

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
SECURITIES AND EXCHANGE :
COMMISSION, :
 :
Plaintiff, :
 :
-v- :
 :
PLATINUM MANAGEMENT (NY) LLC; : No. 16-cv-6848 (BMC)
PLATINUM CREDIT MANAGEMENT, L.P.; :
MARK NORDLICHT; :
DAVID LEVY; :
DANIEL SMALL; :
URI LANDESMAN; :
JOSEPH MANN; :
JOSEPH SANFILIPPO; and :
JEFFREY SHULSE, :
 :
Defendants. :
-----X

NOTICE OF THE (I) PROPOSED SALE OF THE RECEIVERSHIP’S RIGHTS IN AND TO LC ENERGY FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS AND (II) PROCEDURES FOR THE FILING OF CLAIMS AGAINST LC ENERGY AND/ OR ITS ASSETS AND THE RESOLUTION THEREOF

PLEASE TAKE NOTICE that:

1. On January 17, 2019, the United States District Court for the Eastern District of New York (the “*Court*”) entered an order (I) (a) authorizing Melanie L. Cyganowski, as Receiver (the “*Receiver*”) for Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd and Platinum Partners Credit Opportunities Fund International (A) Ltd (collectively, the “*Receivership Entities*”) to sell the Receivership’s rights in and to LC Energy Operations LLC, LC Energy Holdings LLC and/ or their assets (collectively, “*LC Energy*”) free and clear of all liens, claims, encumbrances and other interests; (b) authorizing the Receiver to enter into a stalking horse agreement and approving certain bid protections in connection therewith; (c) approving the form and manner of notice of the sale; (d) approving certain procedures for the filing of claims against LC Energy and the resolution thereof and (e) approving bid procedures for the sale of LC Energy upon the selection of a stalking horse.

2. Should you wish to learn more about LC Energy and bid on its assets, you should contact Richard Saltzman of Houlihan Lokey by telephone at (212) 497-4100 or by email at

RSaltzman@HL.com.

3. IF YOU BELIEVE YOU HOLD A CLAIM (DEFINED BELOW) DIRECTLY AGAINST LC ENERGY, THE DEADLINE FOR FILING A CLAIM IS MARCH 4, 2019 AT 5:00 P.M. (ET) (THE “LC ENERGY CLAIMS BAR DATE”).

4. If you believe you have (1) a claim to a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, mature, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured, *against LC Energy and/ or its assets* or (2) a claim to a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured, *against LC Energy and/ or its assets* (together, a “**Claim**”), you **must** file a Claim by the LC Energy Claims Bar Date as set forth below.

5. THERE WILL BE A SEPARATE CLAIMS BAR DATE FOR CLAIMS AGAINST THE RECEIVERSHIP ENTITIES AS OPPOSED TO AGAINST LC ENERGY. ACCORDINGLY, YOU SHOULD NOT FILE A CLAIM IF YOU DO NOT BELIEVE YOU HAVE A CLAIM DIRECTLY AGAINST LC ENERGY.

6. Any Claim asserted against LC Energy must be served via electronic and regular mail so that it is **actually received** by the LC Energy Claims Bar Date on: (i) Erik Weinick, Esq., Otterbourg, P.C., 230 Park Avenue, New York, NY 10169, Email: eweinick@otterbourg.com and (ii) Brent Weisenberg, Esq., Platinum Partners, 230 Park Avenue, Third Floor West, Suite 323, New York, NY 10169, Email: bweisenberg@platinumlp.com. Any Claim being asserted must state the Claim amount and summarize the basis for the Claim.

7. Any claimant who is required to submit a Claim, but fails to do so by the LC Energy Claims Bar Date, shall be forever barred, estopped, and enjoined to the fullest extent allowed by applicable law from asserting, in any manner, such Claim against LC Energy and its successors, agents, assigns, officers, directors, shareholders, employees and representatives and its property; shall not be permitted to object to any distribution plan proposed by the Receiver on account of such Claim; shall be denied any distributions under any distribution plan implemented by the Receiver on account of such Claim; and shall not receive any further notices on account of such Claim. Further, if a claimant is required to submit a Claim but fails to do so by the LC Energy Claims Bar Date, then LC Energy and its successors, agents, assigns, officers, directors, shareholders, employees and representatives and its property will be, and hereby are, discharged from all indebtedness or liability with respect to such Claim.

8. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM AGAINST LC ENERGY OR THAT THE RECEIVER OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

9. If you have any questions relating to this Notice, please feel free to contact the Receiver by emailing her at platinumreceiver@otterbourg.com.

Dated: January 17, 2019

OTTERBOURG P.C.

By: /s/ Adam C. Silverstein
Adam C. Silverstein
Erik B. Weinick
230 Park Avenue
New York, New York 10169
Tel.: (212) 661-9100
Fax: (212) 682-6104
asilverstein@otterbourg.com
eweinick@otterbourg.com

*Attorneys for Melanie L. Cyganowski, as
Receiver*