: Nordlicht To: Levy	No Subject	403, 802, Rule 56
PX 486	BW-SHIP-01340284	11/25/14	From: Taylor To: Saks	Re: Did you want to talk?	401, 403, 802
PX 487	CTRL6425330	1/6/15	From: Small To: Nordlicht	David Bodner	401, 403, 802
PX 488	CTRL7037745	7/5/15	From: Nordlicht To: Levy	No Subject	
PX 489	CTRL7473428	11/5/15	From: Levy To: Nordlicht	Re: With scott	401, 403, 802
PX 490	CTRL3339876	6/26/12	From: Abanese To: Albanese	Wednesday June 27th	401, 403, 802
PX 491	CTRL3324131	8/8/12	From: Katzenstein To: Nordlicht	RE: this eve?	401, 403, 802
PX 492	CTRL6146840	5/18/14	From: Katzenstein To: Nordlicht	RE: quck call	401, 403, 802
PX 493	CTRL5180547	5/21/14	From: Katzenstein To: Bodner	Fwd: discussion about OBEX investment	401, 403, 802
PX 494	CTRL6331008	5/26/14	From: Katzenstein To: Nordlicht	Re: OBEX Term sheet	401, 403, 802
PX 495	CTRL5185263	6/20/14	From: Katzenstein To: Huberfeld, Bodner	FW: SBA & USDA Analysis and Market Background: Confidential	401, 403, 802
PX 496	ALB0000173	11/2/14	From: Katzenstein To: Huberfeld	Fwd OBEX	401, 403, 802
PX 497	CTRL3694219	4/4/13	From: Edelstein To: Huberfeld	ppbe breakdown	401, 403, 802
PX 498	CTRL3756202	4/29/13	From Edelstein, To Fox	PPBE Management distribution for Q1 2013	401, 403, 802

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 499	CTRL5213764	1/9/14	From: Edlestein To: Fox	PPBE Management wires	401, 403, 802
PX 500	CTRL5174119	4/7/14	From: Bodner To: Albanese	For David	401, 403, 802, Rule 56
PX 501	ALB0000068	10/20/14	From: Northwood To: Bodner	Fwd New numbers and info	401, 403
PX 502	CTRL4976660	9/7/14	From: Nordlicht To: Levy	No Subject	401, 403, 802
PX 503	CTRL7368199	10/11/15	From: Nordlicht To: Ruiz-Gimenez	No Subject	401, 403, 802
PX 504	CTRL7423849	10/20/15	From: Baez To: Uri Landesman; David Levy; Bernie Fuchs; Murray Huberfeld; Kerry Propper	Dinner	
PX 505	CTRL7426352	10/20/15	From: Nordlicht To: Werblowsky	Re: atty client privilege	401, 403, 802
PX 506	CTRL7604849	12/21/15	From: Nordlicht To: Baez	No Subject	401, 403, 802
PX 507	CTRL7614608	12/22/15	From: Nordlicht To: Levy	No Subject	802, subject to purpose, jury instruction
PX 508	CTRL8538587	2/11/16	From: Nordlicht To: Muller	Fwd: Lawyer letter	CTRL no. - missing or incorrect
PX 509	CTRL7051180	7/7/15	From: Rudberg To: Kalter	RE: Katz - All Clear	401 subject to purpose, 802
PX 510	CTRL7073029	7/14/15	From: Delgado To: Bodner	from Marcos Katz	
PX 511	CTRL7075303	7/14/15	From: Nordlicht To: Bodner	Re: from Marcos Katz	
PX 512	CTRL7823615	4/11/16	From: Levy To: Nordlicht	Re: letter to katz	802
PX 513	CTRL7913449	5/10/16	From: Nordlicht To: Katz	No Subject	
PX 514	CTRL7915268	5/11/16	From: Baez To: Nordlicht	RE: Neeman	
PX 515	CTRL7915622	5/11/16	From: Baez To: mdk@promotoradinacom	FW: Mark Nordlicht	
PX 516	AN004907	5/10/16	N/A	N/A	403
PX 517	CTRL7920310	5/13/16	From: Katz To: Levy	statement	
PX 518	CTRL7942765	5/20/16	From: Katz To: Nordlicht	Re: Proposed email to mr Katz	
PX 519	CTRL1801391	11/21/11	From: Fuchs To: Landesman	Re: I can be in LA the 6th and the 7th	401, 403, 802
PX 520	CTRL3207660	1/3/12	From: Fuchs To: ma2500@aolcom, Landesman	No Subject	401
PX 521	CTRL4526097	8/29/13	From: Fuchs To: Albanese	No Subject	401, 403, 802
PX 522	CTRL5212691	3/5/14	From: Albanese To: Landesman, Nordlicht, Fuchs	Re: Monday March 10, 2014 Prime Grill 5PM ?	
PX 523	CTRL6032619	8/6/14	From: Landesman To: Fuchs	FW: Numbers	401, Rule 56
PX 524	CTRL5040507	8/13/14	From: Ottensoser To: SEC Staff	Examination of Platinum Management (NY) LLC and all relying Advisers ("Advisers")	106 - need to see response
PX 525	CTRL5789637	11/5/14	From: Ottensoser To: SEC Staff	Examination of Platinum Management (NY) LLC and all relying Advisers ("Advisers")	106 - need to see response
PX 526	CTRL8428778	10/8/14	From: Ottensoser To: SEC Staff	Examination of Platinum Management (NY) LLC and all relying Advisers ("Advisers")	106 - need to see response
PX 527	CTRL3773340	1/25/13	From: Huberfeld To: Fuchs	This is the e mail I am sending out. Send me comments	
PX 528	CTRL4685737	8/26/13	From: Fuchs To: Nordlicht	Atty client privilege	

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 529	CTRL6131165	1/9/14	From: Fuchs To: Nordlicht	Meeting	
PX 530	CTRL5055373	7/8/14	From: Nordlicht To: Ritterman, Manela, Huberfeld, Fuchs	No Subject	401, 403, 802
PX 531	CTRL7430667	10/22/15	From: Nordlicht To: Weiner, Stenberg	Fwd: confidential	
PX 532	CTRL7725772	1/3/16	From: Nordlicht To: Landesman, Levy CC: Huberfeld, Fuchs, Werblowsky	Atty client privilege	
PX 533	N/A	N/A	Various	Summary Exhibit of Meetings Attended by Bodner Relating to Platinum/Beechwood (see Schedule 1)	401, 403, FRCP 56; Bodner reserves the right to object
XV. Exhibits Concerning Overvaluation					
PX 534	CTRL3347753	4/3/12	From: Nordlicht To: Hirt CC: Latkin	Re: AmRich deal overview	802
PX 535	CTRL3848459	3/10/13	From: Nordlicht To: Hirt	Re:RE:Re	802
PX 536	CTRL4478776	1/9/13	From: Nordlicht To: Small	1-8-2013 Daily Summary	802
PX 537	CTRL3854871	3/25/13	From: Nordlicht To: Hirt	Re: Potential golden gate proposals	802
PX 538	CTRL4348853-8855	4/5/13	From: Nordlicht To: Hoffman	FW: SMV/Casmalia Preliminary estimates	802
PX 539	CTRL4331390	4/5/13	From: Nordlicht To: Hirt	(No Subject)	802
PX 540	CTRL4676873	7/9/13	From: Garza To: Levy, Hoffman, others	RE: Progress	401, 802
PX 541	CTRL4676879	7/9/13	From: Garza To: Levy, Hoffman, others	RE: Progress	802
PX 542	CTRL5998414	1/14/14	From: Nordlicht To: Huberfeld	FW:Trading Comparable GGO 2013 staticxlsx	802
PX 543	CTRL5125777	2/3/14	From: Nordlicht To: Hirt CC: SanFilippo	Re: Funding	802
PX 544	CTRL6917554	April 2014- June 2015	Weekly Hirt emails to the Beechwood Valuations Listserv	GGO Update	401, 802, Rule 56
PX 545	CTRL7010259	6/25/15	From: Mandelbaum To: Edelstein, Manela CC: SanFilippo, others	RE: The beechwood invoices arrived today	401, 802, Rule 56
PX 546	CTRL5986986 - CTRL5986987	6/1/14	From: Duch To: Various BDO employees	FW: Golden Gate Questions from BDO	
PX 547	CTRL6216582- 6216583	8/12/14	From: Amiel David To: Hirt, Lee (AmRich Energy)	Going Forward	
PX 548	CTRL4971690	9/5/14	From: SanFilippo To: Sterling Valuation Group	(No Subject)	
PX 549	CTRL4971690	9/5/14	From: Hirt To: PositionUpdates Platinum listserv	FW: Deal Updates	802
PX 549	CTRL6942537	6/8/15	From: Hirt To: PositionUpdates Platinum listserv	Update on GGO and Abdala	802
PX 550	CTRL7255521	9/1/15	From: Weiner To: Nordlicht CC: Levy	Re: \$190K GGO Funding Request for TODAY	
PX 551	CTRL6153954	1/17/14	From: Nordlicht To: Levy, Small, Ottensoser, Hoffman CC: Shulse	Atty client privilege	401, 802

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 552	CTRL5026390 - CTRL5026391	3/28/2014 - 3/18/2014	From: Nordlicht To: Rakower, JSF From: Small To: Nordlicht CC: Salfati	FW:Black Elk 2013 EBITDA	
PX 553	CTRL6187555	3/17/14	From: Small To: Nordlicht	Fwd: 2012 P&L	401, 802
PX 554	CTRL5081596, 5081599	1/9/14	From: Steinberg To: Albanese	Fwd: Black Elk Report	401, 802
PX 555	ALB0000454	11/21/14	From: BodnerangHuberfeld To: David Bodners Email	Fwd: Schedule	401, 802
PX 556	ALB0000057	9/15/14	From: Levy To: Bodnerang	Private Loan Interest Cal 9 30 14	401
PX 557	ALB0000058	9/15/14	From: Levy To: Bodnerang	Private Loan Interest Cal 9 30 14	401
PX 558	CTRL6131656	4/1/14	From: Seitler To: Mueller CC: Nordlicht	Re:	802
PX 559	CTRL6326022	6/23/14	From: Nordlicht To: Levy, Small, Ottensoser	Re: Atty client privilege black elk more to do	401, 802
PX 560	CTRL6149182	6/9/14	From: Nordlicht To: Small, Levy, Saks CC: Steinberg, Ottensoser	Atty client privilege	401, 802, Rule 56
PX 561	CTRL7194654	8/12/15	From: Levy To: Nordlicht CC: Weiner	Fwd: Northstar Critical Payments-Funding request	802
PX 562	CTRL6765978	4/30/15	From: Feuer To: Nordlicht	(No Subject)	401, 802, Rule 56
PX 563	CTRL7262074	9/3/15	From: Levy To: Weiner CC: Nordlicht	RE: AP	802
PX 564	CTRL7622417	12/28/15	From: Nordlicht To: Weiner CC: Levy	Re: Valuation and public filing work	802
PX 565	CTRL5930558	12/9/14	From: Nordlicht To: Manela CC: SanFilippo, Steinberg, Levy, others	Re: latest black elk market	401, 802, Rule 56
PX 566	BW-SHIP-00727882	1/12/15	From: Feuer To: Huberfeld	Fwd: Black Elk Schedule	401, 802, Rule 56
PX 567	BW-SHIP-00726472	1/30/15	From: Saks To: Feuer; Taylor	cno	401, 802, Rule 56
PX 568	BW-SHIP-00801457-58	1/29/15	From: Saks To: Adler; Edelstein; Rakower; Manela	Investment memo	401, 802, Rule 56
PX 569	CTRL8133336	2/20/14		Letter from Koehler & Isaacs LLP to SS&C,	401, 802, Rule 56
PX 570	CTRL5062849	3/3/14	From: Kimmelman To: Investor Relations	Coba Wire In	401, Rule 56
PX 571	CTRL6069256	3/3/14	From: Landesman To: Huberfeld	FW: Coba Wire in	401, Rule 56
PX 572	CTRL6046371	3/3/14	From: Kimmelman To: Jessica Baker	Please Move	401, Rule 56
PX 573	CTRL8126284	7/20/16	From: Justin Roth To: Kimmelman	Additional Information Needed	401 objection to portion on COBA
PX 574	CTRL8126284	7/20/16	From: Justin Roth To: Kimmelman	Additional Information Needed	
PX 575	CTRL8133356	3/4/14	From: Kimmelman To: Jessica Baker	Wires today	
PX 576	CTRL6311389	3/4/14	From: Kimmelman To: Janet Liz	Mark Nordlicht Grantor Trust	
PX 577	CTRL8094846	12/15/14			401, 403, Rule 56
PX 578	CTRL5960144	12/15/14	From: Rechnitz To: Albanese	Re: David Bodner	401, 403, Rule 56
PX 579	CTRL6973196	6/7/15	From: Mani Katari To: Mandelbaum	Valuations Summary	
PX 580	CTRL6971903	6/17/15	From: Mani Katari To: SanFilippo, Mandelbaum	Valuations Summary	
PX 581	CTRL6714049	4/17/15	From: Nordlicht, To: George Renick, Mandelbaum, Marzella, Levy	Platinum	401, 403, 802
PX 582	CTRL6204129	3/13/14	From: Fuchs To: Gilad Kalter	Fwd: Opportunity	401, 802, Rule 56
PX 583	CTRL5197765	7/22/14	From: Nordlicht To: Fuchs, Huberfeld	Re: Fwd:	401, 802, Rule 56
PX 584	CTRL5546932	7/24/14	From: Ritterman To: Nordlicht, Fuchs	PPBE Pending	401, Rule 56
PX 585	BW-SHIP-01015423	9/17/15	From: Nordlicht To: Saks	Re: Fwd:	401, 802

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 586	PPVA_RH_0360793	5/11/14	From: Nordlicht To: Fuchs, Landesman	We have had some turmoil in event drivenbiotech here is update in case u talking to investors	401, 802
XVI. Exhibits Relating to Late-Stage Overvaluation					
PX 587	CTRL7591043	12/13/15	From: Fuchs To: Nordlicht Huberfeld	Re:	401, 802
PX 588	CTRL7736228	1/8/16	From: Nordlicht To: Huberfeld, CC: Fuchs BCC: Gerszberg, Levy	(No Subject)	802
PX 589	CTRL8003977-78	1/11/16	From: Manela To: Levy	(No Subject)	401, 802, Rule 56
PX 590	CTRL8008893-94	1/12/16	From: Dan Grabon (the collective) To: Gerszberg, Manela, Steinberg	Latest presentation	401, 802, Rule 56
PX 591	CTRL7725772	1/3/16	From: Nordlicht To: Landesman, Levy CC: Huberfeld, Fuchs, Werblowsky	Atty client privilege	401, 802
PX 592	CTRL8011541-45	1/14/16	From: Steinberg To: Manela	Take a look at these in number order -- it tells a story	401, 802, Rule 56
PX 593	CTRL8189631	1/30/16	From: Huberfeld To: Nordlicht, Bodner		
PX 594	CTRL7942937	5/20/16	From: Nordlicht To: Fuchs CC: Katz, Levy	Re: Proposed email to mr Katz	
PX 595	CTRL8013433-34	1/4/16	From: Huberfeld To: Nordlicht, Bodner	Fwd: From Mrs Katz	802
XVII. Bank Statements and Account Documents					
PX 596	CTRL8379421		List of Bank Accounts for PPVA and related entities		
PX 597	DOJ_CTRL_001123	5/31/12-July 2016	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund LP for Account # ****0148 at Sterling National Bank		
PX 598	DOJ_CTRL_001056	7/1/12-May 2016	Compilation of Bank Statements for Platinum Management (NY) LLC for Account # ****0447 and ****2784 at Sterling National Bank		
PX 599	DOJ_CTRL_001057	6/1/16	Account Statement for Platinum Management (NY) LLC for Account ****0447 at Sterling National Bank		
PX 600	DOJ_CTRL_001026	3/31/14-October 2016	Compilation of Bank Statements for Nordlicht Management III for Account # ****5454 at Sterling National Bank		
PX 601	DOJ_CTRL_001137	July 2015-2016	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund LP for Account # ****0156 at Sterling National Bank		
PX 602	DOJ_CTRL_001170	7/01/12-December 2015	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 603	CTRL8309438	1/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 604	CTRL8309334	2/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 605	CTRL7802582	3/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 606	CTRL7913556	4/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 607	CTRL8027786	5/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 608	CTRL8577860	6/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 609	CTRL8577861	7/1/16	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund International (Limited) for Account # ****0463 and ****0519 at Sterling National Bank		
PX 610	DOJ_CTRL_001153	7/1/2012-May 2016	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund LP for Account # ****0498 at Sterling National Bank		
PX 611	DOJ_CTRL_001149	7/1/2012-May 2016	Compilation of Bank Statements for Platinum Partners Value Arbitrage Intermediate Fund LP for Account # ****0500 at Sterling National Bank		
PX 612	DOJ_CTRL_001042	12/31/2012- April 2015	Compilation of Bank Statements for Mark Nordlicht Grantor Trust, Mark Nordlicht Trustee for Account # ****3162 at Sterling National Bank		
PX 613	DOJ_CTRL_000004	7/1/2012-03/02/2014	Compilation of Bank Statements for Platinum Partners Value Arbitrage Fund (USA) LP for Account # ****0455 and ****0527 at Sterling National Bank		
PX 614	DOJ_CTRL_000085	3/31/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # ****0455 and ****0527 at Sterling National Bank		
PX 615	CTRL6624352 @ 14-17	4/30/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # ****0455 and ****0527 at Sterling National Bank		
PX 616	CTRL6624352 @ 18-22	5/30/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # ****0455 and ****0527 at Sterling National Bank		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 617	CTRL6624352 @ 23-25	6/30/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 618	CTRL6624352 @ 26-28	7/31/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 619	CTRL6624352 @ 29-33	8/29/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 620	CTRL6624352 @ 34-38	9/30/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 621	CTRL6624352 @ 39-41	10/31/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 622	CTRL6624352 @ 45-50	11/1/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 623	CTRL6624352 @ 51-56	12/1/14	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 624	CTRL6530448	1/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 625	CTRL6592040	2/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 626	CTRL6694025	3/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 627	CTRL6818508	4/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 628	CTRL6924798	5/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 629	CTRL7052363	6/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 630	CTRL7193571	7/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 631	CTRL7261120	8/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 632	CTRL7358659	9/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 633	CTRL7492512	10/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 634	CTRL7568729	11/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 635	CTRL7734785	12/1/15	Account Statement for Platinum Partners Value Arbitrage Fund (USA) LP for Account # *****0455 and *****0527 at Sterling National Bank		
PX 636	DOJ_CTRL_001251	12/31/2011-03/05/2015	Compilation of Account Statements for Mark Nordlicht Grantor Trust II for Account # *****1372 at Capital One Bank		
PX 637	DOJ_CTRL_001008	7/1/2012-11/15/2016	Compilation of Account Statements for Dahlia Kalter for Account # *****0682 at Sterling National Bank		
PX 638	DOJ_CTRL_001032	7/1/2012-10/5/2016	Compilation of Account Statements for Mark Nordlicht for Account # *****0703 at Sterling National Bank		
PX 639	DOJ_CTRL_001181	7/1/2012-3/31/2015	Compilation of Account Statements for PPVA Black Elk (Cayman), Ltd for Account # *****0367 at Sterling National Bank		
PX 640	DOJ_CTRL_001189	7/1/2012-5/31/2016	Compilation of Account Statements for PPVA Black Elk (Equity), Ltd for Account # *****0375 at Sterling National Bank		401, FRCP 56
PX 641	DOJ_CTRL_001190	7/1/2012-3/31/2015	Compilation of Account Statements for PPVA Black Elk (Investor), Ltd for Account # *****0383 at Sterling National Bank		
PX 642	AN015036	7/5/05	Compilation of Account Statements for Grosser Lane Management LLC for Account # *****7308 at Metropolitan National Bank		
PX 643	AN015061	7/6/05	Compilation of Account Statements for Grosser Lane Management LLC for Account # *****7308 at Metropolitan National Bank		
PX 644	CTRL7020228	4/30/15	Account Statement for Monsey Equities LLC for Account # ****0941 at Monsey Equities LLC		
PX 645	CTRL6046798-99	2/21/14	Email from Joseph San Filippo with attachment labeled "Document 12"		802
PX 646	CAPITALONE_0000059	1/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 647	CAPITALONE_0000060	2/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 648	CAPITALONE_0000061	3/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 649	CAPITALONE_0000062	4/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 650	CAPITALONE_0000063	5/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 651	CAPITALONE_0000064	6/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 652	CAPITALONE_0000065	7/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 653	CAPITALONE_0000066	8/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 654	CAPITALONE_0000067	9/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 655	CAPITALONE_0000068	10/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 656	CAPITALONE_0000069	11/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 657	CAPITALONE_0000070	12/1/13	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 658	CAPITALONE_0000071	1/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 659	CAPITALONE_0000072	2/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 660	CAPITALONE_0000073	3/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 661	CAPITALONE_0000074	4/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 662	CAPITALONE_0000075	5/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 663	CAPITALONE_0000076	6/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 664	CAPITALONE_0000077	7/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 665	CAPITALONE_0000078	8/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 666	CAPITALONE_0000079	9/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 667	CAPITALONE_0000080	10/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 668	CAPITALONE_0000081	11/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 669	CAPITALONE_0000082	12/1/14	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 670	CAPITALONE_0000083	1/1/15	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
PX 671	CAPITALONE_0000084	2/1/15	Account Statement for Platinum Partners Black Elk Opportunities Fund LLC for Account # *****5613 at Capital One Bank		401
XVIII. SS&C Statements and Reconciliations					
PX 672	CTRL4322969	12/31/12	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 673	CTRL4322991	12/31/12	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 674	CTRL4322995	12/31/12	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 675	CTRL4410567	1/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 676	CTRL4410571	1/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 677	CTRL4395272	2/28/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 678	CTRL4395276	2/28/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 679	CTRL4430778	3/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 680	CTRL4430782	3/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 681	CTRL4458244	4/30/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 682	CTRL4458248	4/30/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 683	CTRL4561258	5/31/13	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 684	CTRL4561280	5/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 685	CTRL4561284	5/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 686	CTRL4661782	6/30/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 687	CTRL4661786	6/30/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 688	CTRL4704288	7/31/13	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 689	CTRL4704310	7/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 690	CTRL4704314	7/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 691	CTRL4797113	8/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 692	CTRL4797117	8/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 693	CTRL4805758	9/30/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 694	CTRL4805762	9/30/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 695	CTRL4825620	10/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 696	CTRL4825624	10/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 697	CTRL4841330	11/30/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 698	CTRL4841334	11/30/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 699	CTRL6084306	12/31/13	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 700	CTRL6084310	12/31/13	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 701	CTRL6273141	1/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 702	CTRL6273145	1/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 703	CTRL6276913	2/28/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 704	CTRL6276917	2/28/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 705	CTRL6156737	3/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 706	CTRL6156741	3/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 707	CTRL6328561	4/30/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 708	CTRL6328565	4/30/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 709	CTRL6039659	5/31/14	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 710	CTRL6039683	5/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 711	CTRL6039687	5/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 712	CTRL6028476	6/30/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 713	CTRL6028482	6/30/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 714	CTRL4991058	7/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 715	CTRL4991064	7/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 716	CTRL5673765	8/31/14	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 717	CTRL5673787	8/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 718	CTRL5673793	8/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 719	CTRL5798489	9/30/14	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 720	CTRL5798511	9/30/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 721	CTRL5798511	9/30/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 722	CTRL5911695	10/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 723	CTRL5911703	10/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 724	CTRL6448119	11/30/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 725	CTRL6448127	11/30/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 726	CTRL6448511	12/31/14	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 727	CTRL6448529	12/31/14	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 728	CTRL6448537	12/31/14	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 729	CTRL6697021	1/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 730	CTRL6697029	1/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 731	CTRL6697079	2/28/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 732	CTRL6697087	2/28/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 733	CTRL6787747	3/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 734	CTRL6787755	3/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 735	CTRL6913483	4/30/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 736	CTRL6913491	4/30/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 737	CTRL7035491	5/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 738	CTRL7035499	5/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 739	CTRL7129439	6/30/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 740	CTRL7129447	6/30/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 741	CTRL7261669	7/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 742	CTRL7261677	7/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 743	CTRL7327096	8/31/15	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 744	CTRL7327118	8/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 745	CTRL7327126	8/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 746	CTRL7451989	9/30/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 747	CTRL7451997	9/30/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 748	CTRL7544148	10/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 749	CTRL7544156	10/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 750	CTRL8013318	11/30/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 751	CTRL8013326	11/30/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 752	CTRL8296305	12/31/15	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 753	CTRL8296313	12/31/15	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 754	CTRL7803667	1/31/16	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 755	CTRL7803675	1/31/16	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 756	CTRL7814105	2/29/16	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 757	CTRL7814113	2/29/16	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 758	CTRL7882125	3/31/16	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 759	CTRL7882133	3/31/16	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 760	CTRL8021630	4/30/16	Platinum Partners Value Arbitrage Fund LP - VAM - Balance Sheet		
PX 761	CTRL8021654	4/30/16	Platinum Partners Value Arbitrage Fund LP -- VAM - Long/Short Position Summary		
PX 762	CTRL8021662	4/30/16	Platinum Partners Value Arbitrage Fund, LP -- Trial Balance with SubAccount Detail in USD		
PX 763	n/a		Cash Reconciliation of Management Fees. See Exhibit 24 to the June 2, 2020 Declaration of Richard A. Bixter, Jr. (ECF No. 639)		802
PX 764	CTRL6144427	4/30/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 765	CTRL4990573	7/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 766	CTRL6448415	12/31/14	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 767	CTRL7129097	6/30/15	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 768	CTRL7803823	1/31/16	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 769	CTRL7809778	2/29/16	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 770	CTRL7880816	3/31/16	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 771	CTRL8021493	4/30/16	Platinum Value Arbitrage Fund (USA), LP -- Investor Capital Detail for Partnerships		
PX 772	CTRL4389633	12/31/12	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 773	CTRL4365110	1/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 774	CTRL4315874	2/28/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 775	CTRL4511880	3/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 776	CTRL4513467	4/30/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 777	CTRL4832679	5/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 778	CTRL4597558	6/30/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 779	CTRL4723487	7/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 780	CTRL4629770	8/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 781	CTRL4637224	9/30/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 782	CTRL4825498	10/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 783	CTRL4814633	11/30/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 784	CTRL6009090	12/31/13	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 785	CTRL6253264	1/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 786	CTRL6277016	2/28/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 787	CTRL6119206	3/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 788	CTRL6119556	4/30/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 789	CTRL6038634	5/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 790	CTRL6032947	6/30/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 791	CTRL4990993	7/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 792	CTRL5673842	8/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 793	CTRL5798617	9/30/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 794	CTRL5911410	10/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 795	CTRL6448001	11/30/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 796	CTRL6448379	12/31/14	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 797	CTRL6696770	1/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 798	CTRL6696516	2/28/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 799	CTRL6788105	3/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 800	CTRL6883287	4/30/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 801	CTRL7035545	5/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 802	CTRL7129162	6/30/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 803	CTRL7284967	7/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 804	CTRL7261204	8/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 805	CTRL7452196	9/30/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 806	CTRL7544640	10/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 807	CTRL8013634	11/30/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 808	CTRL8282525	12/31/15	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 809	CTRL7803564	1/31/16	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 810	CTRL7809778	2/29/16	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 811	CTRL7882692	3/31/16	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		
PX 812	CTRL8021432	4/30/16	Platinum Value Arbitrage Fund (Int'l), LP -- Investor Capital Detail for Partnerships		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 813					missing
PX 814	CTRL4308230	1/31/13	SS&C transmission of January '13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 815	CTRL4518777	2/28/13	SS&C transmission of Feb'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 816	CTRL4555984	3/31/13	SS&C transmission of March'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 817	CTRL4414329	4/30/13	SS&C transmission of April'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 818	CTRL4504713	5/31/13	SS&C transmission of May'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 819	CTRL4618255	6/30/13	SS&C transmission of June'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 820	CTRL4778105	7/31/13	SS&C transmission of July'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 821	CTRL4612455	8/31/13	SS&C transmission of August'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 822	CTRL4605543	9/30/13	SS&C transmission of September'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 823	CTRL4779281	10/31/13	SS&C transmission of October'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 824	CTRL4776548	11/30/13	SS&C transmission of November'13 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
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PX 826	CTRL6222756	1/31/14	SS&C transmission of January'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 827	CTRL6198803	2/28/14	SS&C transmission of February'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 828	CTRL6201323	3/31/14	SS&C transmission of March'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 829	CTRL6312968	4/30/14	SS&C transmission of April'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 830	CTRL6291822	5/31/14	SS&C transmission of May'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 831	CTRL5553439	6/30/14	SS&C transmission of June'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 832	CTRL4939713	7/31/14	SS&C transmission of July'14 Cash recon and Cash Ledger PPVA USA #PLATINUMM#		
PX 833	CTRL5333948	8/31/14	SS&C transmission of August'14 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 834	CTRL5784488	9/30/14	SS&C transmission of September'14 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 835	CTRL5880603	10/31/14	SS&C transmission of October'14 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 836	CTRL7651589	11/30/14	SS&C transmission of November'14 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 837	CTRL7690006	12/31/14	SS&C transmission of December'14 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 838	CTRL6624819	1/31/15	SS&C transmission of January'15 Cash recon and Cash Ledger PPVA USA #PLATINUM_MAN1#		
PX 839	CTRL6681907	2/28/15	SS&C transmission of February'15 Cash recon and Cash Ledger PPVA USA		
PX 840	CTRL6747202	3/31/15	SS&C transmission of March'15 Cash recon and Cash Ledger PPVA USA		
PX 841	CTRL6862911	4/30/15	SS&C transmission of April'15 Cash recon and Cash Ledger PPVA USA		
PX 842	CTRL6988141	5/31/15	SS&C transmission of May'15 Cash recon and Cash Ledger PPVA USA		
PX 843	CTRL7104573	6/30/15	SS&C transmission of June'15 Cash recon and Cash Ledger PPVA USA		
PX 844	CTRL7235390	7/31/15	SS&C transmission of July'15 Cash recon and Cash Ledger PPVA USA		
PX 845	CTRL7307589	8/31/15	SS&C transmission of August'15 Cash recon and Cash Ledger PPVA USA		
PX 846	CTRL7430303	9/30/15	SS&C transmission of September'15 Cash recon and Cash Ledger PPVA USA		
PX 847	CTRL7524572	10/31/15	SS&C transmission of October'15 Cash recon and Cash Ledger PPVA USA		
PX 848	CTRL7622497	11/30/15	SS&C transmission of November'15 Cash recon and Cash Ledger PPVA USA		
PX 849	CTRL8281339	12/31/15	SS&C transmission of December'15 Cash recon and Cash Ledger PPVA USA		
PX 850	CTRL7760638	1/31/16	SS&C transmission of January'16 Cash recon and Cash Ledger PPVA USA		
PX 851	CTRL7807097	2/29/16	SS&C transmission of February'16 Cash recon and Cash Ledger PPVA USA		
PX 852	CTRL7857199	3/31/16	SS&C transmission of March'16 Cash recon and Cash Ledger PPVA USA		
PX 853	CTRL7983385	4/30/16	SS&C transmission of REVISED April'16 Cash recon and Cash Ledger PPVA USA		
PX 854	CTRL8133627	5/31/16	SS&C transmission of May'16 Cash recon and Cash Ledger PPVA USA		
PX 855	CTRL4462393	12/31/12	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 856	CTRL4428947	1/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 857	CTRL4394957	2/28/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 858	CTRL4375219	3/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 859	CTRL4428312	4/30/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 860	CTRL4832710	5/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 861	CTRL4642523	6/30/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 862	CTRL4704234	7/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 863	CTRL4629822	8/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 864	CTRL4637313	9/30/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 865	CTRL4640321	10/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 866	CTRL4814691	11/30/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 867	CTRL6323891	12/31/13	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 868	CTRL6272652	1/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 869	CTRL6310695	2/28/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 870	CTRL6023390	3/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 871	CTRL6109528	4/30/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 872	CTRL6039871	5/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 873	CTRL6207969	6/30/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 874	CTRL4994136	7/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 875	CTRL5674177	8/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		

