

# EXHIBIT I

**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)

**[PROPOSED] ORDER GRANTING THE RECEIVER’S MOTION FOR ENTRY  
OF AN ORDER (A) APPROVING SETTLEMENT AGREEMENTS WITH (1)  
CNO FINANCIAL GROUP, INC. AND RELATED PARTIES, AND (2) SENIOR  
HEALTH INSURANCE COMPANY OF PENNSYLVANIA AND FUZION  
ANALYTICS, INC., AND (B) APPROVING USE OF FUNDS**

On July 1, 2020, Melanie L. Cyganowski, as the duly appointed Receiver (the “*Receiver*”) of Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP (“*PPCO*”), Platinum Partners Credit Opportunities Fund (TE) LLC (“*TE Feeder*”), Platinum Partners Credit Opportunities Fund LLC (“*US Feeder*”), Platinum Partners Credit Opportunities Fund (BL) LLC (“*Blocker*”), Platinum Partners Credit Opportunities Fund International Ltd. (“*Int’l Feeder*”), Platinum Partners Credit Opportunities Fund International (A) Ltd. (“*Int’l (A) Feeder*”), Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., and Platinum Partners Liquid Opportunity Master Fund L.P. (collectively, the “*Receivership Entities*”), previously filed a motion (Docket No. 535) (the “*Motion*”) for entry of an Order:

- approving a settlement agreement (the “*CNO Settlement Agreement*”), a copy of which is attached as **Exhibit A** to the Declaration of Melanie L. Cyganowski, as Receiver (the “*Receiver Decl.*”), dated as of July 1, 2020, between (1) the Receiver and the PPCO Receivership Entities, on one hand, and (2) CNO Financial Group, Inc., Bankers Conesco Life Insurance Company, Washington National Insurance Company, 40|86 Advisors, Inc., and BRe WN**IC 2013** LTC Primary, BRe WN**IC 2013** LTC Sub, BRe BCLIC Primary and BRe BCLIC Sub, as represented by Wilmington Trust, in its capacity as their former custodian (collectively, the “*CNO Parties*”), on the other hand;
- approving a settlement agreement (the “*SHIP Settlement Agreement*,” together with the CNO Settlement Agreement, collectively, the “*Settlement Agreements*”), a copy of which is attached to the Receiver Decl. as **Exhibit B**, dated as of July 1, 2020, between (1) the Receiver, on behalf of the Receivership Entities and Subsidiaries, on one hand, and (2) Senior Health Insurance Company of Pennsylvania (“*SHIP*”) and Fuzion Analytics, Inc. (collectively the “*SHIP Parties*”), on the other hand;
- authorizing the Receiver to pay \$14 million payable to SHIP in accordance with the terms of the SHIP Settlement Agreement (the “*Settlement Amount*”);
- authorizing the Receiver to use up to \$1.8 million (approximately 11.8% of the Settlement Amount) of funds from PPCO’s subsidiaries ALS Capital Ventures, LLC (“*ALS*”) and/or ALS Life Holdings LLC (“*ALS Life*”), including funds in ALS’ operating account (the “*ALS Operating Account*”) to fund the Settlement Amount, and to use funds of PPCO to fund the remainder of the Settlement Amount; and
- granting such other and further relief as the Court deems just.



funds in the ALS Operating Account to fund the Settlement Amount, and to use funds of PPCO to fund the remainder of the Settlement Amount.

5. The terms of this Order shall be binding upon the Receiver, the CNO Parties, the SHIP Parties, the subsidiaries of PPCO, ALS, ALS Life, Credit Strategies, LLC and its members, Principal Growth Strategies LLC and its members, OMNIA Ltd., PBLA ULICO 2017, and BBIL ULICO 2014, and any other person receiving actual notice of the Motion, any holder of a claim against the Receivership Entities, and any affiliates, successors, assigns of any of the foregoing.

6. This Order shall be effective and enforceable immediately upon entry.

7. This Court retains jurisdiction with respect to all matters arising from or related to the Settlement Agreements and the implementation of this Order.

Dated: July 17, 2020  
Brooklyn, New York

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THE HON. BRIAN M. COGAN  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK