

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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

**NOTICE OF MOTION FOR AN ORDER  
(I) PERMANENTLY ENJOINING ANY PROSECUTION OF CLAIM NO. 145, (II)  
CONFIRMING THE RECEIVER’S DISALLOWANCE OF CLAIM NO. 145, AND (III)  
CONFIRMING THE RECEIVER’S AUTHORITY TO CONSENT TO THE RELEASE  
OF THE INDEMNITY ESCROW AMOUNT**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

On March 18, 2022, Melanie L. Cyganowski, as Receiver for the Receivership Entities<sup>1</sup> in the above-captioned action, has moved the United States District Court for the Eastern District of New York for entry of an order permanently enjoining any prosecution of Claim No. 145 against the Receivership Entities, submitted by BAM Administrative Services, LLC as agent for (i) PBLA ULICO 2017, (ii) BBIL ULICO 2014, and (iii) OMNIA Ltd; confirming the Receiver’s disallowance of Claim No. 145; and authorizing the Receiver to release \$4,530,155.68, currently held in escrow, to Senior Health Insurance Company of Pennsylvania, in Rehabilitation.

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<sup>1</sup> The “*Receivership Entities*” are Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund L.P., 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.

**If you do not file an opposition to the motion in the above-captioned action by May 9, 2022, you may be irrevocably disallowed from prosecuting the Receiver's disallowance of this claim.**

Dated: March 18, 2022

**OTTERBOURG P.C.**

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*Attorneys for Melanie L. Cyganowski, as  
Receiver*