PX Ex. No.	Doc ID	Date	Description/Email Parties	Subject Line	Bodner's Objections
PX 876	CTRL5798385	9/30/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 877	CTRL5911693	10/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 878	CTRL6447931	11/30/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 879	CTRL6599193	12/31/14	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 880	CTRL6696557	1/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 881	CTRL6696639	2/28/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 882	CTRL6996472	3/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 883	CTRL6883327	4/30/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 884	CTRL7035570	5/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 885	CTRL7129536	6/30/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 886	CTRL7261654	7/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 887	CTRL7327080	8/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 888	CTRL7452155	9/30/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 889	CTRL7544276	10/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 890	CTRL8013206	11/30/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 891	CTRL8282986	12/31/15	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 892	CTRL7804774	1/31/16	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 893	CTRL7810228	2/29/16	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 894	CTRL7880755	3/31/16	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 895	CTRL8109346	4/30/16	Platinum Value Arbitrage Intermediate Fund, LTD -- Investor Capital Detail for Partnerships		
PX 896			Summary Exhibit of NAV Statements for PPVA		Bodner reserves the right to object
PX 897			Summary Exhibit of Cash and LP Interests Paid for Management and Incentive Fees		Bodner reserves the right to object
XIX. Miscellaneous					
PX 898		11/16/20	Clerk's Certificate of Default as to Platinum Management (NY) LLC, Trott v. Platinum Management (NY) LLC et al., Case No. 18-cv-10936-JSR, ECF No. 687		401, 403, FRCP 56
PX 899		6/28/21	Judgment in U.S. v. Huberfeld, No. 16-cr-00467-LJL, ECF No. 402		401, 403, FRCP 56
PX 900		11/5/21	Order in United States v. Landesman, 17 F.4th 298 (2d Cir. 2021)		401, 403, 802, FRCP 56; no reference provided
PX 901		8/12/22	Jury Verdict in the action captioned United States of America v. Small, No. 16-cr-00640 (BMC), ECF No. 960		401, 403, 802, FRCP 56
PX 902			PPVA Estate Ledger for Attorney Fees Incurred in Litigation against BDO and Blank Rome		401, 403, FRCP 56; no reference provided
PX 903		10/25/20	PPVA's Proof of Claim in re Nordlicht, Case No. 20-22782-rdd, Bankr. S.D.N.Y., Claim No. 5-1		401, 403, FRCP 56; no reference provided

Bodner notes his objection to the "Type of Meeting" column, which is Plaintiffs' unsupported characterization and bears no relationship to the content of the email. Bodner also objects to evidence about any meeting (1) that predates the damages period; (2) lacks any connection to PPVA; or (3) concerns assets that were excluded in the Court's summary judgment and/or Daubert decisions.

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL0546339	1/18/10	Solo Partners Meeting	Partners Meeting	401
CTRL0004045	2/23/10	Mark Nordlicht, David Bodner, Murray Huberfeld	Partners Meeting	401
CTRL0742072	3/9/10	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL0743250	3/23/10	Mark Nordlicht, David Bodner, Murray Huberfeld	Partners Meeting	401
CTRL0004132	4/7/10	David Bodner, Murray Huberfeld	Partners Meeting	401
CTRL0744511	4/14/10	Mark Nordlicht, David Bodner, Murray Huberfeld, Daniel Straus	Partners Meeting	401
CTRL0745181				
CTRL0537743				
CTRL0782406				
CTRL0537787	4/28/10	Mark Nordlicht, David Bodner, Uri Landesman, Eliot Lauer	Partners Meeting	401, 403
CTRL0004252	6/7/10	David Bodner, Murray Huberfeld, Jared Kushner, Charles Kushner	Investor/Deal	401
CTRL0540344	6/7/10	David Bodner, Murray Huberfeld, Mark Nordlicht, David Steinberg, Brian Jedwab	PMNY	401
CTRL0541394	6/22/10	David Bodner, Jona Rehnitz, Judi Lederer, Murray Huberfeld	Investor/Deal	401
CTRL0542819	7/22/10	Aaron Langer, Aaron Elgoben, David Bodner, Bernard Fuchs, Murray Huberfeld	Investor/Deal	401
CTRL0844583	7/27/10	Richard Geyser, David Bodner	PMNY	401
CTRL0833185				
CTRL0833186	8/11/10	David Bodner, Uri Landesman, Mark Nordlicht	Partners Meeting	401
CTRL0543745	8/16/10	Ari Hirt, Murray Huberfeld, David Bodner	PMNY	401
CTRL0543745	8/16/10	Murray Huberfeld, Brian Jedwab, Gilad Kalter, David Bodner, Darien Dash	PMNY	401
CTRL0813890	8/31/10	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL0675436	9/20/10	David Bodner, David Steinberg, Mark Nordlicht, Brian Jedwab	PMNY	401
CTRL0545751	10/6/10	Murray Huberfeld, David Bodner, David Levy, Isaac Barber	PMNY	401
CTRL0004447				
CTRL0546339	10/18/10	Michael Fallquist, Isaac Barber, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL0915324	10/18/10	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL0004538	11/3/10	Brian Jedwab, David Bodner	PMNY	401
CTRL0547730	11/12/10	Murray Huberfeld, David Bodner, Isaac Barber, David Levy, David Kaplan	PMNY	401
CTRL0728977	11/16/10	David Bodner, Mark Nordlicht, Uri Landesman, Eliot Lauer	Partners Meeting	401, 403
CTRL0644554	12/7/10	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL2072578	1/10/11	David Bodner, Uri Landesman, Eliot Lauer	PMNY	401, 403
CTRL1948543	1/14/11	David Bodner, Uri Landesman, Abraham Fruchthandler	Investor/Deal	401
CTRL1961221	1/19/11	David Bodner, Uri Landesman	PMNY	401
CTRL1619163	1/31/11	David Bodner, Michael Fallquist, Murray Huberfeld, Isaac Barber	Investor/Deal	401
CTRL1079488	2/10/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1621211	2/22/11	David Bodner, Michael Goldberg	PMNY	401
CTRL2090009	2/22/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1621941	3/1/11	David Bodner, Mark Nordlicht, Moshe Oratz	Investor/Deal	401
CTRL2076920	3/7/11	David Bodner, David Steinberg, Harvey Werblowsky	PMNY	401
CTRL1079512	3/8/11	Michael Goldberg, David Bodner, Murray Huberfeld	PMNY	401
CTRL1901956	3/14/11	David Bodner, Sam Adler	Beechwood	401
CTRL1901956	3/15/11	David Bodner, Bob Cohen, Uri Landesman	Investor/Deal	401
CTRL1918969	3/15/11	Jim McCarroll, Brian Jedwab, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL1902113	3/16/11	David Bodner, Bob Cohen, Uri Landesman	Investor/Deal	401
CTRL1902113	3/16/11	David Bodner, Sam Adler	Beechwood	401
CTRL1081739	3/31/11	Bob Cohen, David Bodner, Jack Simony	Investor/Deal	401
CTRL1903442	3/31/11	Ben Mayer, David Bodner	Deal	401
CTRL1903937	4/6/11	Bob Cohen, David Bodner, Jack Simony	Investor/Deal	401
CTRL1904509				
CTRL1866135	4/14/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1899606				
CTRL1934432				
CTRL1905273	5/2/11	David Bodner, Eliot Lauer, Mark Nordlicht	PMNY	401, 403
CTRL1905273	5/2/11	Harvey Werblowsky, David Bodner	PMNY	401
CTRL1905273	5/2/11	David Bodner, Michael Goldberg	PMNY	401
CTRL1905273	5/2/11	Moshe Oratz, David Bodner, Murray Huberfeld, Mark Nordlicht	Investor/Deal	401
CTRL1082278	5/4/11	David Bodner, Joseph Ritterman,	PMNY	401
CTRL1905572	5/4/11	Glenn Meyers, Murray Huberfeld, David Bodner	Investor/Deal	401
CTRL2129394	5/4/11	David Bodner, Mark Nordlicht, Brian Jedwab, Mitch Schwartz	PMNY	401
CTRL1082282				
CTRL1906008	5/9/11	Joel Edelstein, Joseph Ritterman, David Bodner	PMNY	401
CTRL1906008	5/9/11	Ben Mayer, David Bodner	Deal	401
CTRL1899478				
CTRL1907910	5/19/11	Mark Nordlicht, David Bodner, David Levy	PMNY	401
CTRL1907910	5/19/11	David Bodner, Isaac Barber	PMNY	401
CTRL1849521	5/25/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL1908392	5/25/11	David Bodner, Sam Adler	Beechwood	401
CTRL2172040	5/31/11	Michael Goldberg, David Bodner, Mark Nordlicht	PMNY	401
CTRL1079620				
CTRL1908988	6/2/11	David Bodner, David Levy, Isaac Barber Murray Huberfeld	PMNY	401
CTRL2043809	6/15/11	David Bodner, Daniel Small, David Levy, Yaniv	Investor/Deal	401
CTRL1079647	6/20/11	David Bodner Murray Huberfeld, Harvey Werblowsky, Jack Simony	PMNY	401
CTRL1892505	6/20/11	David Bodner, Harvey Werblowsky	PMNY	401
CTRL2097345		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1079653	6/22/11	Harvey Werblowsky, Uri Landesman, David Bodner	PMNY	401
CTRL1855113	6/28/11	Isaac Barber, David Bodner	PMNY	401
CTRL1886416	6/28/11	Murray Huberfeld, Uri Landesman, David Bodner, Isaac Barber, David Levy	PMNY	401
CTRL1079683	7/11/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL2098138	7/11/11	Murray Huberfeld, Glenn Meyers, David Bodner	Investor/Deal	401
CTRL1911271	7/11/11			
CTRL1079684	7/12/11	Murray Huberfeld, David Bodner, Rob Koltun	Deal	401
CTRL2240687				
CTRL1911805	7/18/11	Murray Huberfeld, David Bodner, Rob Koltun	Deal	401
CTRL1079722	8/1/11	Moshe Oratz, Murray Huberfeld, David Bodner	Investor/Deal	401
CTRL2075881	8/1/11	Uri Landesman, David Bodner	PMNY	401
CTRL2122024	8/1/11	Uri Landesman, David Bodner, Mark Nordlicht	PMNY	401
CTRL1079760	9/12/11	Murray Huberfeld, David Bodner, Rob Koltun	Deal	401
CTRL2191409				
CTRL2184546	9/12/11	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1079762				
CTRL1079769	9/19/11	Dr. Alan Cohen, Jack Simony, Uri Landesman, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL1917002	9/21/11	Edward Ho, Murray Huberfeld, David Bodner	PMNY	401
CTRL1917002	9/21/11	David Bodner, Michael Goldberg	PMNY	401
CTRL2098296		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL1810019	9/26/11	David Bodner, Ezra Beren	PMNY	401
CTRL1075195	10/26/11			
CTRL1079806				
CTRL2188468	10/28/11	Glenn Meyers, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL2064780	11/2/11	Mark Nordlicht, David Bodner, Kevin Cassidy	Investor/Deal	401
CTRL2100167	11/2/11	Glenn Meyers, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL2100167	11/2/11	Moshe Oratz, Mark Nordlicht, David Bodner	Investor/Deal	401
CTRL2076296				
CTRL1079819		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL2225179	11/7/11	Mark Nordlicht, Murray Huberfeld, David Bodner, Kevin Cassidy	Partners Meeting	401
CTRL1079862	12/8/11	David Bodner, Murray Huberfeld, Glenn Myers, Sol Werdiger, Reuven Dessler, Jay Schottenstein	Investor/Deal	401
CTRL3160340	1/19/12	Murray Huberfeld, David Bodner, Kushner	Investor/Deal	401
CTRL3160340	1/19/12			
CTRL3160705		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3255903				
CTRL3221749	2/1/12	Howard Crosby, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL3547144	2/1/12	Murray Huberfeld, David Bodner, Rob Koltun	Deal	401
CTRL3161295	2/22/12			
CTRL3161579				
CTRL3548480				
CTRL2348670	2/29/12	Ezra Beren, David Bodner	PMNY	401
CTRL3068437		David Bodner, Uri Landesman, Mark Nordlicht, Murray Huberfeld	Partners Meeting	401
CTRL3162049	3/6/12	David Bodner, Uri Landesman, Mark Nordlicht, Joe Sanfilippo, Robert Kolton	Deal	401
CTRL3549091	3/12/12	Michael Goldberg, David Bodner	PMNY	401
CTRL3147805	3/20/12	David Bodner, Ben Mayer	Deal	401
CTRL3147805	3/20/12	David Bodner, Ezra Beren	PMNY	401
CTRL3147805	3/20/12	David Bodner, Ezra Beren	PMNY	401
CTRL3549640	3/22/12	David Bodner, Ezra Beren	PMNY	401
CTRL3148766	3/29/12	David Bodner, Jack Jaffa, Uri Landesman, Murray Huberfeld	Deal	401
CTRL3148766	3/29/12	David Bodner, Shlomo Kanarek, Isaac Barber, George Karfunkel	Deal	401
CTRL3549815	3/29/12	Ezra Erani, David Bodner, Murray Huberfeld, Uri Landesman	BEOF	401
CTRL3550681		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3550684	4/16/12	Mark Schonfeld, Harvey Werblowsky, Murray Huberfeld, David Bodner, Mark Nordlicht	PMNY	401
CTRL3550786	4/16/12	David Bodner, Uri Landesman	PMNY	401
CTRL3253751	4/19/12	Tzvi Rosenblum, David Bodner	Deal	401
CTRL3550881	4/19/12	David Bodner, Murray Huberfeld, Mark Nordlicht	Partners Meeting	401
CTRL3550908	4/19/12	David Levy, Isaac Barber, David Bodner	PMNY	401
CTRL2354089	4/25/12	David Bodner, Ezra Beren	PMNY	401
CTRL2348824	5/2/12	David Bodner, Ezra Beren	PMNY	401
CTRL2354146	5/2/12	David Bodner, Isaac Barber	PMNY	401
CTRL3551562	5/2/12	Murray Huberfeld, David Bodner, Rob Koltun	Deal	401
CTRL2354678	6/6/12	David Bodner, Isaac Barber, David Levy	Investor/Deal	401
CTRL3082705	6/6/12	David Bodner, David Steinberg	Investor/Deal	401
CTRL3553494				
CTRL3553440		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3553446	6/7/12	Mendy Klein, David Bodner	Deal	401
CTRL3339237	6/18/12	David Bodner, Steve Bayern	Deal	401
CTRL3339237	6/18/12	Jack Kuessous, David Bodner	Deal	401
CTRL3339237	6/18/12	Ben Mayer, Tzvi Rosenblum, David Bodner	Deal	401
CTRL3339336	6/19/12	Ezra Beren, David Steinberg, David Bodner	PMNY	401
CTRL3339336	6/19/12	David Parker, Michael Goldberg, David Bodner	Deal	401
CTRL3339336	6/19/12	Rob Koltun, Murray Huberfeld, Mark Nordlicht, David Bodner	Deal	401
CTRL3339522	6/21/12			
CTRL3563606				
CTRL3285817				
CTRL3339876				
CTRL3564112	6/27/12	David Bodner, Mark Nordlicht, Kevin Cassidy	PMNY	401
CTRL3339876	6/27/12	Michael Goldberg, David Bodner	PMNY	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL3564112	6/27/12	Ralph Zucker, Murray Huberfeld, David Bodner	Deal	401
CTRL3564112	6/27/12	Schmuel Fleishman, Shai Levitan, Brian Jedwab, David Bodner, David Steinberg	Deal	401
CTRL3564112	6/27/12	Michael Goldberg, David Bodner	PMNY	401
CTRL3564112	6/27/12	Ben Mayer, Tzvi Rosenblum, David Bodner	Deal	401
CTRL3564112	6/27/12	Ben Mayer, Tzvi Rosenblum, David Bodner	Deal	401
CTRL3339876	6/27/12	David Bodner, Randy Katzenstein, Morty Mark Nordlicht	Deal	401
CTRL3564385		Marty Loftus, Randy Katzenstein, Aaron Elbogen, Mark Nordlicht, Murray Huberfeld, David Bodner, Bernie Fuchs	Deal	401
CTRL3341270	7/12/12	Fabrice Harari, Murray Huberfeld, David Bodner	Investor	401
CTRL3565032	7/12/12	Fabrice Harari, Murray Huberfeld, David Bodner	Investor	401
CTRL3565689	7/24/12	Steve Bayern, David Bodner	Deal	401
CTRL3565689	7/24/12	Ben Mayer, Tzvi Rosenblum, David Bodner	Deal	401
CTRL3565689	7/24/12	Ezra Beren, David Bodner	PMNY	401
CTRL3565689	7/24/12	George Weinberger, Mr. Fischl, David Bodner	Deal	401
CTRL3565689	7/24/12	Richard Stadtmauer, David Bodner, Murry Huberfeld	Deal	401
CTRL3441859	7/31/12	David Bodner, David Levy	Beechwood	401
CTRL3509914	7/31/12	John Tabbaco, David Bodner, Steven Bayern, Aaron Elbogen, Uri Landesman, Mark Nordlicht	Investor	401
CTRL3566132	8/2/12	David Bodner, Ralph Zucker, Tom Michnewicz, Bill Schroeder, Murray Huberfeld	Deal	401
CTRL3566712		Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3579564	8/13/12	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3343509	8/15/12	David Bodner, Uri Landesman	PMNY	401
CTRL3344553	9/10/12	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3592887	9/10/12	David Bodner, David Levy, Isaac Barber	PMNY	401
CTRL3569009	9/12/12	David Bodner, Ruby Schron, Murray Huberfeld, Sol Menche, Bernie Fuchs	Investor	401
CTRL3569009	9/12/12	Brenda Weiner & David Bodner	PMNY	401
CTRL3569009	9/12/12	David Bodner, Adam Eisenberg, Murray Huberfeld	Deal	401
CTRL3569009	9/12/12	David Bodner, Michael Goldberg	PMNY	401
CTRL3581357	9/20/12	David Bodner, Uri Landesman	Partners Meeting	401
CTRL3401111	10/3/12	Brian Jedwab, David Bodner, Ephraim Schlisser	Investor/Deal	401
CTRL3482983				
CTRL2347681	10/10/12	David Bodner	Partners Meeting	401
CTRL2348040	10/13/12	David Bodner, Murray Huberfeld, Rob Koltun	Deal	401
CTRL2346611	10/16/12	David Bodner, Tzvi Rosenblum	PMNY	401
CTRL3582573	10/17/12	Howard Crosby, David Bodner, Murray Huberfeld, Mr. & Mrs. Chaim Schwartz	Deal Beechwood	401
CTRL3582573				
CTRL3528946	10/17/12	Moshe Oratz, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL3347125				
CTRL3583399	10/22/12	David Bodner, Isaac Barber, Andrew Greene	PMNY	401
CTRL3583395	10/22/12	David Bodner, Fabrice Harari	Investor	401
CTRL3583395	10/22/12	David Bodner, Tzvi, Ben	Deal	401
CTRL2348678	10/23/12	David Bodner, Murray Huberfeld, Mark Nordlicht	Partners Meeting	401
CTRL3572125	10/23/12	David Bodner, Fabrice Harari	Investor	401
CTRL3572125	10/23/12	David Bodner, Tzvi, Ben	Deal	401
CTRL3572125	10/23/12	David Bodner, Isaac Barber, Andrew Greene	PMNY	401
CTRL3347174	10/24/12	Fabrice Harari, Noah Berkowitz, David Bodner	Investor	401
CTRL3347226	10/24/12	Bernie Fuchs, Murray Huberfeld, David Bodner, Jules Nordlicht, Tzachi Even Ari,	Investor	401
CTRL3347312	10/29/12	David Bodner, Richard Stadtmauer	Deal	401
CTRL3347312	10/29/12	David Bodner, Brian Jedwab, Ben Radinsky,	PMNY	401
CTRL3347312	10/29/12	Aaron Greene, Isaac Barber, David Bodner	PMNY	401
CTRL3347312	10/29/12	Ben Mayer, Tzvi Rosenblum, David Bodner	Deal	401
CTRL2347985	11/11/12	Uri Landesman, David Bodner	Partners Meeting	401
CTRL2347987	11/12/12	David Bodner, David Levy	Beechwood	401
CTRL3348059				
CTRL3348140	11/14/12	David Bodner, Rob Koltun, Murray Huberfeld	Deal	401
CTRL3348140	11/14/12	David Bodner, Joe Salvani, Ben Mayer	Deal	401
CTRL3574541	11/15/12	Tzvi Rosenblum, David Bodner	Deal	401
CTRL3574541				
CTRL3584837	11/15/12	Andrew Greene, Isaac Barber, David Bodner	PMNY	401
CTRL3348339	11/19/12	David Bodner, Murray Huberfeld, Richard Stadtmauer	Deal	401
CTRL3584521				
CTRL3348339	11/19/12	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3575389				
CTRL2348191	11/27/12	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL2348243	11/28/12	Brian Jedwab, David Bodner, Ephraim Schlisser	Investor/Deal	401
CTRL3575478	11/28/12	David Bodner, Steve Bayern	Deal	401
CTRL3585817	12/3/12	Bob cohen, Craig Kirsch, Kingsly, Isaac Barber, David Steinberg, Ben Mayer, David	Deal	401
CTRL3585817	12/3/12	Gilad Kalter, David Bodner, Ephraim Schlisser	Investor/Deal	401
CTRL3585817	12/3/12	Brian Jedwab, David Bodner, Ephraim Schlisser	Investor/Deal	401
CTRL3577020	12/17/12	Eliot Lauer, Andrew Levander, Brian Jedwab, Mark Nordlicht, Uri Landesman, Harvey Werblowsky, David Bodner, Murray Huberfeld	PMNY	401, 403
CTRL3587105	12/17/12	Eliot Lauer, Andrew Levander, Brian Jedwab, Mark Nordlicht, Uri Landesman, Harvey Werblowsky, David Bodner, Murray Huberfeld, Dechert	PMNY	401, 403
CTRL3577064	12/18/12	David Bodner, Irwin Katsof	Deal	401
CTRL3577773				
CTRL3350914	12/31/12	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	401
CTRL3628123	1/7/13	David Bodner, Isaac Barber	PMNY	401
CTRL3719222				
CTRL3747113				
CTRL3747147	1/14/13	David Bodner, Mark Nordlicht, Murray Huberfeld, David Ottensoser	PMNY	
CTRL3747459	1/15/13	David Bodner, Aaron Elbogen, Israel Elbogen	Investor/Deal	401
CTRL3630398	1/29/13	David Bodner, Ben Mayer	Deal	401
CTRL3630412				
CTRL3759963				
CTRL3760158	1/31/13	David Bodner, Rob Koltun, Sam Adler	Deal	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL3644933	3/14/13	Mark Nordlicht, David Bodner, Murray Huberfeld, Uri Landesman	Partners Meeting	
CTRL3845831	3/20/13	Murray Huberfeld, Avi Schron, David Bodner	Investor	
CTRL3628872	3/21/13	David Bodner, Isaac Barber	BEOF	401
CTRL3846216	3/21/13	David Bodner, Isaac Barber	PMNY	401
CTRL3846216	3/21/13	David Bodner, Steve Cantor	Deal	401
CTRL3846216	3/21/13	David Bodner, Jonathan Zuckerman, Sam Adler	Beechwood	401
CTRL3846216	3/21/13	Nathan Gold, David Bodner	Deal	401
CTRL3846216 CTRL3692060 CTRL3692772 CTRL3700509 CTRL3692005 CTRL3645899	3/21/13	Uri Landesman, Mark Nordlicht, Murray Huberfeld, David Bodner	Partners Meeting	
CTRL4335192	4/4/13	David Bodner, Isaac Barber	PMNY	401
CTRL3628929	4/8/13	David Bodner, Steve Cantor, Ben Mayer	Deal	401
CTRL3629005	4/15/13	David Bodner, Aaron Elbogen	Investor/Deal	401
CTRL3629040 CTRL3702603 CTRL3702634 CTRL3702720	4/23/13	David Bodner, Rob Koltun, Murray Huberfeld	Deal	401
CTRL3702665 CTRL3691424	4/23/13	David Bodner, Rob Koltun	Deal	401
CTRL3702720	4/23/13	David Bodner, Isaac Barber	PMNY	401
CTRL3702720	4/23/13	David Bodner, Nathan Gold	Deal	401
CTRL3702720	4/23/13	David Bodner, Mr. & Mrs. Ben Mayer	Deal	401
CTRL3702720	4/23/13	David Bodner, Steve Bayern		401
CTRL3702720 CTRL4307501 CTRL3702634 CTRL3702665	4/23/13	Mark Nordlicht, Murray Huberfeld, Uri Landesman, David Bodner	Partners Meeting	
CTRL3629151	4/25/13	David Bodner, Isaac Barber	PMNY	401
CTRL3636443	4/25/13	David Bodner, Aaron Elbogen	Investor/Deal	401
CTRL3695819	4/25/13	Eliot Lauer, Mark Nordlicht, David Bodner	PMNY	401, 403
CTRL3629171	4/28/13	David Bodner, Jack Simony, Harvey Werblowsky	PMNY	401
CTRL3702982	4/29/13	Mark Nordlicht, David Bodner	Partners Meeting	802
CTRL3852377	4/30/13	David Bodner, Aaron Elbogen	Investor/Deal	401
CTRL4315358 CTRL3852377	4/30/13	David Bodner, Jack Simony	PMNY	401
CTRL4466417 CTRL3852377	4/30/13	Eliot Lauer, Mark Nordlicht, David Bodner	PMNY	401, 403
CTRL3629447	5/20/13	David Bodner, Isaac Barber, Mark Nordlicht	PMNY	
CTRL3629529 CTRL4328499	5/23/13	Mark Nordlicht, Murray Huberfeld, David Bodner, Bernard Fuchs	Partners Meeting	
CTRL4413623	5/27/13	Mark Nordlicht, David Levy, Murray Huberfeld, Mark Feuer, Scott Taylor	Beechwood	401
CTRL4336621 CTRL4336621	7/9/13	David Bodner, Isaac Barber, Murray Huberfeld, Mark Nordlicht	PMNY	401
CTRL4336621	7/9/13	David Bodner, Irwin Katsof, Vitaly Pruss	Deal	401
CTRL4336621	7/9/13	David, Moshe Blobstein, Ben Mayer	Deal	401
CTRL4336621	7/9/13	David Bodner, Murray Huberfeld, Mark Nordlicht, Isaac Barber	PMNY	401
CTRL4338680	7/18/13	Leo Ehrlich, David Bodner	Deal	401
CTRL4338680	7/18/13	Ralph Herzka, Murray Huberfeld, David Bodner, Isaac Barber	Deal	401
CTRL4338680	7/18/13	Plus Guests	Deal	401
CTRL4338680	7/18/13	David Bodner, Gilad Katler, Israel Adler	PMNY	401
CTRL4338680	7/18/13	David Bodner, Isaac Barber, Mark Nordlicht	PMNY	401
CTRL4338680	7/18/13	Ralph Herzka, Murray Huberfeld, David Bodner, Isaac Barber	Deal	401
CTRL3690276	7/23/13	Moshe Oratz, David Bodner	Investor/Deal	401
CTRL3690276	7/23/13	Mark Edelstein, Murray Huberfeld, David Bodner	Beechwood	401
CTRL3630343	8/5/13	Brian Jedwab, David Bodner	PMNY	401
CTRL3690669	8/5/13	David Bodner, Isaac Barber	PMNY	401
CTRL3690669	8/5/13	David Bodner, Nathan Gold	Deal	401
CTRL4524221	8/21/13	David Bodner, Mark Nordlicht, Alan Clingman	PMNY	401
CTRL4524221	8/21/13	Noson Hecht, Michael Levy, David Bodner, Murray Huberfeld	Deal	401
CTRL4524221	8/21/13	Rob Koltun, Murray Huberfeld, David Bodner	Deal	401
CTRL4524221	8/21/13	Isaac barber, Murray Huberfeld, David Bodner	PMNY	401
CTRL4524221	8/21/13	David Bodner, Ben Mayer	Deal	401
CTRL4524221	8/21/13	David Bodner, Tzvi Rosenblum	Deal	401
CTRL4524221	8/21/13	Ruby Schron, David Bodner	Deal	401
CTRL3630690	8/26/13	David Bodner, David Steinberg	PMNY	401
CTRL3692648	8/27/13	David Bodner, Mark Nordlicht, Uri Landesman	Partners Meeting	401
CTRL4843067	8/27/13	David Bodner, Mark Nordlicht, Alan Clingman	Deal	401
CTRL3692643	8/28/13	Mark Nordlicht, Uri Landesman, David Bodner	Partners Meeting	
CTRL3631108	9/30/13	David Bodner, Sam Adler	Beechwood	401
CTRL4531196	10/1/13	Ralph Herzka, David Bodner, Richard Stadtmayer	Deal	401
CTRL4531196	10/1/13	Aaron Elbogen, Sruly Elbogen, Murray Huberfeld, David Bodner	Investor/Deal	401
CTRL4531196	10/1/13	Sam Adler, David Bodner	Beechwood	401
CTRL4531196	10/1/13	Mark Nordlicht, Murray Huberfeld, David Bodner	Partners Meeting	
CTRL3694712	10/2/13	Mark Nordlicht, David Bodner, Murray Huberfeld	Partners Meeting	
CTRL4531419	10/2/13	David Weldler, Joe Newman, David Bodner, Murray Huberfeld	Deal	401
CTRL4830630	10/2/13	David Bodner, Sam Adler	Beechwood	401
CTRL3705683	10/8/13	David Bodner, Uri Landesman		
CTRL3705683	10/8/13	David Weldler, Murray Huberfeld, David Bodner	Deal	401
CTRL3705683	10/8/13	David Friedman, David Bodner		401
CTRL3705683	10/8/13	Ben Mayer, David Bodner	Deal	401
CTRL4651544	10/8/13	Uri Landesman, David Bodner	Partners Meeting	
CTRL4736497	10/9/13	Avi Moteshin, David Bodner		401
CTRL4736497	10/9/13	David Bodner, Rob Koltun	Deal	401
CTRL4736497	10/9/13	David Bodner, Bob Cohen	Investor/Deal	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL4736497 CTRL4629147	10/9/13	David Bodner, David Levy	Beechwood	401
CTRL4736497 CTRL4651364	10/9/13	Murray Huberfeld, Kerry Propper, David Bodner, David Levy	PMNY	401
CTRL3716596 CTRL3716601 CTRL4738492	10/17/13	David Bodner, Isaac Barber, Murray Huberfeld, Richard Stadtmauer	Deal	401
CTRL3716643 CTRL4738492	10/17/13	Murray Huberfeld, David Bodner, Mark Nordlicht	Partners Meeting	
CTRL4738827 CTRL3706774 CTRL4603496	10/21/13	Murray Huberfeld, Uri Landesman, David Bodner, Mark Nordlicht	Partners Meeting	
CTRL4715428	10/22/13	Murray Huberfeld, David Bodner, Bernard Fuchs, Shapsie Fuchs, Gilad Kalter, Joe Mann		401
CTRL4667389 CTRL4667405	10/28/13	David Bodner, David Steinberg, Ezra Beren	Deal	401
CTRL3708485	10/29/13	David Bodner, Peter Stamm		401
CTRL3710025	11/11/13	Murray, David, Bernie, Uri		
CTRL3709491	11/12/13	David Bodner, Bernard Fuchs, David Weldler, Shlomo Nehama	Deal	401
CTRL3710023	11/12/13	Uri Landesman, David Bodner, Murray Huberfeld, Bernie Fuchs	Partners Meeting	
CTRL3718505	11/12/13	David Bodner, Murray Huberfeld, Bernard Fuchs, Moshe Fuchs, Aaron Elbogen, Richard Stadtmauer, Jules Nordlicht	Investor/Deal	401
CTRL3632003 CTRL3720150 CTRL3711403	11/26/13	David Bodner, Shlomo Kanerek, Gedaliah Weinberg, Nossou Hecht, Murray Huberfeld, David Steinberg, David Bodner, Ezra Beren	Investor/Deal	401
CTRL3711403	11/26/13	David Bodner, Alan Clingman	Deal	401
CTRL3711403	11/26/13	David Bodner, Richard Stadtmauer, Isaac Barber	Investor/Deal	401
CTRL3711403 CTRL4670006 CTRL4658573 CTRL4812447	11/26/13	David Bodner, Uri Landesman		CTRL4658573 - 802; CTRL4670006 - 802
CTRL3711815	12/2/13	David Bodner, Isaac Barber	PMNY	401
CTRL3711825	12/2/13	David Bodner, Rob Koltun, Murray Huberfeld	Deal	401
CTRL3711825	12/3/13	David Bodner, Uri Landesman	PMNY	401
CTRL4726315	12/5/13	Uri Landesman, Murray Huberfeld, Bernard Fuchs	Partners Meeting	
CTRL3712477	12/9/13	Rob Koltun, David	Deal	401
CTRL3712520	12/9/13	David Bodner, Bob Cohen	Investor/Deal	401
CTRL4856408 CTRL4652658 CTRL3712226 CTRL3712245 CTRL3712477	12/9/13	Murray Huberfeld, David Bodner, Uri Landesman, Mark Nordlicht, Bernie Fuchs	Partners Meeting	
CTRL5678729	1/2/14	David Bodner, Steven Cantor	Deal	401
CTRL5019426 CTRL5163893	1/9/14	David Bodner, Aaron Elbogen, Murray Huberfeld, Israel Elbogen	Investor/Deal	401
CTRL5164244	1/13/14	David Bodner, Murray Huberfeld, Uri Landesman, Mark Nordlicht	Partners Meeting	
CTRL5166103	1/27/14	Ethel, Chaim Schwartz, David Bodner, Murray Huberfeld		401
CTRL5166422	1/29/14	David Bodner, Alan Clingman	Deal	401
CTRL5166671 CTRL5166803 CTRL5166867	2/3/14	David Bodner, Mendy Klein	Investor/Deal	401
CTRL5168263	2/11/14	David Bodner, Dov Weiner, Mark Nordlicht	Investor/Deal	401
CTRL5168263	2/11/14	Richard Stadtmauer, Murray Huberfeld, David Bodner	Deal	401
CTRL5085775	2/18/14	David Bodner, David Weldler, Mark Nordlicht	Deal	401
CTRL6135877	2/18/14	David Bodner, Uri Landesman	PMNY	401
CTRL5169001	2/19/14	David Bodner, RIK Enterprises	Investor/Deal	401
CTRL5169216	2/20/14	David Bodner, Bob Cohen	Investor/Deal	401
CTRL5020040	2/21/14	David Bodner, Motti Edelstein, Mark Nordlicht, Murray Huberfeld	PMNY	401
CTRL5169483	2/25/14	David Bodner, Mark Nordlicht, Murray Huberfeld, Scott Taylor, Moshe Feuer	Beechwood	401
CTRL5169567	2/25/14	Mark Edelstein, David Bodner, Mark Nordlicht, Murray Huberfeld	Beechwood	401
CTRL6221267	2/25/14	David Bodner, David Levy	Beechwood	401
CTRL5169885	2/26/14	Mark Nordlicht, Bob Cohen, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL5171154	3/10/14	Mark Nordlicht, Bob Cohen, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL5171154 CTRL5170820 CTRL5020159	3/10/14	Murray Huberfeld, David Bodner, Uri Landesman, Mark Nordlicht, Bernie Fuchs	Partners Meeting	
CTRL5091506	3/26/14	Richard Stadtmauer, David Bodner	Deal	401
CTRL5173035	3/26/14	Richard Stadtmauer, David Bodner, Murray Huberfeld	Deal	401
CTRL5173324	3/27/14	Bob Cohen, David Bodner, Murray Huberfeld, Mark Nordlicht	Investor/Deal	401
CTRL5091851 CTRL5020491	3/31/14	David Bodner, David Weldler, Mark Nordlicht	Deal	401
CTRL5184170	3/31/14	Mark Nordlicht, Bob Cohen, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL5185097	4/7/14	Irving Langer, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL5185097	4/7/14	Moshe Feuer, David Bodner, Murray Huberfeld	Beechwood	401
CTRL5095815	5/1/14	David Bodner, Ben Mayer	Deal	401
CTRL5095815	5/1/14	Eliezer Becher, David Bodner, Murray Huberfeld	Deal	401
CTRL5095815	5/1/14	David Bodner, Tzvi Rosenblum		401
CTRL5095815	5/1/14	David Bodner, Mosche Pratz		401
CTRL5095815	5/1/14	Steven Cantor, David Bodner, Murray Huberfeld		401
CTRL5095815	5/1/14	David Steinberg, David Bodner		401
CTRL5175309 CTRL6099348	5/1/14	David Bodner, Kerry Propper	PMNY	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL6060067 CTRL5095815	5/1/14	Kerry Propper, Murray Huberfeld, David Bodner		401
CTRL5096039	5/6/14	David Bodner, David Steinberg, Murray Huberfeld, Ezra Beren	PMNY	
CTRL5177036	5/6/14	Mark Edelstein, Murray Huberfeld, David Bodner	Beechwood	401
CTRL5177036	5/6/14	Richard LeVine, Murray Huberfeld, David Bodner		401
CTRL5177036	5/6/14	David Bodner, David Steinberg		401
CTRL6278470	5/6/14	David Bodner, David Steinberg	Beechwood	401
CTRL5096611	5/7/14	Murray Huberfeld, Richard Stadtmayer, David Bodner		401
CTRL5021011	5/12/14	David Bodner, Ezra Beren	PMNY	401
CTRL5097275	5/13/14	Isaac Barber, Michael Katz, Murray Huberfeld, David Bodner, Richard Stadtmayer		401
CTRL5097275	5/13/14	Sol Werdiger, Mark Edelstein, Murray Huberfeld, David Bodner		401
CTRL5097275	5/13/14	Eliezer Becher, Kanak Kapur, David Bodner		401
CTRL5189085	5/13/14	Mendy Kirsch, Jack Wertz, Gab Alexander, David		401
CTRL5189085	5/13/14	Eliezer Becher, Kanak Kapur, David Bodner		401
CTRL5207559 CTRL5098361	5/19/14	David Bodner, Mark Nordlicht, Murray Huberfeld	Partners Meeting	
CTRL5098361	5/20/14	Isaac Benzaquen, Murray Huberfeld, David Bodner, Mark Nordlicht		401
CTRL5098361	5/20/14	Mark Penna, Mark Bahiri, Mark Nordlicht, Murray Huberfeld, David Bodner		401
CTRL5098361	5/20/14	Murray Huberfeld, Mark Nordlicht, David Bodner		
CTRL5180171	5/20/14	Murray Huberfeld, Mark Nordlicht, David Bodner	Partners Meeting	
CTRL5180171	5/20/14	Isaac Benzaquen, Murray Huberfeld, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL5180317	5/21/14	(James Broder) Chuck Rusbasan CEO - Balbec Starwood Capital Murray Huberfeld, David Bodner, Mark Nordlicht		401
CTRL5180317	5/21/14	Barry Mannis Munis-Samuel Capital Management LLC, Murray Huberfeld, Mark Nordlicht, Stewart Kim, David Bodner		401
CTRL5180317	5/21/14	Barry Mannis (Munis-Samuel Capital Management LLC), Murray Huberfeld, Mark Nordlicht, Stewart Kim, David Bodner	Investor/Deal	401
CTRL5180317 CTRL5180330	5/21/14	Chuck Rusbasan (Balbec Starwood Capital) Murray Huberfeld, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL5180372	5/21/14	Shuky Barlev-Ehrenberg, David Bodner, Mark Nordlicht, Murray Huberfeld	Investor/Deal	401
CTRL5207567	5/21/14	Dov Gertzulin, Murray Huberfeld, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL5099399	5/27/14	Barry Kostiner, Mark Nordlicht David Bodner		401
CTRL5099399	5/27/14	Shabse with Omek capital, Murray, David Bodner		401
CTRL5099399	5/27/14	David Welder, Murray Huberfeld, Mark Nordlicht, David Bodner		401
CTRL5099399	5/27/14	Dov Gertzulin, Murray Huberfeld, David Bodner, Mark Nordlicht		401
CTRL5180995	5/27/14	David Welder, David Bodner, Mark Nordlicht, Murray Huberfeld	Investor/Deal	401
CTRL5180995	5/27/14	Dov Gertzulin, Murray Huberfeld, David Bodner, Mark Nordlicht	Investor/Deal	401
CTRL5181300	5/28/14	Isaac Barber, David Bodner		401
CTRL5181300	5/28/14	Danny Saks, David Bodner, Murray Huberfeld		401
CTRL5181300	5/28/14	Steven Cantor, David Bodner		401
CTRL5181300	5/28/14	David Bodner, Isaac Barber	PMNY	401
CTRL5181300	5/28/14	David Bodner, Steven Cantor	Investor/Deal	401
CTRL5181300	5/28/14	David Bodner, Danny Saks, Murray Huberfeld	Beechwood	401
CTRL5021473	6/17/14	David Bodner, Sam Adler	Beechwood	401
CTRL5184502	6/17/14	David Bodner, Bernard Fuchs, Uri Landesman, Danny Saks, Mark Nordlicht, Murray Huberfeld	PMNY	401
CTRL6240748	6/17/14	David Bodner, David Levy, Isaac Barber, Michael Katz	PMNY	401
CTRL5184828	6/19/14	David, Joe Salvani		401
CTRL5184828	6/19/14	David, Shaya Segal		401
CTRL5184828	6/19/14	David, Abe Biderman		401
CTRL5184828	6/19/14	David, Ben Babad, Sandra Parnes and her daughter		401
CTRL5185419	6/23/14	David Bodner, Bob Cohen	Investor/Deal	401
CTRL5184679 CNOCSL_01118793	6/24/14	David Bodner, Mark Nordlicht, Murray Huberfeld, Scott Taylor, Moshe Feuer	Beechwood	401
CTRL5185654	6/24/14	Berni, Uri, Danny Saks, Murray, David Bodner, Mark Nordlicht		401
CTRL5185654	6/24/14	David, Itchy, Joe Salvani, Brian		401
CTRL5185654 CNOCSL_01125257	6/24/14	Mark, Moshe Feuer, Scott Taylor, Murray, David Bodner		401
CTRL5185657 CTRL5184442 CTRL5102436 CTRL5101639	6/24/14	Bernard Fuchs, Uri Landesman, Danny Saks, Murray Huberfeld, David Bodner, Mark Nordlicht	Partners Meeting	
CTRL5187268	6/30/14	David Bodner, Sam Adler	Beechwood	401
CTRL5187340		David Bodner, Bob Cohen, Brian Jedwab, Ben Mayer, Itchy Bodner, Joel Salvani	Deal	401
CNOCSL_01317687 CTRL6081298	7/2/14	David Bodner, Mark Nordlicht, Irwin Katsof	Investor/Deal	401
CNOCSL_01317652	7/8/14	David Bodner, Mark Nordlicht, Bobby Orbach, Itchy Bodner	Investor/Deal	401
CTRL4900684	7/14/14	David Bodner, Bobby Orbach	Investor/Deal	401
CTRL4904544 CTRL5188829 CTRL4905351 CTRL4909700	7/16/14	David Bodner, Irwin Katsof, Dr. Boruch Goldstein, Donald Clark, David Steinberg, Yaakov Bodner	Investor/Deal	401
CTRL4909700	7/16/14	David, David Steinberg, Yaakov Bodner, Bobby Ohrbach, Irwin Katsof, Donald Clark, Dr Boris Goldstein		401
CTRL4909700	7/16/14	David, Murray, Irwin, Dr Goldstein, Donald Clark		401
CTRL4909700	7/16/14	David, David Steinberg		401
CTRL4909700	7/16/14	Kevin Swill, David Bodner		401
CTRL4909700	7/16/14	Brian Jedwab, Murray, David Bodner		401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL5066397	7/16/14	David Bodner, Murray Huberfeld, Brian Jedwab	PMNY	401
CTRL5070786	7/17/14	David Bodner, Robert Koltun	Deal	401
CTRL5067767	7/18/14	David Bodner, Richard Stadtmauer, Isaac Barber	Investor/Deal	401
CTRL5075737	7/21/14	Bob Cohen, David Bodner, Murray Huberfeld		401
CTRL5189615	7/21/14	Bob Cohen, David Bodner, Murray Huberfeld		401
BW-SHIP-00966426	7/29/14	David Bodner, Kerry Propper, David Levy	Beechwood	401
CTRL5077560				
CTRL5189745	7/29/14	David Bodner, Bob Cohen, Murray Huberfeld	Investor/Deal	401
CTRL5190926	7/29/14	Bob Cohen, David Bodner, Murray Huberfeld		401
CNOCSL_01263218				
CTRL5190998	7/30/14	David Bodner, David Levy, Kerry Propper, Itchy Bodner	Beechwood	401
CTRL5190003				
CTRL5191174	7/30/14	Bobby Orbach, Irwin Katsof, David Bodner, Yaakov Bodner	Investor/Deal	401
		David Bodner, Simi Weber, Mark Nordlicht, Murray Huberfeld		401
CTRL5191174	7/30/14	David, Irwin@katsofenergy.com		401
CTRL5191174	7/30/14	Dror Wilf, Boris Goldstein, David Steinberg, David Bodner, Murray Huberfeld	Investor/Deal	401
CTRL5191174	7/30/14	David Bodner, Potbotics	Investor/Deal	401
CTRL6211713	8/12/14	David Bodner, Uri Landesman	PMNY	401
CTRL6211747	8/12/14		PMNY	401
CTRL6385279	8/19/14	David Bodner, Mark Nordlicht	Partners Meeting	802
CTRL6385279	8/21/14	David Bodner, Mark Nordlicht	Partners Meeting	802
CTRL4953409	9/2/14	Nikolaos Koklonis, David Bodner, Murray Huberfeld, David Steinberg, Murray Huberfeld, Ezra Beren	Deal	401
CTRL4954193	9/2/14	David Bodner, Mark Nordlicht, Murray Huberfeld, Scott Taylor, Moshe Feuer	Beechwood	401
CTRL4955521	9/3/14	Mark Nordlicht, David Bodner, Murray Huberfeld	Partners Meeting	
CTRL4957284	9/8/14	David Bodner, Mark Edelstein	Beechwood Deal	401
CTRL4978072	9/8/14	Steven Cantor, David Bodner	Deal	401
CTRL4978398	9/8/14	David Bodner, Mark Edelstein	Beechwood	401
CTRL4978466	9/8/14	David Bodner, Gilad Kalter	PPCO	401
CTRL4954204	9/9/14	David Bodner, Mark Nordlicht, Murray Huberfeld, Scott Taylor, Moshe Feuer	Beechwood	401
CTRL4978341	9/9/14	Amir Jaffe, David Bodner	Deal	401
CTRL4996494				
CTRL4996528				
CTRL5013119	9/11/14	David Bodner, Michael Goldberg	PMNY	401
CTRL5011105				
CTRL4996995	9/15/14	David Bodner, Michael Katz	PMNY	401
CTRL5015137	9/16/14	Craig Kirsch, Murray Huberfeld, David Bodner	Deal	401
CTRL4993425	9/18/14	Craig Kirsch, Murray Huberfeld, David Bodner	Deal	401
CTRL5091884				
CTRL5234227	9/18/14	Aaron Elbogen, David Bodner, Mike Frogel, Yael Porat, Leo Ehrlich, Jacob Elbogen, Israel Elbogen, Dr. Flueger	Deal	401
CTRL5235997	9/18/14	David Bodner, Isaac Barber	PMNY	401
CTRL5245088	9/18/14	Motti Deringfeld, Murray Huberfeld, David Bodner		401
CTRL5249792	9/21/14	David Bodner, Mendy Klein	Investor/Deal	401
BW-SHIP-00948907	9/22/14	Mark Nordlicht, David Bodner, David Levy	Beechwood	401
CTRL5244100	9/22/14	Abe Solof, David Bodner, Ari Margulies, Murray	Deal	401
CTRL5252740	9/22/14	Howard Crosby, Murray Huberfeld, David Bodner		401
CTRL5254488	9/25/14	Gilad Kalter, David Bodner	PMNY	401
CTRL5267194				
CTRL5265186	9/29/14	David Bodner, Stewart Kim, Uri Landesman	PMNY	401
CTRL5285801	10/1/14	David Bodner, Mayer Offman	Deal	401
CTRL5718481	10/21/14	David Levy, Mark Nordlicht, Bernard Fuchs, Uri Landesman, Gilad Kalter	Partners Meeting	401
CTRL5719999	10/22/14	Harvey Werblowsky, Ben Mayer, Howie Feder, David Bodner, (Maybe) Murray Huberfeld	Deal	401
CTRL5720028	10/22/14	Greg Shlionsky, Naftali Manela, Stewart Kim, David Bodner (Maybe) Murray Huberfeld	Investor/Deal	401
CTRL5723503	10/23/14	David Bodner, Mayer Offman	Deal	401
CTRL5743717	10/27/14	David Bodner, Murray Huberfeld, Eli Becher	Beechwood	401
CTRL5733260	10/28/14	David Bodner, Uri Landesman, Stewart Kim	PMNY	401
CTRL5744872	10/28/14	David Bodner, Kevin Cassidy, Aaron Schiff	Investor/Deal	401
CTRL5745391	10/28/14	David Bodner, Ben Mayer	Deal	401
CTRL5764562	10/30/14	David Bodner, Robert Koltun	Deal	401
CTRL5782044	11/4/14	David Bodner, Mark Nordlicht	PMNY	802
BW-SHIP-01016367	11/6/14	David Bodner, Mark Nordlicht, Mark Nordlicht, Eli Becher	Investor/Deal	401
CNOCSL_01615286	11/6/14	David Bodner, Mark Nordlicht, Murray Huberfeld, Eli Becher	PMNY	401
CTRL5791572	11/6/14	David Bodner, Ben Mayer	Deal	401
CTRL5791600	11/6/14	Mark Nordlicht, Itchy Bodner, David Steinberg, Sruly Weinberg	PMNY	401
CTRL5883850	11/25/14	Jonathan Freedman, David Bodner	Beechwood	401
CTRL5907145				
CTRL5907247	12/4/14	David Bodner, Mark Nordlicht, Isaac Barber, Michael Katz	PMNY	401
CTRL5907247	12/4/14	David Bodner, Howie Feder	Investor/Deal	401
CTRL5959659	12/15/14	David Bodner, Brian Jedwab, Kevin Cassidy, Steven Rosenblum	Agera	401
CTRL5962188	12/16/14	David Bodner, David Weldler		401
ALB0000704				
CTRL6426666	1/7/15	David Bodner, Danny Saks	Beechwood	401
CTRL6426444	1/7/15	David Bodner, Mark Nordlicht	Partners Meeting	
CTRL7146680	1/22/15	David Bodner, Brian Jedwab	Deal	401
AN013441	2/3/15	David Bodner, Murray Huberfeld, Irving Langer	Beechwood	401
BW-SHIP-01071113	3/2/15	David Bodner, Danny Saks	Beechwood	401
CTRL6701066	4/16/15	David Bodner, Robert Koltun	Deal	401
CTRL6769831	5/1/15	David Bodner, Alan Clingman	Deal	401
CTRL6795011	5/7/15	David Bodner, Alan Clingman, Wolfson	Deal	401
CTRL6815286				
CTRL6819124	5/12/15	David, Murray Huberfeld, Mark Nordlicht	Partners Meeting	
CTRL6818035	5/13/15	David Bodner, Robert Koltun	Deal	401
CTRL6918114	6/2/15	David Bodner, Hepzi Schechter	Deal	401

CTRL Number	Meeting Date	Attendees	Type of Meeting	Objections
CTRL6970761	6/17/15	Mark Nordlicht, David Bodner, Murray Huberfeld, Bernard Fuchs	Partners Meeting	
CTRL7086178	7/21/15	David Bodner, Robert Koltun	Deal	401
CTRL7386306	10/19/15	Half day meeting at Nordlicht apartment	Partners Meeting	
CTRL7423849	10/20/15	Uri Landesman, David Levy, Bernie Fuchs, Murray Huberfeld, Kerry Propper, David Bodner		401
CTRL7434215	10/25/15	Uri Landesman, Murray Huberfeld, Bernard Fuchs, Bernie Fuchs, Mark Nordlicht	Partners Meeting	
CTRL7517117	11/18/15	Brian Jedwab, David Bodner	PMNY	401
CTRL7578507	12/11/15	Mark Nordlicht, David Bodner		
CTRL7604849	12/21/15	Mark Nordlicht, Uri Landesman, Bernard Fuchs, Kerry Propper, Antonio, David Levy, David Bodner, Murray Huberfeld, Andrew Kaplan		401
CTRL8014908	1/16/16	David Levy, Murray, David B, Uri, Bernie F	Partners Meeting	
BW-SHIP 917345	2/8/16	David Bodner, Mark Feuer		401
BW-SHIP-00917440	2/22/16	David Bodner, Mark Feuer, Charles Kushner	Beechwood	401
CTRL8328893	3/14/16	Mark Nordlicht, Bernard Fuchs, Noemi Morales	Partners Meeting	
CTRL7836252	4/19/16	Chip Weissmiller, George Karfunkel, David Bodner, Randy Johnson, Aaron Perker, Lipa Fisher, lbarber@lumensenergy.com	Deal	401

EXHIBIT C

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 1	May 11, 2012 Black Elk Energy Offshore Operations Form 8-K	Publicly Filed, not on Server	2012-05-11	Black Elk	
DX 2	November 13, 2012 Black Elk Energy Form 10-Q	CTRL4388331	2012-11-13	Black Elk	
DX 3	April 15, 2013 Black Elk Energy Offshore Operations Form 10-K	CTRL4467631	2013-04-15	Black Elk	
DX 4	May 15, 2013 Black Elk Form 10-Q	PPVA_RH_0659797	2013-05-15	Black Elk	
DX 5	August 6, 2013 Black Elk Energy Offshore Operations Form 8-K	Publicly Filed, not on Server	2013-08-06	Black Elk	
DX 6	August 21, 2013 Black Elk Energy Offshore Operations Form 8-K	CTRL4721830	2013-08-21	Black Elk	
DX 7	September 20, 2013 Black Elk Energy Offshore Operations Form 8-K	CTRL4774908	2013-09-20	Black Elk	
DX 8	November 14, 2013 Black Elk Energy Offshore Operations Form 10-Q	Publicly Filed, not on Server	2013-11-14	Black Elk	
DX 9	November 20, 2013 Black Elk Energy Offshore Operations Form 8-K	CTRL4764965	2013-11-20	Black Elk	
DX 10	Email from Mark Nordlicht to Joe SanFilippo, dated February 3, 2014	CTRL6079964	2014-02-03	Black Elk	
DX 11	July 16, 2014 Black Elk Form 8-K	CTRL4908797	2014-07-16	Black Elk	
DX 12	August 14, 2014 Black Elk Form 8-K	CTRL6387144	2014-08-14	Black Elk	
DX 13	August 21, 2014 Black Elk Form 8-K	PPVA_RH_0688757	2014-08-21	Black Elk	
DX 14	November 19, 2014 Black Elk Form 10-Q	CTRL8966851	2014-11-19	Black Elk	
DX 15	March 25, 2015 Black Elk Form 8-K	C-PLAT-00040059 - CONFIDENTIAL	2015-03-25	Black Elk	
DX 16	March 31, 2015 Black Elk Form 10-K	CTRL3461107	2015-03-31	Black Elk	
DX 17	Order in <i>United States v. Nordlicht et al.</i> , No. 16-cr-00640 (BMC) (E.D.N.Y. June 17, 2019)		2019-06-17	Black Elk	Hearsay
DX 18	Bart Schwartz Guidepost Bio	https://guidepostsolutions.com/our-people/bart-m-schwartz/	2016-06-30	Guidepost	Hearsay; Relevance
DX 19	Letter from M. Nordlicht to PPLO Shareholders	CTRL8595959	2016-06-30	Guidepost	Relevance; Hearsay
DX 20	Letter from M. Nordlicht to PPVA International Shareholders	CTRL8575697	2016-06-30	Guidepost	Relevance; Hearsay
DX 21	Letter to PPVA USA Partners from PPVA	CTRL8575698	2016-06-30	Guidepost	Hearsay; Relevance
DX 22	Guidepost engagement letter	PPVA_RH_0037961	2016-07-18	Guidepost	Relevance; Hearsay
DX 23	Letter from Bart Schwartz to investors	CTRL8125633	2016-07-20	Guidepost	Hearsay; Relevance
DX 24	Media Talking Points Re GP Investor Letter	CTRL8125909	2016-07-20	Guidepost	Hearsay; Relevance
DX 25	Draft Investor Letter from M. Nordlicht	CTRL8137454	2016-07-28	Guidepost	Hearsay; Relevance
DX 26	Draft Investor Letter from M. Nordlicht	CTRL8138322	2016-07-29	Guidepost	Hearsay; Relevance
DX 27	Draft Investor Letter from M. Nordlicht	CTRL8140430	2016-08-01	Guidepost	Hearsay; Relevance
DX 28	Email from David Steinberg with subject: "Re: Heartland Bank, Senior Lender to Platinum Partner Funds"	CTRL8687975	2016-08-05	Guidepost	Hearsay; Relevance
DX 29	Email from M. Nordlicht to investors about Guidepost	CTRL8385741	2016-08-15	Guidepost	Hearsay; Relevance
DX 30	Letter to B. Schwartz from M. Wright	CTRL8392123	2016-09-14	Guidepost	Hearsay; Relevance
DX 31	Investor Letter to Judge Irizarry	ECF No. 177, 1:16-cv-06848-DLI-VMS	2017-06-26	Guidepost	Hearsay; Relevance
DX 32	[placeholder] Guidepost related communications to investors, engagement letters			Guidepost	Hearsay, failure to specifically identify exhibits; failure to disclose; Relevance
DX 33	[placeholder] Guidepost Reports to SEC			Guidepost	Hearsay, failure to specifically identify exhibits; failure to disclose; Relevance
DX 34	Letter to PPVA USA Investors from B. Schwartz	CTRL8392122		Guidepost	Hearsay
DX 35	Email from Fabrice Harari to M. Nordlicht, Subject: Redemption Orders	Huberfeld Dep. Ex. 698	2015-12-14	Liquidity	
DX 36	Email from M. Nordlicht to N. Manela, no subject	CTRL7733370	2016-01-07	Liquidity	Hearsay
DX 37	Emails among M. Liu, A. Kaplan, and others, Jan. 7, 2016	CTRL7735478	2016-01-07	Liquidity	Hearsay
DX 38	David Steinberg Ex 470 - January 8, 2016 Email from David Steinberg with subject: "Re: Platinum Partners deck"	CTRL7736296	2016-01-08	Liquidity	
DX 39	Email from M. Kimelman to M. Nordlicht, D. Levy, FW: Platinum, forwarding email from M. Leben	CTRL8015373, Fuchs Dep. Ex. 150, Tab 34	2016-01-15	Liquidity	
DX 40	Emails among A. Kaplan, S. Horowitz, J. Mann, and others, Feb. 19, 2016	CTRL8251116	2016-02-19	Liquidity	Hearsay
DX 41	Emails among S. Horowitz, D. Steinberg, A. Finkelman, and others, Dec. 15, 2015 through Apr. 19, 2016	CTRL8551564	2016-04-19	Liquidity	Relevance; Hearsay
DX 42	Jan. 28, 2016 email from Andrew Kaplan to Suzanne Horowitz, Joe Mann, David Ottensoser, FW: CASH MISSING	CTRL8184802	2016-01-28	Liquidity	Hearsay
DX 43	SS&C Technologies, Inc. Fund Administration Services Agreement, dated May 4, 2007	CTRL2005921	2007-05-04	No Role in Creating NAVs or Setting Valuations	Relevance
DX 44	Platinum Partners Valuation Policy (Update Approved 5/24/2010)	CTRL0698420	2010-05-24	No Role in Creating NAVs or Setting Valuations	
DX 45	Platinum Partners Valuation Policy (Update Approved 6/2/2010)	CTRL0623774	2010-06-02	No Role in Creating NAVs or Setting Valuations	
DX 46	Platinum Partners Valuation Policy (Update Approved 7/15/2010)	CTRL0718339	2010-07-15	No Role in Creating NAVs or Setting Valuations	
DX 47	Platinum Partners Valuation Policy (Update Approved 9/5/2010)	CTRL0594755	2010-09-05	No Role in Creating NAVs or Setting Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 48	Platinum Partners Valuation Policy (Update Approved 12/22/2010)	CTRL0594948	2010-12-22	No Role in Creating NAVs or Setting Valuations	
DX 49	Platinum Partners Valuation Policy (Update Approved 12/29/2010)	CTRL1967135	2010-12-29	No Role in Creating NAVs or Setting Valuations	
DX 50	"Platinum Partners Valuation Policy 2014"	CTRL5900819	2011-07-06	No Role in Creating NAVs or Setting Valuations	
DX 51	Platinum Partners Valuation Policy – Update Approved 7/6/2011	CTRL8419482	2011-07-06	No Role in Creating NAVs or Setting Valuations	
DX 52	Platinum Partners Valuation Policy (Update Approved 7/6/2011)	CTRL3203104	2011-07-06	No Role in Creating NAVs or Setting Valuations	
DX 53	Platinum Partners Valuation Policy (Update Approved 7/6/2011)	CTRL3559760	2011-07-06	No Role in Creating NAVs or Setting Valuations	
DX 54	Platinum Partners Valuation Policy (Update Approved 11/19/2012)	CTRL4357756	2012-11-19	No Role in Creating NAVs or Setting Valuations	
DX 55	Platinum Partners Valuation Policy (Update Approved 11/26/2012)	CTRL8943498	2012-11-26	No Role in Creating NAVs or Setting Valuations	
DX 56	Platinum Partners Value Arbitrage Fund December 2012 Slide Deck	CTRL3416857	2012-12-01	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 57	January 24, 2013 Calendar Invite from Joseph SanFilippo for a Valuation Committee Meeting between PPVA and Sterling	CTRL4493249	2013-01-24	No Role in Creating NAVs or Setting Valuations	
DX 58	January 24, 2013 Email from Joseph SanFilippo with subject: "Valuation Committee Meeting" (without attachments)	CTRL3630638	2013-01-24	No Role in Creating NAVs or Setting Valuations	Hearsay (as to attachments)
DX 59	Valuation Committee Meeting Minutes, January 24, 2013	CTRL4493608	2013-01-24	No Role in Creating NAVs or Setting Valuations	
DX 60	March 11, 2013 Email from Zach Weiner with subject: "Valuation Committee"	CTRL4560145	2013-03-11	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 61	Spreadsheet titled "Platinum Valuations 3-31-13 Exhibit"	CTRL4657797	2013-03-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 62	April 24, 2013 Email from Will Slota with subject: "FW: 12/31 Final Opinion"	CTRL4506437	2013-04-24	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 63	August 4, 2013 Email from Mae Fu with subject: "3/31 Final Letter"	CTRL4657795	2013-08-04	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 64	October 29, 2013 Email from Zach Weiner with subject: "Valuation Committee Meeting"	CTRL4823126	2013-10-29	No Role in Creating NAVs or Setting Valuations	
DX 65	October 30, 2013 Email from Joseph SanFilippo to Zach Weiner with subject: "September 30th File with Supplemental Reports"	CTRL4794378	2013-10-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 66	October 30, 2013 Email from Marina Fedotova to Zach Weiner with no subject	CTRL4636787	2013-10-30	No Role in Creating NAVs or Setting Valuations	
DX 67	October 30, 2013 Email from Zach Weiner to Marina Fedotova with no subject	CTRL4700830	2013-10-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 68	Spreadsheet titled "BE Model 9-30-13"	CTRL4794379	2013-10-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 69	Spreadsheet titled "GGO Model 9-30-13"	CTRL4794380	2013-10-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 70	Spreadsheet titled "September 30 Marks"	CTRL4700831	2013-10-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 71	October 31, 2013 Email from Joseph SanFilippo to Maggie Muller with subject: "sep 30 marks presentation ppva (3).xlsx"	CTRL4685751	2013-10-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 72	Spreadsheet titled "sep 30 marks presentation ppva (3)"	CTRL4685752	2013-10-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 73	December 11, 2013 Email from Fazle Choudhury with subject: "Platinum Partners Planning Meeting – Level 3 Valuation Rescheduled to 12/12/13 @ 1 pm"	CTRL4758972	2013-12-11	No Role in Creating NAVs or Setting Valuations	
DX 74	Platinum Partners Valuation Meeting Agenda	CTRL4758974	2013-12-12	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 75	Spreadsheet titled "Attachment A – Investments Portfolio (Level 3)"	CTRL4758973	2013-12-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 76	February 6, 2014 Email from Joel Edelstein with subject "Valuation Committee Minutes Feb 6 14" and attachment	CTRL5215839	2014-02-06	No Role in Creating NAVs or Setting Valuations	Relevance
DX 77	Platinum Credit Management LP Valuation Committee Meeting Minutes, February 6, 2014	CTRL5215840	2014-02-06	No Role in Creating NAVs or Setting Valuations	Relevance
DX 78	February 17, 2014 Email from Joseph SanFilippo with subject: "FW:" (content is Black Elk/GGO adjustment)	CTRL6269148	2014-02-17	No Role in Creating NAVs or Setting Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 79	March 10, 2014 Email from Mark Nordlicht with subject: "Re: RE:" (content is methodology of GGO and Black Elk valuation)	CTRL6105699	2014-03-10	No Role in Creating NAVs or Setting Valuations	
DX 80	March 26, 2014 Email from Daniel Saks with subject: "Re: RE:" (content is Black Elk strategic plan)	CTRL6295919	2014-03-26	No Role in Creating NAVs or Setting Valuations	
DX 81	PPVA First Quarter 2014 Valuation Report	CTRL5659829	2014-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 82	Platinum Partners Valuation Policy (Update Approved 7/10/2014)	CTRL5227477	2014-07-10	No Role in Creating NAVs or Setting Valuations	
DX 83	Minutes of a valuation committee meeting on July 24, 2014	CTRL4941593	2014-07-24	No Role in Creating NAVs or Setting Valuations	
DX 84	PPVA PPLO Valuation Meeting Minutes, Q2 2014	CTRL5772986	2014-07-24	No Role in Creating NAVs or Setting Valuations	
DX 85	December 15, 2014 Email from Joseph SanFilippo with subject: "GGO-Q3 Purchase from Amrich." Attachments: GGO PSA Executed – August 14, 2014; Lieberman Letter Signed – August 6, 2014; August 22, 2014 Email from Michael Kimelman with subject: "FW: WIRE INSTRUCTIONS TO Amrich Share Purchase Agreement"	CTRL8407695 (with attachments)	2014-08-22	No Role in Creating NAVs or Setting Valuations	
DX 86	August 28, 2014 Email from Will Slota with subject: "RE: Request List 6" and attached minutes of valuation committee meeting	CTRL4941592	2014-08-28	No Role in Creating NAVs or Setting Valuations	
DX 87	September 3, 2014 Email from Naftali Manela with subject: "Monthly Valuation Process – DRAFT – ATTY CLIENT PRIVILEGE"	CTRL4958131	2014-09-03	No Role in Creating NAVs or Setting Valuations	
DX 88	September 7, 2014 Email from Eli Rakower with subject: "RE: Investment reporting"	CTRL4975828	2014-09-07	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 89	September 17, 2014 Email from Eli Rakower with subject: "Re: New email distribution list"	CTRL5233682	2014-09-17	No Role in Creating NAVs or Setting Valuations	
DX 90	October 3, 2014 Email from Mae Fu, Sterling, with subject: "PPVA 3/31/14 Final report"	CTRL5659828	2014-10-03	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 91	October 6, 2014 Email from Mae Fu with subject: "PPVA 3/31/14 – comments addressed"	CTRL5672364	2014-10-06	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 92	Platinum Partners Valuation Policy (Update Approved 10/27/2014)	CTRL5743508	2014-10-27	No Role in Creating NAVs or Setting Valuations	
DX 93	October 28, 2014 Email from Eli Rakower with subject: "FW: Report updates"	CTRL5747857	2014-10-28	No Role in Creating NAVs or Setting Valuations	
DX 94	October 28, 2014 Email from Eli Rakower with subject: "RE: Report updates"	CTRL5747703	2014-10-28	No Role in Creating NAVs or Setting Valuations	
DX 95	October 28, 2014 Email from Joseph SanFilippo with subject: "Valuation Meeting Listing Request 16-13.xlsx"	CTRL5762440	2014-10-28	No Role in Creating NAVs or Setting Valuations	
DX 96	Spreadsheet titled "Valuation Meeting Listing Request 16-13."	CTRL5762441	2014-10-28	No Role in Creating NAVs or Setting Valuations	
DX 97	October 29, 2014 Email from Eli Rakower with subject: "FW: Report updates"	CTRL5766047	2014-10-29	No Role in Creating NAVs or Setting Valuations	
DX 98	"PPVA Valuation Meeting Minutes – Q3 2014"	CTRL5870857	2014-11-04	No Role in Creating NAVs or Setting Valuations	
DX 99	Calendar Invite from Karen Lau with subject: "PPVA Q3 Sterling Valuation Meeting"	CTRL5766140	2014-11-04	No Role in Creating NAVs or Setting Valuations	
DX 100	December 1, 2014 Email from George Duch with subject: "As Requested"	CTRL5900818	2014-12-01	No Role in Creating NAVs or Setting Valuations	
DX 101	Document titled "(MISC-8) PPLO & PPVA Narratives Memo 2014"	CTRL6535837	2014-12-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 102	Spreadsheet titled "PPVA Feb 2015 Position summary"	CTRL6586220	2015-02-01	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 103	Platinum Partners Valuation Policy (Update Approved 2/5/2015)	CTRL8960481	2015-02-05	No Role in Creating NAVs or Setting Valuations	
DX 104	Platinum Credit Management LP Valuation Committee Meeting Minutes, February 12 2015	CTRL6586756	2015-02-12	No Role in Creating NAVs or Setting Valuations	
DX 105	Spreadsheet titled "PPVA March 2015 Summary Position Valuation Analysis"	CTRL6855146	2015-03-01	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 106	March 13, 2015 Email from George Duch with subject: "(MISC-8) PPLO & PPVA Narratives Memo 2014"	CTRL6535836	2015-03-13	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 107	March 24, 2015 Email from Marina Fedotova with subject: "RE: 9/30 Pedevco Draft"	CTRL6583974	2015-03-24	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 108	March 25, 2015 Email from Eli with subject "RE: Platinum Q1 2015 Valuation Committee Meeting"	CTRL6586217	2015-03-25	No Role in Creating NAVs or Setting Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 109	Platinum Credit Management LP Q4 2014 Valuation Committee Minutes, March 25, 2015	CTRL6742038	2015-03-25	No Role in Creating NAVs or Setting Valuations	Relevance
DX 110	Platinum Management (NY) LLC Risk Committee – 3/26/2015	CTRL8022381	2015-03-26	No Role in Creating NAVs or Setting Valuations	
DX 111	Platinum Partners Valuation Policy (Update Approved 4/9/2015)	CTRL8413177	2015-04-09	No Role in Creating NAVs or Setting Valuations	
DX 112	April 13, 2015 Email from Marina Fedotova with subject: "PPVA 9/30 Final Opinion"	CTRL6681534	2015-04-13	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 113	May 21, 2015 Email from Eli Rakower with subject: "2pm TODAY – March 2015 – Sterling Valuation Meeting"	CTRL6855144	2015-05-21	No Role in Creating NAVs or Setting Valuations	
DX 114	June 12, 2015 Email from Marina Fedotova with subject: "12/31 Final Opinion"	CTRL6963499	2015-06-12	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 115	June 14, 2015 Email from Marina Fedotova with subject: "Revised PPVA 3/31 Final Opinion"	CTRL7074277	2015-06-14	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 116	Document titled PPVA EXHIBIT A 12-31-1 v2"	CTRL6970415	2015-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 117	June 16, 2015 Email from George Duch with subject: "FW: 12/31 Final Opinion"	CTRL6970681	2015-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 118	June 16, 2015 Email from Joseph SanFilippo with subject: "FW: 12/31 Final Opinion"	CTRL6970619	2015-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 119	June 16, 2015 Email from Mae Fu, Sterling, with subject: "RE: 12/31 Final Opinion"	CTRL6970414	2015-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 120	June 16, 2015 Email from Marina Fedotova with subject: "RE: Platinum Appendix XXV – Oil and Gas 12-31-14 Final v3_PP Comments"	CTRL6971313	2015-06-16	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 121	Platinum Partners Valuation Policy (Update Approved 6/17/2015)	CTRL8969802	2015-06-17	No Role in Creating NAVs or Setting Valuations	
DX 122	Document titled "2015 Q2 Valuation Meeting Agenda"	CTRL6992971	2015-06-22	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 123	June 22, 2015 Email from Eli Rakower with subject: "Q2 2015 Valuation Meeting"	CTRL6992970	2015-06-22	No Role in Creating NAVs or Setting Valuations	
DX 124	June 24, 2015 Email from Eli Rakower with subject: "FW: Q2 2015 Valuation Meeting"	CTRL7005735	2015-06-24	No Role in Creating NAVs or Setting Valuations	
DX 125	Platinum Credit Management LP Q2 2015 Valuation Committee Meeting Minutes – June 24, 2015	CTRL7288859	2015-06-24	No Role in Creating NAVs or Setting Valuations	Relevance
DX 126	Document titled "Platinum Opinion Cover Letter 6-30-15 Final (all)"	CTRL7425313	2015-06-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 127	Document titled "PPVA EXHIBIT A 6-30-15 Sterling Final v2"	CTRL7424193	2015-06-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 128	Spreadsheet titled "PPVA_6-30-2015 June rollforward and May Position Summary"	CTRL6992975	2015-06-30	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 129	August 2015 SS&C NAV	CTRL7421023	2015-08-01	No Role in Creating NAVs or Setting Valuations	
DX 130	Spreadsheet titled "PPVA-PPLO Investment Breakout Aug 2015 – A&M_v2"	CTRL7311600	2015-08-01	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 131	Spreadsheet titled "PPVA 8-31-2015 Level 2 and 3"	CTRL7311599	2015-08-31	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 132	Platinum Partners Valuation Policy (Update Approved 9/1/2015)	CTRL7381679	2015-09-01	No Role in Creating NAVs or Setting Valuations	
DX 133	Document titled "2015 Q3 Valuation Meeting Agenda"	CTRL7311596	2015-09-22	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 134	September 23, 2015 Email from Eli with subject: "Q3 2015 Valuation Committee Meeting Reminder: Thursday 10:30am EST"	CTRL7325507	2015-09-23	No Role in Creating NAVs or Setting Valuations	
DX 135	Calendar Invite for September 24, 2015, with subject: "Q3 2015 Valuation Committee Meeting"	CTRL7311595	2015-09-24	No Role in Creating NAVs or Setting Valuations	
DX 136	Document titled "Valuation Committee Minutes, September 24, 2015"	CTRL7353766	2015-09-24	No Role in Creating NAVs or Setting Valuations	
DX 137	Platinum Partners Q3 2015 Valuation Committee Minutes, September 24, 2015	CTRL7353738	2015-09-24	No Role in Creating NAVs or Setting Valuations	
DX 138	October 1, 2015 Email from Trey Rogers, with subject: "Re: Valuation Committee Minutes –September 24, 2015"	CTRL7353765	2015-10-01	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 139	Platinum Partners Valuation Policy (Update Approved 10/13/2015)	CTRL7381683	2015-10-13	No Role in Creating NAVs or Setting Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 140	October 20, 2015 Email from Mae Fu with subject: "RE: 6/30 PPVA Drafts" and attaching draft of PPVA's second quarter 2015 Valuation Opinion with a draft of PPVA's second quarter 2015 Valuation Opinion	CTRL7424191	2015-10-20	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 141	October 20, 2015 Email from Marina Fedotova with subject: "PPVA 6/30 Final Opinion"	CTRL7425312	2015-10-20	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 142	Document titled "Compliance Policies and Procedures Manual – November 2015 (11.2.2015 v2)"	CTRL8421814	2015-11-02	No Role in Creating NAVs or Setting Valuations	
DX 143	November 3, 2015 Email from Israel Adler with subject: "Risk committee"	CTRL8421813	2015-11-03	No Role in Creating NAVs or Setting Valuations	
DX 144	January 6, 2016 Email from Mark Nordlicht with subject "RE: RE:" (content is Seth Gerzberg and Kerry)	CTRL7733105	2016-01-06	No Role in Creating NAVs or Setting Valuations	
DX 145	February 22, 2016 Email from Eli Rakower with subject: "FW: Valuation Key Open Items"	CTRL8253173	2016-02-22	No Role in Creating NAVs or Setting Valuations	
DX 146	March 8, 2016 Email from Shankari Mulchadin with subject: "Platinum final valuation reports," attaching A&M's Fourth Quarter 2015 Valuation Report for PPVA	CTRL8309451	2016-03-08	No Role in Creating NAVs or Setting Valuations	Hearsay
DX 147	Platinum Management LLC Risk Committee Meeting Minutes – 4/20/2016	CTRL8022380	2016-04-20	No Role in Creating NAVs or Setting Valuations	
DX 148	Bullen v. Sterling, Memorandum of Law in Support of Defendants' Motion to Dismiss	DEFEXP0000082	2019-11-12	No Role in Creating NAVs or Setting Valuations	Hearsay; relevance
DX 149	Compliance Policies and Procedures Manual – Platinum Management (NY) LLC, Platinum Credit Management LP, Platinum Liquid Opportunity Management (NY) LLC – Nov. 2011	CTRL4615589	2011-11	No Role in Creating NAVs or Setting Valuations	
DX 150	Compliance Policies and Procedures Manual - Platinum Management, Platinum Credit Management, Platinum Liquid Opportunity Management, Bayberry Management, Marbridge Management – June 2015	ALB0001481-1554	2015-06	No Role in Creating NAVs or Setting Valuations	
DX 151	Compliance Policies and Procedures Manual - Platinum Management, Platinum Credit Management, Platinum Liquid Opportunity Management, Bayberry Management, Marbridge Management – June 2015	CTRL7477878	2015-06	No Role in Creating NAVs or Setting Valuations	
DX 152	Valuation Policy	CTRL7477879		No Role in Creating NAVs or Setting Valuations	
DX 153	Valuation Policy	CTRL8419480		No Role in Creating NAVs or Setting Valuations	
DX 154	Fourth Amended and Restated Investment Management Agreement of PPVA, dated March 9, 2007	CTRL2146217	2007-03-09	Not a fiduciary	
DX 155	Third Amended and Restated Limited Partnership Agreement of Platinum Partners Value Arbitrage Fund (USA) L.P., dated March 9, 2007	CTRL0638248	2007-03-09	Not a fiduciary	Relevance
DX 156	Platinum Partners Value Arbitrage Fund (International) Limited, Written Resolutions of the Directors of the Company, dated January 27, 2008	CTRL0644193	2008-01-27	Not a fiduciary	Relevance
DX 157	Second Amended and Restated Limited Partnership Agreement of Platinum Partners Value Arbitrage Fund L.P., dated July 1, 2008	CTRL0594594	2008-07-01	Not a fiduciary	Relevance
DX 158	Second Amended and Restated Limited Partnership Agreement, dated July 1, 2008	CTRL0640739	2008-07-01	Not a fiduciary	Relevance
DX 159	Mark Nordlicht Grantor Trust Agreement	CTRL0726431	2008-11-01	Not a fiduciary	
DX 160	Subscription Agreement for Class K Preferred Shares of Platinum Partners Value Arbitrage Fund (International) Limited	CTRL0582364	2009-01-23	Not a fiduciary	Relevance
DX 161	Subscription Agreement for Preferred Shares of Platinum Partners Value Arbitrage Fund (International) Limited	CTRL0581428	2009-01-23	Not a fiduciary	Relevance
DX 162	Platinum Partners Value Arbitrage Fund (International) Limited, Private Offering of Voting, Participating and Redeemable Class O Shares Confidential Private Offering Memorandum, dated July 2010	CTRL0583949	2010-07-01	Not a fiduciary	Relevance
DX 163	Fourth Amended and Restated Investment Management Agreement, offshore fund	CTRL0587076	2010-12-01	Not a fiduciary	Relevance
DX 164	Second Amended and Restated Operating Agreement of PMNY, effective January 1, 2011	CTRL1968806	2011-01-01	Not a fiduciary	
DX 165	Platinum Management (NY) LLC Form ADV, July 2011	CTRL3261736	2011-07-01	Not a fiduciary	
DX 166	Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries Consolidated Financial Statements – Year Ended December 31, 2011	CTRL3413447	2011-12-01	Not a fiduciary	Hearsay
DX 167	Platinum Management (NY) LLC Form ADV, March 2012	CTRL8942690	2012-03-01	Not a fiduciary	
DX 168	Platinum Partners Value Arbitrage Fund (International) Limited Confidential Private Offering Memorandum, November 2012	CTRL3454802	2012-11-01	Not a fiduciary	Relevance
DX 169	Platinum Partners Value Arbitrage Fund (USA) L.P. Confidential Private Offering Memorandum, November 2012	CTRL4827477	2012-11-01	Not a fiduciary	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 170	Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries Consolidated Financial Statements – Year Ended December 31, 2012	CTRL3654564	2012-12-31	Not a fiduciary	Hearsay
DX 171	Excerpts of PPVA Jan. 2014 Due Diligence Questionnaire (§§ 1.10, 3.4, 6.6, 7.1, 9.1.1)	CTRL6330719	2014-01-01	Not a fiduciary	
DX 172	Email 07.10.2014 Ottensoer to Elovitz et al. re SEC Exam List	CTRL4909227	2014-07-10	Not a fiduciary	
DX 173	Platinum Management (NY) LLC Form ADV, January 2015	CTRL6533730	2015-01-01	Not a fiduciary	
DX 174	Due Diligence Questionnaire, Platinum Management, July 2015	CTRL7527212	2015-07-01	Not a fiduciary	
DX 175	SEC Deficiency Letter	CTRL7360002	2015-09-22	Not a fiduciary	
DX 176	Subscription Agreement for Common Shares of Platinum Partners Value Arbitrage Fund (International) Limited	CTRL7736835	2016-01-08	Not a fiduciary	
DX 177	Subscription Agreement for Limited Partnership Interests in Platinum Partners Value Arbitrage Fund (USA) L.P.	CTRL7736836	2016-01-08	Not a fiduciary	Relevance
DX 178	Platinum Management (NY) LLC Form ADV March 2016 and part 2A	https://reports.adviserinfo.sec.gov/reports/ADV/139405/PDF/139405.pdf ; https://files.adviserinfo.sec.gov/IA/PD/Content/Common/crd_lapd Броchure.aspx?BRCHR_VRSN_ID=377786	2016-03-30	Not a fiduciary	
DX 179	Platinum Partners Value Arbitrage Fund (USA) LP – Private Offering of Class L Limited Partnership Interests – Confidential Private Offering Memorandum Nov 2012	CTRL4596511	2012-11	Not a fiduciary	Relevance; Hearsay
DX 180	Platinum Partners Value Arbitrage Fund LP – Due Diligence Questionnaire Sept. 2013	CTRL_SD_0215269	2013-09	Not a fiduciary	Relevance; Hearsay
DX 181	Platinum Management (NY) LLC – Form ADV – June 2014	CNOCSL_00034062-080	2014-06	Not a fiduciary	
DX 182	Platinum Partners Value Arbitrage Fund (International) Limited - Confidential Private Offering Memorandum – April 2015	CTRL6831302	2015-04	Not a fiduciary	Relevance
DX 183	Code of Ethics – Platinum Management, Platinum Credit Management, Platinum Liquid Opportunity Management, Bayberry Management, Marbridge Management – June 2015	CTRL7477877	2015-06	Not a fiduciary	
DX 184	Due Diligence Questionnaire – Platinum Management (NY) LLC – July 2015	PPVA_RH_0136819	2015-07	Not a fiduciary	
DX 185	Due Diligence Questionnaire – Platinum Management (NY) LLC – Sept. 2015	BW-SHIP-00826755-791	2015-09	Not a fiduciary	
DX 186	Due Diligence Questionnaire – Platinum Management (NY) LLC – Sept. 2015	PPVA_RH_0138337	2015-09	Not a fiduciary	
DX 187	Platinum Management (NY) LLC Investment Adviser Firm Summary	In Nathaniel's zip file		Not a fiduciary	Hearsay
DX 188	Platinum Partners Platinum Credit Management LP – SEC Request Responses	CTRL6645956		Not a fiduciary	Relevance; Hearsay
DX 189	Email from B. Fuchs to M. Nordlicht, A. Kaplan, Fwd: CNN Breaking News, forwarding email from Takalak1@aol.com	CTRL8007776, Fuchs Dep. Ex. 150, Tab 54	2016-01-12	Release	Relevance; Hearsay
DX 190	January 28, 2016, 7:22 PM email from M. Katz to M. Nordlicht, Subject: Re: Marcos Katz PPVA Redemption payment due 1st of February	CTRL8185929	2016-01-28	Release	Hearsay
DX 191	February 2016 email thread between Michael Katz and David Levy and Suzanne Horowitz	CTRL8296755	2016-02-01	Release	Relevance; Hearsay
DX 192	Attachment to CTRL8296755	CTRL8296757	2016-02-18	Release	Relevance; Hearsay
DX 193	Attachment to CTRL8371280	CTRL8371281	2016-03-09	Release	Relevance
DX 194	Attachment to CTRL8371280	CTRL8371282	2016-03-09	Release	Relevance
DX 195	March 9, 2016 5:45 am email from Suzanne Horowitz to Trey Rogers, Subject: Fwd Swap Agreement	CTRL8371280	2016-03-09	Release	Relevance
DX 196	Attachment to CTRL8328966	CTRL8328970	2016-03-13	Release	Relevance
DX 197	March 13, 2016 8:17:16 PM email from Suzanne Horowitz to David Levy forwarding email from Isaac Neuberger, Subject: Fwd: : Marcos Katz Family: Ltr Nordlicht, Bodner, huberfeld, Katz	CTRL8328966	2016-03-13	Release	Relevance
DX 198	March 14, 2016 5:18 pm email from Michael Katz to Suzanne Horowitz, Subject: Fwd: This is the draft of an e-mail that I suggest you send to Suzzane	CTRL8330838	2016-03-14	Release	Relevance
DX 199	Attachment to CTRL8336035	CTRL8336037	2016-03-15	Release	Relevance
DX 200	Attachment to CTRL8336035	CTRL8336038	2016-03-15	Release	Relevance
DX 201	Attachments to CTRL8335278	CTRL8335279	2016-03-15	Release	Relevance
DX 202	Attachments to CTRL8335278	CTRL8335280	2016-03-15	Release	Relevance
DX 203	March 15, 2016 11:19 PM email from D. Ottensoer to H. Werblowsky, D. Levy, and S. Horowitz, Subject: FW: Katz	CTRL8336035	2016-03-15	Release	Relevance
DX 204	March 15, 2016 11:48 pm email from Uri Landesman to Mark Nordlicht, Subject: Re: asking Landesman to discuss release with B. Fuchs	CTRL8336106	2016-03-15	Release	Relevance
DX 205	March 15, 2016 7:32 PM email from Michael Katz to S. Horowitz and D. Levy, Subject: Fwd: Katz	CTRL8335278	2016-03-15	Release	Relevance
DX 206	Attachment to CTRL7751619	CTRL7751620	2016-03-16	Release	Relevance
DX 207	Attachment to CTRL8335927	CTRL8335928	2016-03-16	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 208	Attachment to CTRL8335927	CTRL8335929	2016-03-16	Release	Relevance
DX 209	Attachment to CTRL8335967	CTRL8335968	2016-03-16	Release	Relevance
DX 210	Attachment to CTRL8335973	CTRL8335974	2016-03-16	Release	Relevance
DX 211	Attachment to CTRL8335973	CTRL8335975	2016-03-16	Release	Relevance
DX 212	Attachment to CTRL8336063	CTRL8336064	2016-03-16	Release	Relevance
DX 213	Attachment to CTRL8336097	CTRL8336098	2016-03-16	Release	Relevance
DX 214	Attachment to CTRL8336097	CTRL8336099	2016-03-16	Release	Relevance
DX 215	Attachment to CTRL8336119	CTRL8336120	2016-03-16	Release	Relevance
DX 216	Attachment to CTRL8336141	CTRL8336144	2016-03-16	Release	Relevance
DX 217	Attachment to CTRL8336141	CTRL8336145	2016-03-16	Release	Relevance
DX 218	Attachment to CTRL8336159	CTRL8336162	2016-03-16	Release	Relevance
DX 219	Attachment to CTRL8336159	CTRL8336163	2016-03-16	Release	Relevance
DX 220	Attachment to CTRL8337491	CTRL8337492	2016-03-16	Release	Relevance
DX 221	March 16, 2016 1:04 AM email from S. Horowitz to D. Ottensoser, D. Levy, and H. Werblowsky, Subject: RE: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8335984	2016-03-16	Release	Relevance
DX 222	March 16, 2016 1:06 AM email from D. Ottensoser to D. Levy, S. Horowitz, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336063	2016-03-16	Release	Relevance
DX 223	March 16, 2016 1:26 AM email from D. Levy to D. Ottensoser, S. Horowitz, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8335965	2016-03-16	Release	Relevance
DX 224	March 16, 2016 1:28 AM email from D. Ottensoser to D. Levy, S. Horowitz, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8335967	2016-03-16	Release	Relevance
DX 225	March 16, 2016 1:28 AM email from D. Ottensoser to D. Levy, S. Horowitz, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8335971	2016-03-16	Release	Relevance
DX 226	March 16, 2016 1:29 AM email from D. Levy to D. Ottensoser, S. Horowitz, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336022	2016-03-16	Release	Relevance
DX 227	March 16, 2016 1:42 AM email from D. Levy to S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336000	2016-03-16	Release	Relevance
DX 228	March 16, 2016 11:37 PM email from D. Levy to M. Nordlicht, no subject, on release negotiations	CTRL8338166	2016-03-16	Release	Relevance
DX 229	March 16, 2016 12:30 AM email from D. Ottensoser to D. Levy, S. Horowitz, and H. Werblowsky, Subject: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8335973	2016-03-16	Release	Relevance
DX 230	March 16, 2016 12:30 AM email from D. Ottensoser to S. Horowitz, D. Levy, and H. Werblowsky, Subject: RE: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8335973	2016-03-16	Release	Relevance
DX 231	March 16, 2016 12:32 AM email from S. Horowitz to D. Ottensoser, D. Levy, and H. Werblowsky, Subject: RE: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8335976	2016-03-16	Release	Relevance
DX 232	March 16, 2016 12:39 AM from D. Ottensoser to M. Nordlicht, Subject: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8335927	2016-03-16	Release	Relevance
DX 233	March 16, 2016 2:25 AM email from D. Ottensoser to D. Levy, S. Horowitz, and H. Werblowsky, Subject: RE: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336119	2016-03-16	Release	Relevance
DX 234	March 16, 2016 2:28 AM email from D. Levy to S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: Re: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336092	2016-03-16	Release	Relevance
DX 235	March 16, 2016 2:32 AM email from D. Ottensoser to M. Nordlicht, Subject: Fwd: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8336097	2016-03-16	Release	Relevance
DX 236	March 16, 2016 2:32 AM email from H. Werblowsky to M. Nordlicht, Subject: Re, discussing release	CTRL8336808	2016-03-16	Release	Relevance
DX 237	March 16, 2016 2:38 AM email from H. Werblowsky to M. Nordlicht, Subject: Re, discussing release	CTRL8336873	2016-03-16	Release	Relevance
DX 238	March 16, 2016 2:52 AM email from D. Levy to H. Werblowsky, D. Ottensoser, and M. Nordlicht, Subject: Fwd: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8336141	2016-03-16	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 239	March 16, 2016 3:03 AM email from D. Levy to S. Horowitz and Michael Katz, Subject: Fwd: Release Docs.: 1) Katz/Bodner/Huberfeld; 2) Katz/Nordlicht/Platinum	CTRL8336159	2016-03-16	Release	Relevance
DX 240	March 16, 2016 4:58 PM email from S. Horowitz to D. Levy, D. Ottensoser, and H. Werblowsky, Subject: PLEASE DO NOT FORWARD!	CTRL8337280	2016-03-16	Release	Relevance
DX 241	March 16, 2016 8:16 PM email from B. Fuchs to M. Nordlicht, Subject: Re, on meeting U. Landesman	CTRL8337690	2016-03-16	Release	Relevance
DX 242	March 16, 2016 8:24 PM email from M. Nordlicht to B. Fuchs, Subject: Re, on meeting U. Landesman	CTRL8337720	2016-03-16	Release	Relevance
DX 243	March 16, 2016 Email from Suzanne Horowitz with subject: "MK just told me that Isaac Neuberger is coming in 4:15 pm to discuss the Releases, etc. I am creating a blackline now of the Agreement just sent by the lawyer and will circulate shortly."	CTRL8337163	2016-03-16	Release	Relevance
DX 244	March 16, 2016, 1:29 AM email from S. Horowitz to D. Ottensoser, D. Levy, and H. Werblowsky, Subject: RE: Release Docs.: Platinum/Bodner/Huberfeld/Nordlicht Parties/Others	CTRL8335978	2016-03-16	Release	Relevance
DX 245	March 16, 2016, 4:11 PM email from S. Horowitz to D. Ottensoser, D. Levy, and H. Werblowsky, Subject: RE: MK just told me that Isaac Neuberger is coming in 4:15 pm to discuss the Releases, etc. I am creating a blackline now of the Agreement just sent by the lawyer and will circulate shortly	CTRL8337491	2016-03-16	Release	Relevance
DX 246	March 16, 2018 9:31 PM email from S. Horowitz to G. Hertzberg, D. Levy, D. Ottensoser, H. Werblowsky, and I. Neuberger, Subject: RE: Partners Release	CTRL7751619	2016-03-16	Release	Relevance
DX 247	March 16, 2016 8:24 PM email from B. Fuchs to M. Nordlicht, Subject: Re, on meeting U. Landesman	CTRL8337844	2016-03-16	Release	Relevance
DX 248	Attachment to CTRL7749167	CTRL7749168	2016-03-17	Release	Relevance
DX 249	Attachment to CTRL7749183	CTRL7749184	2016-03-17	Release	Relevance
DX 250	Attachment to CTRL8339831	CTRL8339832	2016-03-17	Release	Relevance
DX 251	Attachment to CTRL8340073	CTRL8340074	2016-03-17	Release	Relevance
DX 252	Attachment to CTRL8340127	CTRL8340128	2016-03-17	Release	Relevance
DX 253	Attachment to CTRL8340127	CTRL8340129	2016-03-17	Release	Relevance
DX 254	Attachment to CTRL8340169	CTRL8340170	2016-03-17	Release	Relevance
DX 255	Attachments to CTRL7749167	CTRL7749169	2016-03-17	Release	Relevance
DX 256	Conflict waiver attachment to CTRL8340153	CTRL8340154	2016-03-17	Release	Relevance
DX 257	Email from M. Nordlicht to D. Levy, Mar. 17, 2016, Re:	CTRL8339736	2016-03-17	Release	Relevance; Hearsay
DX 258	March 17, 2016 1:40 AM email from G. Hertzberg to M. Nordlicht, Subject: Katz/Conflict Waiver & attachment	CTRL8338366	2016-03-17	Release	Relevance
DX 259	March 17, 2016 1:44 PM email from H. Werblowsky to D. Levy, Subject: Fwd: Katz/Conflict Waiver	CTRL8339079	2016-03-17	Release	Relevance
DX 260	March 17, 2016 1:49 PM email from D. Levy to M. Nordlicht, Subject: Fwd: Katz/Conflict Waiver	CTRL8339051	2016-03-17	Release	Appears to be incorrect bates number; Relevance
DX 261	March 17, 2016 1:51 PM email from H. Werblowsky to D. Levy, Subject: Re: Katz/Conflict Waiver	CTRL8339059	2016-03-17	Release	Relevance
DX 262	March 17, 2016 11:36 PM email from S. Horowitz to D. Levy, D. Ottensoser, and H. Werblowsky, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7749167	2016-03-17	Release	Relevance
DX 263	March 17, 2016 11:45 PM email from D. Ottensoser to D. Levy, S. Horowitz, and I. Adler, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7749183	2016-03-17	Release	Relevance
DX 264	March 17, 2016 11:58 PM email from S. Horowitz to I. Adler, D. Levy, and D. Ottensoser, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7749202	2016-03-17	Release	Relevance
DX 265	March 17, 2016 2:01 PM email from M. Nordlicht to D. Levy, Subject: Re: Katz/Conflict Waiver	CTRL8339075	2016-03-17	Release	Relevance
DX 266	March 17, 2016 3:39 PM email from G. Hertzberg to H. Werblowsky and D. Levy, Subject: Re: Katz/Conflict Waiver	CTRL8339478	2016-03-17	Release	Relevance
DX 267	March 17, 2016 4:50 PM email from S. Horowitz to D. Ottensoser and D. Levy, Subject: Revised Release re: Section 3©	CTRL8339831	2016-03-17	Release	Relevance
DX 268	March 17, 2016 4:58 PM email from S. Horowitz to B. Fuchs, D. Levy, D. Ottensoser, and H. Werblowsky, Subject: RE: Revised Release re: Section 3(c)	CTRL8340169	2016-03-17	Release	Relevance
DX 269	March 17, 2016 5:21 PM email from S. Horowitz to G. Hertzberg, J. Geller, D. Levy, D. Ottensoser, and H. Werblowsky, Subject: RE: release	CTRL8340127	2016-03-17	Release	Relevance
DX 270	March 17, 2016 5:23 PM email from G. Hertzberg to H. Werblowsky and D. Levy, Subject: Re: Katz/Conflict Waiver	CTRL8340153	2016-03-17	Release	Relevance
DX 271	March 17, 2016 5:32 PM email from G. Hertzberg to J. Geller, S. Horowitz, D. Levy, D. Ottensoser, and H. Werblowsky, Subject: RE: release	CTRL8339997	2016-03-17	Release	Relevance
DX 272	March 17, 2016 5:35 PM email from S. Horowitz to G. Hertzberg, J. Geller, D. Levy, D. Ottensoser, and H. Werblowsky, Subject: RE: release	CTRL8340073	2016-03-17	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 273	March 17, 2016, 10:12 PM email from S. Horowitz to J. Geller, forwarding two emails	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 274	March 17, 2016, 10:27 PM email from J. Geller to S. Horowitz, forwarding Platinum Management Partners Release	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 275	March 17, 2016, 11:58 PM email from D. Ottensoser to J. Geller and G. Hertzberg, with subject: FW: Release Agreement	CTRL7749503	2016-03-17	Release	Relevance
DX 276	March 17, 2016, 7:35 PM email from J. Geller to I. Neuberger, with subject: Katz, Bodner and Huberfeld release, attaching redline of draft agreement	MKATZ0000550	2016-03-17	Release	Relevance
DX 277	March 17, 2016, 7:35 PM email from J. Geller, Subject: Katz, Bodner and Huberfeld Release, with Clean/Redlined releases attached	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 278	March 17, 2016, 8:42 PM email from D. Ottensoser to J. Geller, S. Horowitz, and G. Hertzberg, attaching draft of release agreement	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 279	March 17, 2016, 9:33 PM email from J. Geller to I. Neuberger, Subject: RE: Katz, Bodner and Huberfeld release, with clean/redlined releases attached, attaching redline of draft agreements	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 280	March 17, 2016, 9:56 email from I. Neuberger to M. Katz, Subject: Release – Katz Platinum Nordlicht, attaching release	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 281	March 17, 2016, 9:59 PM email from I. Neuberger to M. Katz, subject: Release – Katz, with redlined release attached	N/A [provided to JOLs]	2016-03-17	Release	Objection (failure to disclose); Relevance
DX 282	March 18, 2016 4:18 PM email from D. Levy to S. Horowitz, Subject: Re: Katz, Bodner and Huberfeld release	CTRL7750732	2016-03-17	Release	Relevance
DX 283	March 17, 2016 3:46 AM email from D. Levy to M. Nordlicht and S. Horowitz, Subject: Attorney client	CTRL8338511	2016-03-17	Release	Relevance
DX 284	Attachment to CTRL7749414	CTRL7749415	2016-03-18	Release	Relevance
DX 285	Attachment to CTRL7749414	CTRL7749416	2016-03-18	Release	Relevance
DX 286	Attachment to CTRL7749504	CTRL7749505	2016-03-18	Release	Relevance
DX 287	Attachment to CTRL7749504	CTRL7749506	2016-03-18	Release	Relevance
DX 288	Attachment to CTRL7749504	CTRL7749507	2016-03-18	Release	Relevance
DX 289	Attachment to CTRL7749504	CTRL7749508	2016-03-18	Release	Relevance
DX 290	Attachment to CTRL7749504	CTRL7749509	2016-03-18	Release	Relevance
DX 291	Attachment to CTRL7749504	CTRL7749510	2016-03-18	Release	Relevance
DX 292	Attachment to CTRL7751204	CTRL7751205	2016-03-18	Release	Relevance
DX 293	Attachment to CTRL7751204	CTRL7751206	2016-03-18	Release	Relevance
DX 294	Attachment to CTRL7751204	CTRL7751207	2016-03-18	Release	Relevance
DX 295	Attachment to CTRL7751265	CTRL7751266	2016-03-18	Release	Relevance
DX 296	Attachment to CTRL7751265	CTRL7751267	2016-03-18	Release	Relevance
DX 297	Attachment to CTRL7751285	CTRL7751286	2016-03-18	Release	Relevance
DX 298	Attachment to CTRL7751298	CTRL7751299	2016-03-18	Release	Relevance
DX 299	Attachment to CTRL7751298	CTRL7751300	2016-03-18	Release	Relevance
DX 300	Attachment to CTRL7751315	CTRL7751316	2016-03-18	Release	Relevance
DX 301	Attachment to CTRL7751315	CTRL7751317	2016-03-18	Release	Relevance
DX 302	Attachment to CTRL7751315	CTRL7751318	2016-03-18	Release	Relevance
DX 303	Attachment to CTRL7751386	CTRL7751387	2016-03-18	Release	Relevance
DX 304	Attachment to CTRL7751386	CTRL7751388	2016-03-18	Release	Relevance
DX 305	Attachment to CTRL7751611	CTRL7751612	2016-03-18	Release	Relevance
DX 306	Attachment to CTRL7751611	CTRL7751613	2016-03-18	Release	Relevance
DX 307	Attachment to CTRL7751611	CTRL7751614	2016-03-18	Release	Relevance
DX 308	Attachment to CTRL7751611	CTRL7751615	2016-03-18	Release	Relevance
DX 309	Attachment to CTRL7751611	CTRL7751616	2016-03-18	Release	Relevance
DX 310	Attachment to CTRL7751611	CTRL7751617	2016-03-18	Release	Relevance
DX 311	Draft Release Agreement for Platinum, Bodner, Huberfeld, Fuchs, Landesman and the Nordlicht Parties	CTRL7752024	2016-03-18	Release	Relevance
DX 312	Email from David Levy to G. Hertzberg, Mar. 18, 2016, Re: Katz, Bodner and Huberfeld Release	CTRL7750183	2016-03-18	Release	Hearsay, relevance
DX 313	Email from G. Hertzberg to M. Nordlicht and D. Levy forwarding attached revised draft Release Agreements, Mar. 18, 2016	CTRL7749513	2016-03-18	Release	Relevance
DX 314	March 17, 2016 4:17 PM email from S. Horowitz to D. Levy, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7750540	2016-03-18	Release	Relevance
DX 315	March 18, 11:32 AM email from H. Werblowsky to I. Neuberger, S. Horowitz, D. Ottensoser, and D. Levy, Subject: Re: Katz, Bodner and Huberfeld release	CTRL7749715	2016-03-18	Release	Relevance
DX 316	March 18, 2016 1:48 PM email from M. Katz to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, G. Hertzberg, J. Geller, and I. Neuberger, Subject: Re: Katz, Bodner and Huberfeld release	CTRL7749964	2016-03-18	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 317	March 18, 2016 1:51 PM email from D. Levy to Michael Katz, Subject: Re: Katz, Bodner and Huberfeld release	CTRL7750037	2016-03-18	Release	Relevance
DX 318	March 18, 2016 10:50 PM email from D. Levy to S. Horowitz, Subject: Re: Partners Release	CTRL7751715	2016-03-18	Release	Relevance
DX 319	March 18, 2016 2:54 AM email from D. Ottensoser to S. Horowitz and D. Levy, Subject: FW: Release agreement	CTRL7749394	2016-03-18	Release	Relevance
DX 320	March 18, 2016 3:15 PM email from G. Hertzberg to M. Katz, S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, J. Geller, I. Neuberger, and T. Wood, Subject: Re: Katz, Bodner and Huberfeld release	CTRL7750395	2016-03-18	Release	Relevance
DX 321	March 18, 2016 3:26 AM email from D. Ottensoser to S. Horowitz and D. Levy, Subject: FW: Release agreement	CTRL7749417	2016-03-18	Release	Relevance
DX 322	March 18, 2016 3:28 AM email from I. Neuberger to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, and M. Katz, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7749418	2016-03-18	Release	Relevance
DX 323	March 18, 2016 4:03 PM email from I. Neuberger to M. Katz, G. Hertzberg, J. Geller, D. Levy, S. Horowitz, D. Ottensoser, H. Werblowsky, and T. Wood, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7750635	2016-03-18	Release	Relevance
DX 324	March 18, 2016 4:08 AM (12:08 EST) email from J. Geller to G. Hertzberg, I. Neuberger, T. Wood, S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, and M. Katz, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7749504	2016-03-18	Release	Relevance
DX 325	March 18, 2016 4:15 PM email from I. Neuberger to M. Katz, G. Hertzberg, J. Geller, D. Levy, S. Horowitz, D. Ottensoser, H. Werblowsky, and T. Wood, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7750616	2016-03-18	Release	Relevance
DX 326	March 18, 2016 4:16 PM email from I. Neuberger to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, M. Katz, and T. Wood, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7750536	2016-03-18	Release	Relevance
DX 327	March 18, 2016 4:17 PM email from D. Levy to I. Neuberger, S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, M. Katz, and T. Wood, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7750582	2016-03-18	Release	Relevance
DX 328	March 18, 2016 4:20 AM email from S. Horowitz to G. Hertzberg, J. Geller, H. Werblowsky, D. Levy, and D. Ottensoser, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7749523	2016-03-18	Release	Relevance
DX 329	March 18, 2016 4:30 PM email from I. Neuberger to H. Werblowsky, S. Horowitz, D. Levy, D. Ottensoser, M. Katz, and T. Wood	CTRL7750676	2016-03-18	Release	Relevance
DX 330	March 18, 2016 7:08 PM email from G. Hertzberg to J. Geller, D. Levy, I. Neuberger, S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, T. Wood, and M. Katz, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7751204	2016-03-18	Release	Relevance
DX 331	March 18, 2016 7:20 PM email from G. Hertzberg to J. Geller, D. Levy, I. Neuberger, S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, M. Katz, and T. Wood, Subject: Katz, Bodner and Nordlicht	CTRL7751265	2016-03-18	Release	Relevance
DX 332	March 18, 2016 7:25 PM email from D. Levy to G. Hertzberg, J. Geller, I. Neuberger, S. Horowitz, D. Ottensoser, H. Werblowsky, and M. Katz, Subject: RE: Katz, Bodner and Huberfeld	CTRL7751271	2016-03-18	Release	Relevance
DX 333	March 18, 2016 7:25 PM email from G. Hertzberg to J. Geller, I. Neuberger, S. Horowitz, D. Ottensoser, D. Levy, H. Werblowsky, M. Katz, and T. Wood, Subject: Katz, Bodner and Huberfeld	CTRL7751298	2016-03-18	Release	Relevance
DX 334	March 18, 2016 7:32 PM email from I. Neuberger to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, T. Wood, and M. Katz, Subject: #24958278v1_DB1_ - Release - Platinum Management Partners (CMP 3.18	CTRL7751285	2016-03-18	Release	Relevance; Hearsay
DX 335	March 18, 2016 7:38 PM email from D. Ottensoser to S. Horowitz, H. Werblowsky, and D. Steinberg, Subject: FW: Katz, Bodner and Huberfeld release	CTRL7751315	2016-03-18	Release	Relevance
DX 336	March 18, 2016 7:40 PM email from D. Ottensoser to S. Horowitz, H. Werblowsky, and D. Levy, Subject: FW: Katz, Bodner, and Nordlicht	CTRL7751386	2016-03-18	Release	Relevance
DX 337	March 18, 2016 9:40 PM email from S. Horowitz to M. Nordlicht, D. Levy, and D. Ottensoser, Subject: Katz Set of Agreements	CTRL7751611	2016-03-18	Release	Relevance
DX 338	March 18, 2016 at 3:19 AM email from J. Geller to S. Horowitz, et al, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7749414	2016-03-18	Release	Relevance
DX 339	March 18, 2016 at 4:08 AM UTC (12:08 AM EST) email from J. Geller to S. Horowitz, et al, Subject: RE: Katz, Bodner and Huberfeld release	CTRL7749843	2016-03-18	Release	Relevance
DX 340	March 18, 2016, 10:36 PM email from G. Hertzberg to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, and I. Neuberger, Subject: RE: Partners Release	CTRL7751705	2016-03-18	Release	Relevance
DX 341	March 18, 2016, 11:08 PM email from G. Hertzberg to S. Horowitz, D. Levy, D. Ottensoser, H. Werblowsky, and I. Neuberger, Subject: RE: Partners Release	CTRL7751741	2016-03-18	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 342	March 18, 2016, 11:31 PM email from S. Horowitz to G. Hertzberg, D. Levy, D. Ottensoser, H. Werblowsky, and I. Neuberger, Subject: RE: Partners Release	CTRL7751755	2016-03-18	Release	Relevance
DX 343	March 18, 2016, 12:15 PM email from D. Levy to I. Neuberger, G. Hertzberg, M. Katz, and J. Geller	CTRL7750716	2016-03-18	Release	Relevance
DX 344	March 18, 2016, 12:22 AM email from M. Katz to J. Geller, with subject: Re: Katz, Bodner and Huberfeld release	CTRL7749524	2016-03-18	Release	Relevance
DX 345	March 18, 2016, 12:44 AM email from D. Levy to S. Horowitz, G. Hertzberg, J. Geller, and D. Ottensoser, with subject: Re: Katz, Bodner and Huberfeld release	CTRL7749540	2016-03-18	Release	Relevance
DX 346	March 18, 2016, 3:21 PM email from G. Hertzberg to J. Geller, Platinum people attaching draft and redline of release	CTRL7751269	2016-03-18	Release	Relevance
DX 347	March 20, 2016 1:17 AM email from D. Levy to M. Nordlicht, Subject: Re: RE: RE, on release signature progress	CTRL7751988	2016-03-20	Release	Relevance
DX 348	March 20, 2016 1:18 AM email from D. Levy to M. Nordlicht, Subject: Re: RE: RE, on release signature progress	CTRL7751991	2016-03-20	Release	Relevance
DX 349	March 20, 2016 1:18 AM email from D. Levy to M. Nordlicht, Subject: Re: RE: RE, on release signature progress	CTRL7752001	2016-03-20	Release	Relevance
DX 350	March 20, 2016 1:20 AM email from H. Werblowsky to D. Levy, Subject Re: RE: Re:, about removing PPVA from the release	CTRL7751992	2016-03-20	Release	Relevance
DX 351	March 20, 2016 1:21 AM email from D. Levy to H. Werblowsky, Subject Re: RE: Re:, about removing PPVA from the release	CTRL7751998	2016-03-20	Release	Relevance
DX 352	March 20, 2016 12:01 AM email from D. Levy to M. Nordlicht, Subject: Re: RE, on release signature progress	CTRL7751944	2016-03-20	Release	Relevance
DX 353	March 20, 2016 12:02 AM from D. Levy to S. Horowitz, Subject: Re: Partners Release	CTRL7751947	2016-03-20	Release	Relevance
DX 354	March 20, 2016 12:03 AM email from D. Levy to G. Hertzberg, I. Neuberger, S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: Re: Partners Release	CTRL7751949	2016-03-20	Release	Relevance
DX 355	March 20, 2016 12:07 AM email from G. Hertzberg to D. Levy, I. Neuberger, S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: Re: Partners Release	CTRL7751953	2016-03-20	Release	Relevance
DX 356	March 20, 2016 12:09 AM email from D. Levy to G. Hertzberg, I. Neuberger, S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: Re: Partners Release	CTRL7751958	2016-03-20	Release	Relevance
DX 357	March 20, 2016 12:31 AM email from H. Werblowsky to G. Hertzberg, S. Horowitz, and D. Levy, Subject: Re: RE: Re:	CTRL7751957	2016-03-20	Release	Relevance
DX 358	March 20, 2016 12:32 AM email from G. Hertzberg to H. Werblowsky, S. Horowitz, and D. Levy, Subject: Re: RE: Re:	CTRL7751969	2016-03-20	Release	Relevance
DX 359	March 20, 2016 12:32 AM email from H. Werblowsky to G. Hertzberg, S. Horowitz, and D. Levy, Subject: Re: RE: Re:	CTRL7751981	2016-03-20	Release	Relevance
DX 360	March 20, 2016 12:49 AM email from D. Levy to H. Werblowsky, Subject Re: RE: Re:, about removing PPVA from the release	CTRL7751985	2016-03-20	Release	Relevance
DX 361	March 20, 2016 2:16 AM email from D. Levy to G. Hertzberg, S. Horowitz, and H. Werblowsky, Subject: Re: RE: RE: Re:	CTRL7752017	2016-03-20	Release	Relevance
DX 362	March 20, 2016 3:04 am email from Isaac Neuberger to Gabriel Hertzberg, J. Geller, Subject: FW: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752023	2016-03-20	Release	Relevance
DX 363	March 20, 2016 3:12 PM email from D. Levy to Michael Katz, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752288	2016-03-20	Release	Relevance
DX 364	March 20, 2016 3:25 PM email from Michael Katz to D. Levy, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752296	2016-03-20	Release	Relevance
DX 365	March 20, 2016 3:35 PM email from D. Levy to Michael Katz, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752308	2016-03-20	Release	Relevance
DX 366	March 20, 2016 4:36 PM email from D. Levy to M. Nordlicht, Subject: Re:, on G. Hertzberg changing mind about removing PPVA from the release	CTRL7752383	2016-03-20	Release	Relevance
DX 367	March 20, 2016 5:01 PM email from Michael Katz to D. Levy, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752408	2016-03-20	Release	Relevance
DX 368	March 20, 2016 5:09 PM email from D. Levy to Michael Katz, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752414	2016-03-20	Release	Relevance
DX 369	March 20, 2016 5:16 PM email from Michael Katz to D. Levy, Subject: Re: #24958278v3_DB1 - Release - Platinum Management Partners (CMP 3.18)	CTRL7752420	2016-03-20	Release	Relevance
DX 370	March 20, 2016 5:30 PM calendar invite from G. Hertzberg to S. Horowitz, D. Levy, D. Ottensoser, and H. Werblowsky, Call re release	CTRL7752419	2016-03-20	Release	Relevance
DX 371	March 20, 2016, 10:23 PM email from G. Hertzberg, attaching redline of releases	CTRL7752849	2016-03-20	Release	Relevance
DX 372	March 20, 2016, 10:37 AM email from G. Hertzberg to I. Neuberger	CTRL7752247	2016-03-20	Release	Relevance
DX 373	March 20, 2016, 2:00 AM email from G. Hertzberg to D. Levy, H. Werblowsky	CTRL7752114	2016-03-20	Release	Relevance
DX 374	March 20, 2016, 4:53 PM email from G. Hertzberg to I. Neuberger, M. Katz, attaching clean and redline versions of draft that Platinum views as final	CTRL7752574	2016-03-20	Release	Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 375	March 20, 2016, 5:09 PM email from I. Neuberger to G. Hertzberg saying he will need time to review the final releases	CTRL7752585	2016-03-20	Release	Relevance
DX 376	March 20, 2016, 7:06 AM email from G. Hertzberg to D. Levy	CTRL7752145	2016-03-20	Release	Relevance
DX 377	March 20, 2016, 7:06 PM email from I. Neuberger to J. Geller, G. Hertzberg requesting change in Paragraph 1(b), attaching redline of draft	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 378	March 20, 2016, 7:09 PM email from I. Neuberger to G. Hertzberg and J. Geller requesting change to Paragraph 2(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 379	March 20, 2016, 7:16 PM email from G. Hertzberg to I. Neuberger, asking I. Neuberger to address Harvey and David regarding change to Paragraph 1(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 380	March 20, 2016, 7:19 email from I. Neuberger to G. Hertzberg saying he is addressing G. Hertzberg for changes to Paragraph 1(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 381	March 20, 2016, 7:47 PM email from G. Hertzberg to I. Neuberger and J. Geller addressing paragraph 3(c)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 382	March 20, 2016, 7:48 PM email from I. Neuberger to G. Hertzberg, regarding Hertzberg's changes to paragraph 3(c)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 383	March 20, 2016, 7:52 PM email from G. Hertzberg to I. Neuberger and J. Geller, stating he will make the change to paragraph 2(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 384	March 20, 2016, 7:52 PM email from G. Hertzberg to I. Neuberger and J. Geller, stating he will not make the change to paragraph 1(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 385	March 20, 2016, 7:53 email from I. Neuberger to G. Hertzberg, J. Geller asking why he will not make changes to paragraph 1(b)	N/A [provided to JOLs]	2016-03-20	Release	Objection (failure to disclose); Relevance
DX 386	March 20, 2016, 8:07 PM email from G. Hertzberg attaching execution drafts of release	CTRL7752714	2016-03-20	Release	Relevance
DX 387	March 20, 2016, 9:04 PM email from I. Neuberger regarding change requested to 1(b)	CTRL7752784	2016-03-20	Release	Relevance
DX 388	Memo from E. Lauer and G. Hertzberg to S. Horowitz and H. Werblowsky, Re: Platinum Releases	CTRL7752750	2016-03-20	Release	Hearsay; Relevance
DX 389	Release Agreement (Platinum, Bodner, Huberfeld, Fuchs, Landesman and the Nordlicht Parties) – March 20, 2016	BODNER0000001-10	2016-03-20	Release	Hearsay
DX 390	Release Agreement [Partners only]	CTRL7991698	2016-03-20	Release	Relevance
DX 391	Unsigned Release Agreement for Bodner, Huberfeld, and Katz	CTRL7752836	2016-03-20	Release	Relevance
DX 392	Unsigned Release Agreement for Katz, Platinum, and the Nordlicht Parties	CTRL7752837	2016-03-20	Release	Relevance
DX 393	Unsigned Release Agreement for Platinum, Bodner, Huberfeld, Fuchs, Landesman and the Nordlicht Parties	CTRL7752838	2016-03-20	Release	Relevance
DX 394	Attachment to CTRL7752726	CTRL7752727	2016-03-21	Release	Relevance
DX 395	Attachment to CTRL7752726	CTRL7752728	2016-03-21	Release	Relevance
DX 396	Certified translation of Michael Katz's Spanish letter to Marcos and Adela Katz		2016-03-21	Release	Hearsay; Relevance
DX 397	March 21, 2016 1:16 AM email from S. Horowitz to D. Levy, Subject: RE: Katz Set of Agreements	CTRL7752801	2016-03-21	Release	Relevance
DX 398	March 21, 2016 1:23 AM email from D. Levy to S. Horowitz, Subject: FW: Katz Set of Agreements	CTRL7752809	2016-03-21	Release	Relevance
DX 399	March 21, 2016 1:45 AM email from M. Katz to S. Horowitz, D. Levy, D. Ottensoser, and H. Werblowsky, Subject: Re: #24962201v3_DB1_ - Release - Katz Platinum Nordlicht (CMP 3	CTRL7752824	2016-03-21	Release	Relevance
DX 400	March 21, 2016 12:24 AM email from S. Horowitz to D. Levy, D. Ottensoser, and H. Werblowsky, Subject: FW: Katz Set of Agreements	CTRL7752726	2016-03-21	Release	Relevance
DX 401	March 21, 2016 12:33 AM email from D. Levy to S. Horowitz, D. Ottensoser, and H. Werblowsky, Subject: FW: Katz Set of Agreements	CTRL7752738	2016-03-21	Release	Relevance
DX 402	March 21, 2016 12:34 AM email from D. Levy to S. Horowitz, Subject: FW: Katz Set of Agreements	CTRL7752742	2016-03-21	Release	Relevance
DX 403	March 21, 2016 12:36 AM email from S. Horowitz to D. Levy, D. Ottensoser, and H. Werblowsky, Subject: RE: Katz Set of Agreements	CTRL7752752	2016-03-21	Release	Relevance
DX 404	March 21, 2016 12:37 AM email from D. Levy to S. Horowitz, Subject: FW: Katz Set of Agreements	CTRL7752746	2016-03-21	Release	Relevance
DX 405	March 21, 2016 2:14 am email from Gabriel Hertzberg to David Levy, Harvey Werblowsky, Michael Katz, and Suzanne Horowitz, Subject: RE: Releases – Execution Versions	CTRL7752834	2016-03-21	Release	Relevance
DX 406	March 21, 2016 3:12 AM email from D. Levy to S. Horowitz, D. Ottensoser, and H. Werblowsky	CTRL7752861	2016-03-21	Release	Relevance
DX 407	March 21, 2016 letter from Michael Katz to Marcos and Adina Katz, Subject: Platinum & attachments	CTRL7752910	2016-03-21	Release	Relevance
DX 408	March 27, 2016 11:03am email from Mark Nordlicht to Michael Katz, Subject: RE: Trip	CTRL7772355	2016-03-27	Release	Hearsay; Relevance

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 409	3/30/16 email from Michael Katz to M. Nordlicht on draft email to Marcos Katz on value of his investment and value of Bodner and Huberfeld's release	CTRL7777956	2016-03-30	Release	Hearsay; Relevance
DX 410	4/12/16 email draft from M. Nordlicht to Marcos Katz on steps taken to address liquidity issues	CTRL7823633	2016-04-12	Release	Hearsay; Relevance
DX 411	faxes to Marcos Katz discussing liquidity	CTRL7828371, CTRL7828372	2016-04-13	Release	Hearsay; Relevance
DX 412	April 14, 2016 7:01 pm email from Joe Mann to David Levy, Subject: Term Sheet attaching term sheet	CTRL7828192	2016-04-14	Release	Hearsay; Relevance
DX 413	Attachment to CTRL7828192	CTRL7828193	2016-04-14	Release	Hearsay; Relevance
DX 414	Email from M. Nordlicht to H. Werblowsky, April 19, 2016, Re: initial comment	CTRL7851796	2016-04-19	Release	Hearsay; Relevance
DX 415	Emails re liquidity	CTRL8551457	2016-04-19	Release	Hearsay; Relevance
DX 416	May 8, 2016 A&M Report on PPVA valuations as of December 31, 2015 (Q4 2015)	CTRL7754971	2016-05-08	Release	Hearsay
DX 417	May 12, 2016 10:18 pm email from Michael Katz to David Levy, Subject: Re: Releases – Execution Versions	CTRL7918805	2016-05-12	Release	Relevance
DX 418	May 16, 2016 message from M. Marcos Katz to M. Nordlicht regarding meeting in Acapulco	CTRL7934435	2016-05-16	Release	Relevance
DX 419	May 16, 2016 message from M. Nordlicht to M. Katz regarding withdrawing \$10 million	CTRL7934831	2016-05-16	Release	Relevance
DX 420	May 18, 2016 8:42 pm email from Michael Katz to Mark Nordlicht, Subject: Response draft. Part of what was prepared for Bernie	CTRL7938628	2016-05-18	Release	Hearsay; Relevance
DX 421	Email from M. Nordlicht to Michael Katz, June 6, 2016, Fwd: Bullets	CTRL7990433	2016-06-06	Release	Relevance; Hearsay
DX 422	June 7, 2016 8:50 pm email from Michael Katz to Suzanne Horowitz, Subject: Marcos Katz executed documents with attached agreements	CTRL8022084; CTRL8022085; CTRL8022086; CTRL8022087; CTRL8022088; CTRL8022089; CTRL8022090	2016-06-07	Release	Relevance
DX 423	June 7, 2016 email from Suzanne Horowitz to M. Katz, D. Ottensofer, D. Levy, RE: Swap Agreement and Word version of the "Katz Agreement"	CTRL7991697	2016-06-07	Release	Relevance; Hearsay
DX 424	Related Agreements with Katz	CTRL7991698; CTRL7991699; CTRL7991700; CTRL7991701; CTRL7991702	2016-06-07	Release	Relevance
DX 425	Related Agreements with Katz	Katz dep. Ex. 23	2016-06-07	Release	Relevance
DX 426	Forbes Article re Huberfeld arrest		2016-06-08	Release	Failure to specifically identify exhibits
DX 427	July 27, 2016 letter from Platinum to Michael Katz and family	CTRL8135590	2016-07-27	Release	Hearsay; Relevance
DX 428	Emails - A. Novak to G. Hertzberg, May 1, 2019, RE: Bodner/ Fuchs	In Nathaniel's zip file	2019-05-01	Release	Failure to disclose; hearsay; relevance
DX 429	Grosser Lane Management LLC Operating Agreement	CTRL4938126	2008-11-01	Significant Investor	
DX 430	SS&C Investor Capital Detail for Partnership – January 2012	CTRL3298673	2012-01-01	Significant Investor	
DX 431	SS&C Investor Capital Detail for Partnership – February 2012	CTRL3191547	2012-02-01	Significant Investor	
DX 432	SS&C Investor Capital Detail for Partnership – May 2012	CTRL3272986	2012-05-01	Significant Investor	
DX 433	SS&C Investor Capital Detail for Partnership – June 2012	CTRL3364224	2012-06-01	Significant Investor	
DX 434	SS&C Investor Capital Detail for Partnership – July 2012	CTRL3525523	2012-07-01	Significant Investor	
DX 435	SS&C Investor Capital Detail for Partnership – August 2012	CTRL3415643	2012-08-01	Significant Investor	
DX 436	SS&C Investor Capital Detail for Partnership – October 2012	CTRL3492277	2012-10-01	Significant Investor	
DX 437	SS&C Investor Capital Detail for Partnership – November 2012	CTRL3357806	2012-11-01	Significant Investor	
DX 438	SS&C Investor Capital Detail for Partnership – February 2013	CTRL4345664	2013-02-01	Significant Investor	
DX 439	SS&C Investor Capital Detail for Partnership – March 2013	CTRL4489275	2013-03-01	Significant Investor	
DX 440	SS&C Investor Capital Detail for Partnership – May 2013	CTRL4812127	2013-05-01	Significant Investor	
DX 441	SS&C Investor Capital Detail for Partnership – June 2013	CTRL4622142	2013-06-01	Significant Investor	
DX 442	SS&C Investor Capital Detail for Partnership – July 2013	CTRL4723432	2013-07-01	Significant Investor	
DX 443	SS&C Investor Capital Detail for Partnership – August 2013	CTRL4785969	2013-08-01	Significant Investor	
DX 444	SS&C Investor Capital Detail for Partnership – September 2013	CTRL4617142	2013-09-01	Significant Investor	
DX 445	SS&C Investor Capital Detail for Partnership – October 2013	CTRL4825023	2013-10-01	Significant Investor	
DX 446	October 31, 2013 Email from Zach Weiner to Marina Fedotova with subject: "Fwd: sep 30 marks presentation ppva (3).xlsx" and attachments	CTRL4723989	2013-10-31	Significant Investor	Hearsay
DX 447	SS&C Investor Capital Detail for Partnership – November 2013	CTRL4814546	2013-11-01	Significant Investor	
DX 448	SS&C Investor Capital Detail for Partnership – December 2013	CTRL6323770	2013-12-01	Significant Investor	
DX 449	SS&C Investor Capital Detail for Partnership – January 2014	CTRL6258192	2014-01-01	Significant Investor	
DX 450	SS&C Investor Capital Detail for Partnership – February 2014	CTRL6051264	2014-02-01	Significant Investor	
DX 451	SS&C Investor Capital Detail for Partnership – March 2014	CTRL6156908	2014-03-01	Significant Investor	
DX 452	SS&C Investor Capital Detail for Partnership – May 2014	CTRL6026295	2014-05-01	Significant Investor	
DX 453	SS&C Investor Capital Detail for Partnership – June 2014	CTRL6208302	2014-06-01	Significant Investor	
DX 454	SS&C Investor Capital Detail for Partnership – August 2014	CTRL5673884	2014-08-01	Significant Investor	
DX 455	SS&C Investor Capital Detail for Partnership – September 2014	CTRL5798445	2014-09-01	Significant Investor	
DX 456	SS&C Investor Capital Detail for Partnership – October 2014	CTRL5911196	2014-10-01	Significant Investor	
DX 457	SS&C Investor Capital Detail for Partnership – November 2014	CTRL6448235	2014-11-01	Significant Investor	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 458	SS&C Investor Capital Detail for Partnership – December 2014	CTRL6590434	2014-12-01	Significant Investor	
DX 459	SS&C Investor Capital Detail for Partnership – January 2015	CTRL6697309	2015-01-01	Significant Investor	
DX 460	SS&C Investor Capital Detail for Partnership – February 2015	CTRL6697131	2015-02-01	Significant Investor	
DX 461	SS&C Investor Capital Detail for Partnership – March 2015	CTRL6787881	2015-03-01	Significant Investor	
DX 462	SS&C Investor Capital Detail for Partnership – April 2015	CTRL6883418	2015-04-01	Significant Investor	
DX 463	SS&C Investor Capital Detail for Partnership – May 2015	CTRL7035640	2015-05-01	Significant Investor	
DX 464	SS&C Investor Capital Detail for Partnership – June 2015	CTRL7129098	2015-06-01	Significant Investor	
DX 465	SS&C Investor Capital Detail for Partnership – July 2015	CTRL7261363	2015-07-01	Significant Investor	
DX 466	SS&C Investor Capital Detail for Partnership – August 2015	CTRL7327225	2015-08-01	Significant Investor	
DX 467	SS&C Investor Capital Detail for Partnership – September 2015	CTRL7451918	2015-09-01	Significant Investor	
DX 468	SS&C Investor Capital Detail for Partnership – October 2015	CTRL7544233	2015-10-01	Significant Investor	
DX 469	SS&C Investor Capital Detail for Partnership – November 2015	CTRL8013582	2015-11-01	Significant Investor	
DX 470	SS&C Investor Capital Detail for Partnership – December 2015	CTRL8282693	2015-12-01	Significant Investor	
DX 471	SS&C Investor Capital Detail for Partnership – January 2016	CTRL7803821	2016-01-01	Significant Investor	
DX 472	SS&C Investor Capital Detail for Partnership – February 2016	CTRL7810156	2016-02-01	Significant Investor	
DX 473	SS&C Investor Capital Detail for Partnership S – March 2016	CTRL7880814	2016-03-01	Significant Investor	
DX 474	Operating Agreement of Manor Lane Management LLC	CTRL0730025		Significant Investor	
DX 475	David Steinberg	ECF No. 274, 277	3/14/2019, 3/19/2019	Stipulations of Dismissal	Relevance
DX 476	Adela Katz	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 477	Estate of Marcos Katz	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 478	Golda Wilk	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 479	Mind Body & Soul Co., Ltd.	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 480	MN Consulting NY LLC	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 481	Olive Tree Holdings, LLC	ECF No. 402, 406	6/13/2019, 6/18/2019	Stipulations of Dismissal	Relevance
DX 482	Twosons Corporation	ECF No. 429	7/12/2019 (both)	Stipulations of Dismissal	Relevance
DX 483	Kevin Cassidy	ECF No. 504, 506	1/28/2020, 1/31/2020	Stipulations of Dismissal	Relevance
DX 484	Michael Nordlicht	ECF No. 504, 506	1/28/2020, 1/31/2020	Stipulations of Dismissal	Relevance
DX 485	Estate of Uri Landesman	ECF No. 508, 509	2/12/2020, 2/13/2020	Stipulations of Dismissal	Relevance
DX 486	Platinum F.I. Group LLC	ECF No. 539, 541	2/24/2020, 2/26/2020	Stipulations of Dismissal	Relevance
DX 487	Daniel Saks	ECF No. 542, 544	3/3/2020, 3/5/2020	Stipulations of Dismissal	Relevance
DX 488	Huang Lai Tsu Hsia	ECF No. 605, 606	3/25/2020 (both)	Stipulations of Dismissal	Relevance
DX 489	Ezra Beren	ECF No. 625, 626	4/29/2020 (both)	Stipulations of Dismissal	Relevance
DX 490	B Asset Manager II LP	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 491	B Asset Manager LP	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 492	BAM Administrative Services, LLC	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 493	BBLN-PEDCO Corp.	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 494	Beechwood Bermuda International Ltd.	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 495	Beechwood Capital Group LLC	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 496	Beechwood Re	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 497	Beechwood Re Holdings, Inc.	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 498	Beechwood Re Investments LLC	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 499	Beechwood Re LTD.	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 500	BHLN-PEDCO Corp.	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 501	Dhruv Narain	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 502	Illumin Capital Management LP	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 503	Moshe Feuer	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 504	Scott Taylor	ECF No. 637, 638	5/25/2020, 5/26/2020	Stipulations of Dismissal	Relevance
DX 505	Joseph SanFilippo	ECF No. 649, 650	8/12/2020, 8/17/2020	Stipulations of Dismissal	Relevance
DX 506	Seth Gerszberg	ECF No. 663, 665	9/18/2020, 9/22/2020	Stipulations of Dismissal	Relevance
DX 507	Bankers Conesco Life Ins. Co. - LTC 2, as successor in interest to BRE BCLIC Primary and Bre BCLIC Sub	ECF No. 734, 735	04/04/2022, 04/06/2022	Stipulations of Dismissal	Relevance
DX 508	Private Bankers Life Annuity LTC 2, as successor in interest to BBIL ULICO 2014 Trust	ECF No. 734, 735	04/04/2022, 04/06/2022	Stipulations of Dismissal	Relevance
DX 509	Washington National LTC 2, as successor in interest to BRE WNIC 2013 LTC Primary and Bre WNIC 2013 LTC Sub	ECF No. 734, 735	04/04/2022, 04/06/2022	Stipulations of Dismissal	Relevance
DX 510	Murray Huberfeld	ECF No. 736, 737	05/03/2022, 05/05/2022	Stipulations of Dismissal	Relevance
DX 511	[placeholder] graphics			Summary exhibits	Plaintiffs reserve right to object
DX 512	Chart listing people and companies with whom Trott has settled his claims			Summary exhibits	Objection (failure to disclose)
DX 513	Chart: Nordlicht's control/ownership of Platinum Management			Summary exhibits	Plaintiffs reserve right to object
DX 514	Chart: PPVA / Platinum Management organization structure			Summary exhibits	Plaintiffs reserve right to object
DX 515	Incentive fee summary tables			Summary exhibits	Failure to specifically identify exhibits
DX 516	Settlement or cooperation agreements between JOLs and testifying persons			Summary exhibits	Objection (failure to disclose)
DX 517	Table of GOL 15-108 parties			Summary exhibits	Objection (failure to disclose)

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 518	Table/chart: Cash withdrawals from incentive fees by Platinum insiders (derived from SS&C data)			Summary exhibits	Plaintiffs reserve right to object
DX 519	Table/chart: PPVA cash inflows/outflows (derived from SS&C data)			Summary exhibits	Plaintiffs reserve right to object
DX 520	Tables/charts comparing PPVA valuations with outside auditor/valuation assessments			Summary exhibits	Plaintiffs reserve right to object
DX 521	Sterling Engagement Letter	PPVA_RH_0698806	2008-12-09	Valuations	Hearsay
DX 522	Platinum Management Valuation Opinion, dated Sept. 8, 2009 from Serling	CTRL4299300	2009-09-08	Valuations	Hearsay; Relevance
DX 523	Platinum Management Valuation Opinion, dated Sept. 8, 2009, from Sterling	CTRL4299296	2009-09-08	Valuations	Hearsay; Relevance
DX 524	Platinum Partners Valuation Policy (Update Approved 8/5/2010)	CTRL0577703	2010-08-05	Valuations	
DX 525	Platinum Management Valuation Opinion, dated Oct. 19, 2010 from Sterling	CTRL4299298	2010-10-19	Valuations	Hearsay; Relevance
DX 526	Platinum Management Valuation Opinion, Dated Oct. 19, 2010, from Sterling	CTRL4299297	2010-10-19	Valuations	Hearsay; Relevance
DX 527	PPVA's Third Quarter 2011 Valuation Opinion from Sterling	CTRL4299294	2011-11-09	Valuations	Hearsay; Relevance
DX 528	Platinum Partners Value Arbitrage Fund (International) Limited and Subsidiary Consolidated Financial Statements Year Ended December 31, 2011	CTRL3300306	2011-12-31	Valuations	Hearsay; Relevance
DX 529	Platinum Partners Value Arbitrage Fund (USA) L.P. Financial Statements Year Ended December 31, 2011	CTRL3439871	2011-12-31	Valuations	Hearsay; Relevance
DX 530	PPVA's Fourth Quarter 2011 Valuation Opinion from Sterling	CTRL4299295	2012-02-09	Valuations	Hearsay; Relevance
DX 531	May 8, 2012 Sterling Report on PPVA valuations as of March 31, 2012 (Q1 2012)	CTRL3330291	2012-05-08	Valuations	Hearsay; Relevance
DX 532	PPVA's First Quarter 2012 Valuation Opinion from Sterling	CTRL4299299	2012-05-08	Valuations	Hearsay; Relevance
DX 533	July 16, 2012 Sterling Report on PPVA valuations as of June 30, 2012 (Q2 2012)	CTRL3492118	2012-07-16	Valuations	Hearsay
DX 534	Behre Dolbear Report on Desert Hawk	C-Plat-00040133	2012-09-01	Valuations	Hearsay
DX 535	Engagement Letter for 2012 Audit	C-Plat-00039234	2012-10-09	Valuations	Hearsay
DX 536	November 5, 2012 Sterling Report on PPVA valuations as of September 30, 2012 (Q3 2012)	CTRL4421738	2012-11-05	Valuations	Hearsay
DX 537	SS&C Investor Capital Detail for Partnership – December 2012	CTRL4462245	2012-12-01	Valuations	
DX 538	Engagement Partner Checklist for 2012 Audit	C-Plat-00039411	2012-12-31	Valuations	Hearsay
DX 539	Engagement Team Discussion for 2012 Audit	C-Plat-00040544	2012-12-31	Valuations	Hearsay
DX 540	Investment Process Narrative for 2012 Audit	C-Plat-00039314	2012-12-31	Valuations	Hearsay
DX 541	Planning Presentation for 2012 Audit	C-Plat-00039250	2012-12-31	Valuations	Hearsay
DX 542	Platinum Partners Value Arbitrage Fund (International) Limited and Subsidiary Consolidated Financial Statements Year Ended December 31, 2012	CTRL3649048	2012-12-31	Valuations	Hearsay
DX 543	Platinum Partners Value Arbitrage Fund (USA) L.P. Financial Statements Year Ended December 31, 2012	CTRL3649027	2012-12-31	Valuations	Hearsay
DX 544	Request for Valuation Services for 2012 Audit	C-Plat-00039281	2012-12-31	Valuations	Hearsay
DX 545	Understanding Internal Controls for 2012 Audit	C-Plat-00039289	2012-12-31	Valuations	Hearsay
DX 546	Understanding the Entity for 2012 Audit	C-Plat-00039283	2012-12-31	Valuations	Hearsay
DX 547	Use of Auditor's Experts (IDC) for 2012 Audit	C-Plat-00039248	2012-12-31	Valuations	Hearsay
DX 548	Use of Auditor's Experts (Bloomberg) for 2012 Audit	C-Plat-00039246	2012-12-31	Valuations	Hearsay
DX 549	January 2013 SS&C NAV	CTRL4410545	2013-01-01	Valuations	
DX 550	SS&C Investor Capital Detail for Partnership – January 2013	CTRL4438343	2013-01-01	Valuations	
DX 551	February 2013 SS&C NAV	CTRL4395250	2013-02-01	Valuations	
DX 552	February 21, 2013 Sterling Report on PPVA valuations as of December 31, 2012 (Q4 2012)	CTRL4421736	2013-02-21	Valuations	Hearsay
DX 553	March 2013 SS&C NAV	CTRL4430756	2013-03-01	Valuations	
DX 554	April 2013 SS&C NAV	CTRL4458222	2013-04-01	Valuations	
DX 555	SS&C Investor Capital Detail for Partnership – April 2013	CTRL4463621	2013-04-01	Valuations	
DX 556	D&M Report from BDO Workpapers	C-Plat-00040189	2013-05-01	Valuations	Hearsay
DX 557	May 2013 SS&C NAV	CTRL4597171	2013-05-01	Valuations	
DX 558	May 16, 2013 Sterling Report on PPVA valuations as of March 31, 2013 (Q1 2013)	CTRL4657796	2013-05-16	Valuations	Hearsay
DX 559	June 2013 SS&C NAV	CTRL4661760	2013-06-01	Valuations	
DX 560	July 2013 SS&C NAV	CTRL4606861	2013-07-01	Valuations	
DX 561	July 30, 2013 Sterling Report on PPVA valuations as of June 30, 2013 (Q2 2013)	CTRL4760091	2013-07-30	Valuations	Hearsay
DX 562	August 2013 SS&C NAV	CTRL4797089	2013-08-01	Valuations	
DX 563	September 2013 SS&C NAV	CTRL4805736	2013-09-01	Valuations	
DX 564	Engagement Letter for 2013 Audit	C-Plat-00039557	2013-09-17	Valuations	Hearsay
DX 565	October 2013 SS&C NAV	CTRL4825598	2013-10-01	Valuations	
DX 566	October 30, 2013 Sterling Report on PPVA valuations as of September 30, 2013 (Q3 2013)	CTRL4957010	2013-10-30	Valuations	Hearsay
DX 567	November 2013 SS&C NAV	CTRL4841308	2013-11-01	Valuations	
DX 568	December 2013 SS&C NAV	CTRL6084282	2013-12-01	Valuations	
DX 569	Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries Consolidated Financial Statements – Year Ended December 31, 2013	CTRL7709216	2013-12-01	Valuations	Hearsay

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 570	Audit Wrap-Up Presentation for 2013 Audit	C-Plat-00039760	2013-12-31	Valuations	Hearsay
DX 571	Black Elk Client Fair Value Analysis for YE 2013	C-Plat-00040034	2013-12-31	Valuations	Hearsay
DX 572	Black Elk Sensitivity Analysis for YE 2013 (Part 1)	C-Plat-00039984	2013-12-31	Valuations	Hearsay
DX 573	Black Elk Sensitivity Analysis for YE 2013 (Part 2)	C-Plat-00039985	2013-12-31	Valuations	Hearsay
DX 574	Client Reacceptance for 2013 Audit	C-Plat-00039560	2013-12-31	Valuations	Hearsay
DX 575	Engagement Partner Checklist for 2013 Audit	C-Plat-00039769	2013-12-31	Valuations	Hearsay
DX 576	Engagement Team Discussion for 2013 Audit	C-Plat-00039620	2013-12-31	Valuations	Hearsay
DX 577	FASB ASC 820 Review for PPVA for 2013 Audit (GGO, Black Elk)	C-Plat-00039970	2013-12-31	Valuations	Hearsay
DX 578	FASB ASC 820 Review for PPVA for 2013 Audit (Glacial)	C-Plat-00039969	2013-12-31	Valuations	Hearsay
DX 579	Financial Statement Notes for 2013 Reviewed by BDO	C-Plat-00040319	2013-12-31	Valuations	Hearsay
DX 580	Golden Gate Client Fair Value Analysis for YE 2013	C-Plat-00040156	2013-12-31	Valuations	Hearsay
DX 581	Golden Gate Sensitivity Analysis for YE 2013	C-Plat-00039987	2013-12-31	Valuations	Hearsay
DX 582	Golden Gate's Audited Financials for YE 2013	C-Plat-00040157	2013-12-31	Valuations	Hearsay
DX 583	Highlights Memo for 2013 Audit	C-Plat-00039749	2013-12-31	Valuations	Hearsay
DX 584	Original Sensitivity Analysis for Desert Hawk	C-Plat-00039989	2013-12-31	Valuations	Hearsay
DX 585	Planning Presentation for 2013 Audit	C-Plat-00039577	2013-12-31	Valuations	Hearsay
DX 586	Platinum Partners Value Arbitrage Fund (International) Limited and Subsidiary Consolidated Financial Statements Year Ended December 31, 2013	CTRL7709215	2013-12-31	Valuations	Hearsay
DX 587	Platinum Partners Value Arbitrage Fund (USA) L.P. Financial Statements – Year Ended December 31, 2013	CTRL7709217	2013-12-31	Valuations	Hearsay
DX 588	Request for Valuation Services for 2013 Audit	C-Plat-00039604	2013-12-31	Valuations	Hearsay
DX 589	Second Sensitivity Analysis for Desert Hawk	C-Plat-00039990	2013-12-31	Valuations	Hearsay
DX 590	Summary of BVA Sensitivity Valuation for 2013 Audit	C-Plat-00039972	2013-12-31	Valuations	Hearsay
DX 591	Supplemental Client Reacceptance for 2013 Audit	C-Plat-00039561	2013-12-31	Valuations	Hearsay
DX 592	Understanding Internal Controls for 2013 Audit	C-Plat-00039613	2013-12-31	Valuations	Hearsay
DX 593	Understanding the Entity for 2013 Audit	C-Plat-00039605	2013-12-31	Valuations	Hearsay
DX 594	January 2014 SS&C NAV	CTRL6273119	2014-01-01	Valuations	
DX 595	February 2014 SS&C NAV	CTRL6276889	2014-02-01	Valuations	
DX 596	March 2014 SS&C NAV	CTRL6156713	2014-03-01	Valuations	
DX 597	Spreadsheet titled "PPVA Q1 2014 Draft Valuation Supporting Analysis_v3"	CTRL5034418	2014-03-31	Valuations	Hearsay
DX 598	April 2014 SS&C NAV	CTRL6328537	2014-04-01	Valuations	
DX 599	David Steinberg Ex 465 - April 4, 2014 Email from Ezra Beren with subject: "Re: Valuation"	CNOCSL_01773769	2014-04-04	Valuations	
DX 600	April 15, 2014 Email from Marina Fedotova with subject: "Platinum / Golden Gate Oil 12/31 update"	PPVA_RH_0672341	2014-04-15	Valuations	Hearsay
DX 601	April 30, 2014 Sterling Report on PPVA valuations as of December 31, 2013 (Q4 2013)	CTRL6324638	2014-04-30	Valuations	Hearsay
DX 602	Sterling Report from BDO Workpapers	C-Plat-00039993	2014-04-30	Valuations	Hearsay
DX 603	May 2014 SS&C NAV	CTRL6026841	2014-05-01	Valuations	
DX 604	June 2014 SS&C NAV	CTRL6028454	2014-06-01	Valuations	
DX 605	June 16, 2014 Sterling Report on PPVA valuations as of March 31, 2014 (Q1 2014)	CTRL5683673	2014-06-16	Valuations	Hearsay
DX 606	PPVA First Quarter 2014 Valuation Report	CTRL5672365	2014-06-16	Valuations	Hearsay
DX 607	July 2014 SS&C NAV	CTRL4991036	2014-07-01	Valuations	
DX 608	DeGolyer and MacNaughton Appraisal Report as of December 31, 2013 on Certain Properties owned by Golden Gate Oil LLC	VRC_L0008895-9153 / PPVA_RH_0750090_0001-0259	2014-07-14	Valuations	Hearsay
DX 609	July 23, 2014 Email from Eli Rakower with subject: "PPVA Portfolio Valuation – March 2014"	CTRL5034417	2014-07-23	Valuations	Hearsay
DX 610	August 2014 SS&C NAV	CTRL5896698	2014-08-01	Valuations	
DX 611	Aug. 2014 Precious Capital GGO Agreement	C-Plat-00040164	2014-08-14	Valuations	
DX 612	September 2014 SS&C NAV	CTRL5896699	2014-09-01	Valuations	
DX 613	Sept. 2014 Precious Capital GGO Agreement	C-Plat-00040165	2014-09-02	Valuations	
DX 614	September 19, 2014 Sterling Report on PPVA valuations as of June 30, 2014 (Q2 2014)	CTRL6583975	2014-09-19	Valuations	Hearsay
DX 615	October 2014 SS&C NAV	CTRL5911677	2014-10-01	Valuations	
DX 616	November 2014 SS&C NAV	CTRL6448097	2014-11-01	Valuations	
DX 617	December 2014 SS&C NAV	CTRL6590575	2014-12-01	Valuations	
DX 618	Platinum Partners Valuation Policy (Update Approved 12/1/2014)	CTRL_SD_0230908	2014-12-01	Valuations	
DX 619	Platinum Partners Valuation Policy (Update Approved 12/23/2014)	CTRL_SD_1097358	2014-12-23	Valuations	
DX 620	CR2 2014 Workpapers	PPVA_RH_0447222	2014-12-31	Valuations	Hearsay
DX 621	Document titled "PPVA Valuation Opinion 12-31-14 Final v2.pdf"	CTRL6971314	2014-12-31	Valuations	Hearsay
DX 622	Platinum Partners Value Arbitrage Fund (International) Limited and Subsidiary Consolidated Financial Statements – Year Ended December 31, 2014	CTRL7528808	2014-12-31	Valuations	Hearsay
DX 623	Platinum Partners Value Arbitrage Fund (International) Limited and Subsidiary Consolidated Financial Statements Year Ended December 31, 2014	CTRL7537291	2014-12-31	Valuations	Hearsay

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 624	Platinum Partners Value Arbitrage Fund (USA) L.P. Financial Statements – Year Ended December 31, 2014	CTRL7528809	2014-12-31	Valuations	Hearsay
DX 625	Platinum Partners Value Arbitrage Fund L.P. and Subsidiaries Consolidated Financial Statements – Year Ended December 31, 2014	CTRL7537293	2014-12-31	Valuations	Hearsay
DX 626	January 2015 SS&C NAV	CTRL6696999	2015-01-01	Valuations	
DX 627	Jan. 29, 2015 Memo to K. McGowan re: Reserve Report Procedures for Black Elk	C-Plat-00040069	2015-01-29	Valuations	Hearsay
DX 628	Jan. 30, 2015 Memo re: Reserve Report Procedures for Golden Gate	C-Plat-00040184	2015-01-30	Valuations	Hearsay
DX 629	February 2015 SS&C NAV	CTRL6697057	2015-02-01	Valuations	
DX 630	Feb. 4, 2015 Memo re: Reserve Report Testing Procedures for Black Elk	C-Plat-00040068	2015-02-04	Valuations	Hearsay
DX 631	Feb. 19, 2015 VBA Review Memo	C-Plat-00040079	2015-02-19	Valuations	Hearsay
DX 632	February 22, 2015 Sterling Report on PPVA valuations as of September 30, 2014 (Q3 2014)	CTRL6681535	2015-02-22	Valuations	Hearsay
DX 633	March 2015 SS&C NAV	CTRL6787725	2015-03-01	Valuations	
DX 634	April 2015 SS&C NAV	CTRL6913461	2015-04-01	Valuations	
DX 635	A&M Engagement Letter	CTRL6704880	2015-04-16	Valuations	Hearsay
DX 636	May 2015 SS&C NAV	CTRL7035473	2015-05-01	Valuations	
DX 637	May 20, 2015 Sterling Report on PPVA valuations as of March 31, 2015 (Q1 2015)	CTRL7450171	2015-05-20	Valuations	Hearsay
DX 638	PPVA Valuation Opinion, dated May 20, 2015	CTRL7074278	2015-05-20	Valuations	Hearsay
DX 639	Daniel Saks Ex 451 - May 22, 2015 Email from Danny Saks with subject: "Desert Hawk Gold Corp Investment Memov1.docx" with attachment	BW-SHIP-01296991-BW-SHIP-01296992	2015-05-22	Valuations	Hearsay
DX 640	June 2015 SS&C NAV	CTRL7129417	2015-06-01	Valuations	
DX 641	June 11, 2015 Sterling Report on PPVA valuations as of December 31, 2014 (Q4 2014)	CTRL6963500	2015-06-11	Valuations	Hearsay
DX 642	June 26, 2015 A&M Report on Platinum valuations as of March 31, 2015 (Q1 2015)	CTRL7216235	2015-06-26	Valuations	Hearsay
DX 643	Document titled "PPVA Valuation Opinion 6-30-15 Draft (all)"	CTRL7309759	2015-06-30	Valuations	Hearsay
DX 644	July 2015 SS&C NAV	CTRL7261647	2015-07-01	Valuations	
DX 645	DeGolyer and MacNaughton Report as of December 31, 2014 on Reserves and Revenue of Certain Properties owned by Golden Gate Oil LLC	VRC_L0010206-10440 / PPVA_RH_0750136_0001-0235	2015-07-09	Valuations	Hearsay
DX 646	Platinum Partners Valuation Policy (Update Approved 8/10/2015)	CTRL_SD_0232882	2015-08-10	Valuations	
DX 647	August 12, 2015 Sterling Report on PPVA valuations as of June 30, 2015 (Q2 2015)	CTRL7424192	2015-08-12	Valuations	Hearsay
DX 648	September 2015 SS&C NAV	CTRL7451967	2015-09-01	Valuations	
DX 649	September 21, 2015 A&M Report on PPVA valuations as of June 30, 2015 (Q2 2015)	CTRL7564023	2015-09-21	Valuations	Hearsay
DX 650	October 2015 SS&C NAV	CTRL7544124	2015-10-01	Valuations	
DX 651	October 29, 2015 A&M Report on PPVA valuations as of September 30, 2015 (Q3 2015)	CTRL7595256	2015-10-29	Valuations	Hearsay
DX 652	November 2015 SS&C NAV	CTRL8013296	2015-11-01	Valuations	
DX 653	December 2015 SS&C NAV	CTRL8296283	2015-12-01	Valuations	
DX 654	CR2 2015 Workpapers	PPVA_RH_0447224	2015-12-31	Valuations	Hearsay
DX 655	VRC Presentation on Golden Gate Oil	VRC_L0010746-10752 / PPVA_RH_0750183_0001-0007	2015-12-31	Valuations	Hearsay
DX 656	January 2016 SS&C NAV	CTRL7803643	2016-01-01	Valuations	
DX 657	February 2016 SS&C NAV	CTRL7814081	2016-02-01	Valuations	
DX 658	March 2016 SS&C NAV	CTRL7882101	2016-03-01	Valuations	
DX 659	PPVA Oil and Gas – Valuation Memo	VRC_L0009955 / PPVA_RH_0750129	2016-04-12	Valuations	Hearsay
DX 660	April 28, 2016 Email from Shane Newell with subject: "RE: Platinum Partners - Northstar and Golden Gate Valuations"	VRC_L0010737 - 10745 / PPVA_RH_0750182_0001-0009	2016-04-28	Valuations	Hearsay
DX 661	June 9, 2016 A&M Report on PPVA valuations as of March 31, 2016 (Q1 2016)	CTRL8049261	2016-06-09	Valuations	Hearsay
DX 662	Engagement Letter Between GLC Advisors and PPVA Liquidators Bearing Bates No. AHAN_002691	Han Dep. Ex. 2	2016-12-19	Valuations	Hearsay; Relevance
DX 663	January 23, 2017 E-mail from Ms. Cao to Mr. Han, Bearing Bates No. AHAN_602	Han Dep. Ex. 5	2017-01-23	Valuations	Hearsay
DX 664	E-mail Dated February 15, 2017, Bates No. AHAN_775	Han Dep. Ex. 7	2017-02-15	Valuations	Hearsay
DX 665	E-mail Bearing Bates No. AHAN_001246	Han Dep. Ex. 4	2017-03-08	Valuations	Hearsay; Relevance
DX 666	E-mail Bearing Bates No. AHAN_001321	Han Dep. Ex. 8	2017-03-13	Valuations	Hearsay; Relevance
DX 667	PPVA Preliminary Valuation Review	Trott Dep. Ex. 128	2017-03-31	Valuations	Hearsay
DX 668	May 2017 E-mail, Bates No. AHAN_001939	Han Dep. Ex. 9	2017-05-19	Valuations	Hearsay
DX 669	E-mail Bearing Bates No. AHAN_002776	Han Dep. Ex. 6	2018-03-07	Valuations	Hearsay; Relevance
DX 670	E-mail bearing Bates No. AHAN_002965	Han Dep. Ex. 10	2018-09-18	Valuations	Hearsay; Relevance
DX 671	Second Amended Platinum Management operating agreement (in force 2011 forward)	CTRL1968806, ECF 530-1—Feuerstein Ex 3	2020-02-14	Valuations	
DX 672	Ellie Tinoco Bio from M&S Website	https://marshall-stevens.com/staff/ellie-tinoco/	n/a	Valuations	Hearsay

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 673	Jay Levy website bio	https://www.cohnreznick.com/people/jay-levy	n/a	Valuations	Hearsay
DX 674	John Czapla bio	https://www.valuationresearch.com/professionals/john-czapla/	n/a	Valuations	Hearsay
DX 675	Keith McGowan bio	https://www.bdo.com/our-people/keith-mcgowan	n/a	Valuations	Hearsay
DX 676	Murray Grenville bio from Sterling website	https://www.sterlingvaluationgroup.com/ceo/	n/a	Valuations	Hearsay
DX 677	191030 USA Capital Account Review - SS&C Tabs only	N/A - Bixter Daubert Ex. 1		Valuations	
DX 678	Audit Workpapers for YE 2014	PPVA_RH_0447221		Valuations	Hearsay
DX 679	Intermediate fund spreadsheet - SS&C Tabs only	Quintero Rpt.		Valuations	Failure to specifically identify exhibits
DX 680	Mark McMahon's bio (A&M)	https://www.alvarezandmarsal.com/our-people/mark-mcmahon		Valuations	Hearsay
DX 681	Metzger Report Exhibits	In Nathaniel's zip file		Valuations	Hearsay
DX 682	Notice of Subpoena	Han Dep. Ex. 1		Valuations	Relevance; Hearsay
DX 683	PGS LLC et al. v. AGH Parent LLC et al. complaint			Valuations	Hearsay
DX 684	Platinum Partners First Quarter 2015 Valuation Report from Alvarez	SAC, Exhibit 69		Valuations	Hearsay
DX 685	PPVA v. Goldberg complaint, No. 18-01650-scc (Bankr. S.D.N.Y.)			Valuations	Relevance; Hearsay
DX 686	SanFilippo Reconciliation memo	DEFEXP0000112		Valuations	Hearsay
DX 687	SS&C PPVA Intermediate Fund Comparative Trial Balances from 01/01/2013 to 03/31/2016	CTRL8013196; CTRL7880745; CTRL7804764; CTRL7810218; CTRL6448326; CTRL7327072; CTRL6787369; CTRL7129528; CTRL7035556; CTRL7452147; CTRL7544266; CTRL6996462; CTRL7261556; CTRL6696547; CTRL6696629; CTRL6447921; CTRL7240601; CTRL6023380; CTRL4994126; CTRL6310685; CTRL8282976; CTRL5674165; CTRL6272642; CTRL6207959; CTRL6109518; CTRL5798375; CTRL5911296; CTRL4832698; CTRL4375209; CTRL6283258; CTRL4428939; CTRL4394947; CTRL6323881; CTRL4629812; CTRL4428302; CTRL4637299; CTRL4640307; CTRL4814677		Valuations	
DX 688	SS&C PPVA Intermediate Fund Incentive Fee Reports from 01/01/2013 to 03/31/2016	CTRL7424830; CTRL7424829; CTRL7424425; CTRL7810220; CTRL7880747; CTRL7804766; CTRL8282978; CTRL6696631; CTRL7035558; CTRL6996464; CTRL6883319; CTRL7454564; CTRL7544268; CTRL8013198; CTRL6696549; CTRL4994128; CTRL5674167; CTRL5798377; CTRL5911298; CTRL6039863; CTRL6023382; CTRL6109520; CTRL6447923; CTRL6209537; CTRL6272644; CTRL6310687; CTRL6448328; CTRL4602482; CTRL4602478; CTRL4602480; CTRL6323883; CTRL4602484; CTRL4637301; CTRL4640309; CTRL4814679; CTRL4621709; CTRL4704226; CTRL4629814; CTRL4832700		Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 689	SS&C PPVA Intermediate Fund Management Fee Reports from 01/01/2013 to 03/31/2016	CTRL7880759; CTRL7810232; CTRL4994138; CTRL7804778; CTRL6696559; CTRL6696641; CTRL7035572; CTRL6996474; CTRL6883329; CTRL8013208; CTRL8282990; CTRL5911308; CTRL6209547; CTRL6272654; CTRL6310697; CTRL6023392; CTRL6039873; CTRL6109530; CTRL6599195; CTRL5674179; CTRL5798425; CTRL6447933; CTRL4642525; CTRL4704235; CTRL4629824; CTRL4637315; CTRL4640323; CTRL4394959; CTRL6323893; CTRL4428314; CTRL4814693; CTRL4832712; CTRL4375221		Valuations	
DX 690	SS&C PPVA USA Comparative Trial Balances from 01/01/2013 to 03/31/2016	CTRL8282671; CTRL8013568; CTRL7803807; CTRL7810142; CTRL6144411; CTRL5798431; CTRL5911182; CTRL6448221; CTRL4990559; CTRL6258178; CTRL6448401; CTRL5673870; CTRL6038076; CTRL6156892; CTRL6208288; CTRL6051250; CTRL6883404; CTRL7451904; CTRL7544217; CTRL7035626; CTRL6787867; CTRL7129083; CTRL7261349; CTRL6697295; CTRL6697117; CTRL7327211; CTRL7880800; CTRL4723418; CTRL4438333; CTRL4345654; CTRL6323756; CTRL4785955; CTRL4463611; CTRL4617128; CTRL4825009; CTRL4814532; CTRL4812117; CTRL4489265; CTRL4622128		Valuations	
DX 691	SS&C PPVA USA Incentive Fee Reports from 01/01/2013 to 03/31/2016	CTRL7810144; CTRL8034511; CTRL7803809; CTRL8282673; CTRL7327213; CTRL6697297; CTRL6697119; CTRL6787869; CTRL7129085; CTRL7261351; CTRL6883406; CTRL7451906; CTRL7544219; CTRL8013570; CTRL7911525; CTRL6144415; CTRL4990561; CTRL5673872; CTRL5798433; CTRL5911184; CTRL6038080; CTRL6051252; CTRL6448223; CTRL6156896; CTRL6208290; CTRL6258180; CTRL6448403; CTRL4438335; CTRL4345656; CTRL6323758; CTRL4463613; CTRL4812119; CTRL4617130; CTRL4814534; CTRL4622130; CTRL4723420; CTRL4785957; CTRL4825011; CTRL4489267		Valuations	

Bodner Ex. No.	Description	Doc. ID	Date	Topic	Plaintiffs Objections
DX 692	SS&C PPVA USA Management Fee Reports from 01/01/2013 to 03/31/2016	CTRL7880818; CTRL4990575; CTRL7803825; CTRL7810160; CTRL6697311; CTRL6697133; CTRL7451920; CTRL7544235; CTRL7035642; CTRL7129099; CTRL7261365; CTRL7327227; CTRL6883420; CTRL8013584; CTRL8282687; CTRL6787883; CTRL6156910; CTRL5911198; CTRL6208304; CTRL6258194; CTRL6038093; CTRL6051266; CTRL6144429; CTRL6448237; CTRL6448417; CTRL5673886; CTRL5798447; CTRL4723434; CTRL4785971; CTRL4489277; CTRL4463623; CTRL4617144; CTRL4814548; CTRL4812129; CTRL4622144; CTRL6323772; CTRL4825025; CTRL4438345; CTRL4345666		Valuations	
DX 693	Summary of Proposed Adjustments, signed by Nordlicht and SanFilippo	CTRL7492697		Valuations	Hearsay
DX 694	Transcripts of Investor Calls	CTRL_PPCCO_0000001- CTRL_PPCCO_0000016		Valuations	Hearsay
DX 695	USA Capital Spreadsheet - SS&C Tabs only	Quintero Rpt.		Valuations	Failure to specifically identify exhibits
DX 696	Use of Management's Experts (D&M)	C-Plat-00040187		Valuations	Hearsay

EXHIBIT D

BENCH MEMORANDUM FROM DAVID BODNER REGARDING CALCULATION OF DAMAGES BASED UPON INFLATED MANAGEMENT AND INCENTIVE FEES

David Bodner respectfully submits this memorandum with the joint pre-trial consent order (“JPTO”) in an effort to simplify the role of the jury in the complex damages part of this case.

I. IN THE EVENT THE JURY FINDS ANY OVERVALUATION, THE COURT AND PARTIES CAN EASILY CALCULATE DAMAGES POST-TRIAL

Bodner submits that the jury should not be asked to engage in complex calculations for inflated management and incentive fees. In the event that the jury finds that Bodner was a fiduciary, and came to learn that one or more of the six PPVA positions at issue was fraudulently overstated by Platinum Management, the Court and parties can compute the damage using basic mathematics based on undisputed facts. All the jury should be asked to do, if it determines liability, is determine: (i) whether the six positions were fraudulently overvalued; (ii) at what point in time; (iii) when Bodner came to learn of it; and (iv) the amount of inflation. Bodner has included in the JPTO a special verdict sheet to assist the jury in this regard. Bodner submits that the jury’s role can be substantially simplified, with no prejudice to either party, by taking these calculations away from the jury.

This is because the amount of fees paid in cash should not be in dispute. Once the jury finds overvaluation on a particular date (assuming Bodner’s knowledge of it and the existence of a duty to act), the management fee would be calculated as 2% of the inflationary amount that was actually paid in cash by PPVA, calculated on a monthly basis ($1/12 * 2\% * [\text{monthly overvaluation}]$). There are two exceptions that illustrate why this math is not for the jury: (i) in December 2015, the oil and gas assets (60% of the total fund NAV) were placed into a side pocket, reducing the management fee from 2% to 1.5% for those assets for the last four

months of the Damages Period; and (ii) at the conclusion of the Damages Period (March 31, 2016), due to low liquidity at PPVA, \$5,537,121 in charged management fees were accrued but unpaid. The parties and Court can sort the impact of these adjustments post trial.¹

The incentive fee damage would be calculated similarly: the Court would take 20% of the inflationary amount that was actually paid in cash by PPVA. There will be FIFO/LIFO issues with respect to incentive fee redemptions by Nordlicht and Landesman in 2014, where they took withdrawals in cash from their capital accounts, but those accounts contained both an allocation of earlier-year incentive fees and other investments/subscriptions. These calculations are not complex mathematically but for the parties to sufficiently educate the jury on the data and the nuances would serve no purpose because there is no dispute on the basic facts. They should be addressed post-trial based on the trial evidence.

II. MANAGEMENT FEES

Management fees were charged to the limited partners of the PPVA feeder funds (the “Onshore Feeder” and “Offshore Feeder” and together the “Feeder Funds”) on a monthly basis at 0.167% per month (2% per year) based on the NAV of their accounts. The management fees charged by Platinum Management to the Feeder Funds in the Damages Period, in total, are as follows:

¹ The JOL’s claim, in their section of the JPTO, damages from inflated management fees in the amount of \$15,844,000 (*supra* § V.C), but that amount incorrectly includes \$338,000 associated with the Over Everything position, which the Court ruled at *Daubert* may not be the subject of expert valuation testimony. (Quintero Report at 17 (Table 1); *Daubert* Opinion (ECF No. 646) at 3). Taking into account the unpaid accrued management fees in the amount of \$5,537,121, the maximum damages associated with inflated management is no greater than \$9,968,879.

Mgmt Fees <i>Charged</i> (\$000)	2013	2014	2015	YTD 3/2016	TOTAL
	14,138	15,078	14,757	2,961	46,934

(Quintero Ex. 21; Financial Statements for Onshore and Intermediate Funds, 2013-2014). The total management fees actually paid by PPVA, however, are as follows, which accounts for the fact that \$5,537,121 remained accrued but unpaid as of March 31, 2016:

Mgmt Fees <i>Paid</i> (\$000)	2013	2014	2015	YTD 3/2016	TOTAL
	14,138	15,078	12,181	0	41,397

(Quintero Ex. 21; SS&C Management Fee Reports to Feeder Funds, March 31-April 30, 2016).

III. INCENTIVE FEES

The governing fund documents of the Feeder Funds provide that the limited partners shall allocate to the General Partner an amount equal to 20% of the increase in NAV on an annual basis. The General Partner's incentive allocation is, for accounting purposes, a liability of the Feeder Funds. When the General Partner pays an incentive fee in cash, it makes a redemption from PPVA.

In periods where liquidity is lacking, the General Partner distributed all or a portion of the accrued incentive fees "in kind," i.e., in the form of limited partnership interests in the Onshore Feeder ("Feeder Fund Interests"), to its members. Such allocations of Feeder Fund Interests are not a damage to PPVA, as they have no impact on PPVA. If a member of the General Partner redeems unearned (inflated) incentive fees for a cash payment, Bodner acknowledges that it is properly characterized as a damage to PPVA.

A. 2013 Incentive Fees²

Over the course of 2013, the General Partner accumulated \$7,391,417.15 in incentive fees from the Onshore Fund, and \$11,473,970 in incentive fees from the Offshore Fund.³ In January 2014, the General Partner re-allocated \$5,465,388 of Feeder Fund Interests to the General Partner's members, and distributed \$13,400,000 to its members in cash.

1. *Non-Cash Distributions of 2013 Feeder Fund Interests*

Of the 2013 Feeder Fund Interests, Uri Landesman received an allocation of \$3,719,000. He made one redemption of \$850,000 in February 2014. QR-USA, Landesman Tab, and Feb. 2014 Tab. PPVA paid the cash on March 5, 2014. QR-USA, Landesman Tab. At that time, however, Landesman had \$9,310,000 in his capital account, including \$5,591,000 from accumulated investments from earlier years (2012 and prior). QR-USA, Feb. 2014 Tab. Thus, on a FIFO basis, the \$850,000 he withdrew in February/March 2014 would not be deemed 2013 fees. He had ample "clean" money in his account such that there is no good reason to conclude that the \$850,000 he withdrew in February/March was "tainted" as connected to the 2013 incentive fees.

Nordlicht redeemed \$2,500,000 in May 2014. QR-USA, Nordlicht Tab, and May 2014 Tab. PPVA paid the cash on June 2, 2014. The JOLs count the entire amount as a 2013 incentive fee withdrawal, but that is wrong. The maximum amount that could be deemed 2013 incentive fees is \$1,083,982.55, the amount of 2013 fees allocated to Nordlicht (through his

² The JOLs contend that 2012 incentive fees are in the case insofar as amounts received by Grosser Lane Management LLC ("Grosser Lane") (a company owned by Bodner and his wife) could be "equitably disgorged" from Bodner under the faithless servant doctrine (*supra* § II.A & V.A). Bodner filed a motion *in limine* to dispose of that issue as well. (ECF No. 746).

³ These amounts are stated inclusive of intra-year income allocated to the General Partner account over the course of 2012.

family entity, NIII) by the General Partner in January 2014. Moreover, as with Landesman, the payment should not be characterized as connected to the 2013 incentive fees because Nordlicht had ample “clean” money in his account. The balance in the NIII account at the time it received the January 2014 distribution of 2013 Feeder Fund Interests from the General Partner was \$5,105,006, accumulated from prior years’ investments or allocations of incentive fees (2012 and earlier). After the distribution of 2013 fees, the balance was \$6,188,989. On a FIFO basis, the redemption by Nordlicht in May 2014 was clean money. Only under a LIFO basis could Nordlicht be deemed to have withdrawn 2013 fees, and in that case a maximum of \$1,083,983, not the \$2,500,000 that the JOLs contend is recoverable as damage.

In sum, of the 2013 incentive fees allocated in kind, the maximum the JOLs could claim that Landesman withdrew is \$850,000, and for Nordlicht, \$1,083,982.55. But the JOLs have to establish that LIFO should apply, or else the Landesman and Nordlicht distributions cannot be deemed 2013 incentive fees. We submit that these issues should be addressed post-trial.

2. *Cash Distributions*

The General Partner caused cash payments to be made to the General Partners’ members of the entirety of the Offshore Fund 2013 incentive fee accrual, plus the undistributed balance of the Onshore Fund 2013 incentive fees. The total distribution was \$13,400,000 and was made on February 21, 2014. (ECF No. 640 at 26). Bodner acknowledges that these are potential damages if there is a jury finding of overvaluation in the 2013 NAVs that was known to Bodner.

B. 2014 Incentive Fees

Over the course of 2014, the General Partner earned \$4,238,286.95 in incentive fees from the Onshore Fund and \$6,996,156.69 from the Offshore Fund. QR-USA, Jan. 2015

Tab. In January 2015, the accrued fees were aggregated in the General Partner's account in the Onshore Fund, and distributed to its members in-kind as Feeder Fund Interests.

The JOLs do not contend that any portion of the 2014 fees were paid in cash. They point to \$81,000 in 2015 payments to so called "Bad Actors" but those are redemptions by family members who did not receive incentive fees, directly or indirectly. QR-USA, GP Capital Tab. The \$81,000 is not incentive fee damage. There are no incentive fee damages based upon 2014 performance because PPVA never paid the fees.

C. 2015 Incentive Fees

The General Partner earned \$2,437,002.27 from the Onshore Fund and \$2,678,864.78 from the Offshore Fund in 2015. In January 2016, after aggregating these balances in the Onshore Fund, the General Partner distributed \$4,921,966.06 to certain of the General Partner's members (not Bodner or Grosser Lane) in the form of Feeder Fund Interests. QR-USA, Jan. 2016 Tab. The 2015 Feeder Fund Interests were never redeemed for cash, and no amount of the 2015 incentive fees were distributed in cash.

IV. CONCLUSION

Bodner submits that taking mathematical damages calculations away from the jury would streamline the trial, simplify the jury's role, and limit the risk of inconsistent jury verdict.

Dated: November 23, 2022
New York, New York

CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP

By: /s/ Eliot Lauer
Eliot Lauer
Gabriel Hertzberg
Julia Mosse
Nathaniel Ament-Stone
101 Park Avenue
New York, New York 10178
Tel.: (212) 696-6000
Fax: (212) 697-1559
Email: elauer@curtis.com
ghertzberg@curtis.com
jmosse@curtis.com
nament-stone@curtis.com

Attorneys for Defendant David Bodner

Exhibit E. Parties' Deposition Designations and Objections Thereto

Numbers below such as "401," "403," and "802" refer to Federal Rules of Evidence. "PK" refers to the deponent's lack of personal knowledge. "FRCP 56" refers to issues already adjudicated by the Court in its Summary Judgment Order (ECF No. 624).

A. Deposition Designation of Randall Katzenstein, taken November 15, 2019

For the reasons given in the Joint Pre-Trial Consent Order, Defendant objects to this designation. In the event this Court permits Plaintiffs to offer deposition testimony from Katzenstein, Defendant makes the below particularized objections and counter-designations.

<i>Plaintiffs' Designation</i>	<i>Defendant's Objection(s)</i>	<i>Defendant's Designation</i>	<i>Plaintiffs' Objection(s)</i>
54:9-55:12	401, 802, FRCP 56	30:10-30:15	
55:17-56:3	401, FRCP 56, PK	30:18-30:19	
56:7-56:12	401, FRCP 56, PK	49:2-50:5	
67:24-69:8	401, FRCP 56, PK	50:20-51:18	
70:3-70:25	401, FRCP 56, 802, PK	61:3-24	106, 401
		87:22-88:2	

B. Deposition Designation of Michael Katz, taken November 19, 2019

For the reasons given in the Joint Pre-Trial Consent Order, Defendant objects to this designation. In the event this Court permits Plaintiffs to offer deposition testimony from Katz, Defendant makes the below particularized objections and counter-designations.

<i>Plaintiffs' Designation</i>	<i>Defendant's Objection(s)</i>	<i>Defendant's Designation</i>	<i>Plaintiffs' Objection(s)</i>
20:7-20:24	401, 802	18:2-19:25	
28:15-28:19		20:25-21:4	
33:10-33:16	403, 802	33:17-33:18	
34:21-36:2	403, 802, PK	36:4-36:8	
36:16-36:25	403, 802	37:18-39:22	
43:5-43:10	401, 403, PK	44:24-45:4	401, 403
43:14-44:22	401, 403	48:8-48:9	
47:19-48:7	403, 802	53:21-53:23	
52:23-53:20	403, 802	55:6-55:7	
54:16-55:5	401, 403, 802	60:3-60:25	
56:19-57:15	401, 403, 802	63:8-63:10	
58:9-60:2	802, PK	65:14-66:9	
62:14-63:7	401, 403, 802	68:7-68:8	
63:16-63:25	401, 403	69:15-69:21	
65:3-65:13	401, FRCP 56	70:14-70:15	
66:10-67:2	401, FRCP 56	96:6-96:9	

67:11-68:6	401, FRCP 56, 802	108:20-108:21	
70:10-70:13	401, 403, PK	182:11-184:17	
74:12-74:17	401, 403, PK	186:5-186:12	
76:7-77:5	401, 403	198:14-199:10	
93:6-95:5	401, PK	200:22-201:7	
95:25-96:4	401	204:10-25	
101:8-101:14	401, FRCP 56	206:9-206:17	
108:6-108:19	401, FRCP 56, 802	211:12-212:13	
113:15-115:4	401, FRCP 56	213:5-215:10	
171:13-172:9	401, FRCP 56, PK	216:13-19	
257:23-261:18	401, 403, 802, FRCP 56, PK	223:11-223:17	
262:18-265:25	401, 403, 802, PK	229:6-230:7	
266:10-269:9	401, 403, 802, PK	230:21-231:19	
275:21-276:23	802, PK	232:4-232:25	
		233:25-234:6	
		236:11-237:10	
		240:6-241:16	
		242:24-246:20	
		248:3-249:4	
		249:24-250:3	
		262:8-262:10	401
		270:8-270:19	106
		280:4-280:10	
		282:20-282:22	

C. Deposition of Maggie McGovern-Muller, taken October 24, 2019

<i>Plaintiffs' Designation</i>	<i>Defendant's Objection(s)</i>	<i>Defendant's Designation</i>	<i>Plaintiffs' Objection(s)</i>
9:4-9:8		54:21-54:23	
10:20-10:25		55:9-55:11	
59:24-60:22	401	71:6-72:9	
61:17-63:3	401	72:23-76:11	401
65:21-68:2	401	83:17-83:20	106, 401
70:6-71:5	401	86:21-87:19	106, 401, 802, PK
93:20-93:21	401	93:22-94:25	
104:4-104:17	401	95:23-98:6	401
194:5-196:7	401, 802		