

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION	:	No. 18 Civ. 6658 (JSR)
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	:	
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	:	No. 18 Civ. 10936 (JSR)
PARTNERS VALUE ARBITRAGE FUND L.P. (in	:	
OFFICIAL LIQUIDATION),	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
PLATINUM MANAGEMENT (NY) LLC, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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**DEFENDANT DAVID BODNER’S PROPOSED VOIR DIRE REQUESTS**

Pursuant to Rule 8 of the Individual Rules of Practice of the Honorable Jed S. Rakoff, Defendant David Bodner respectfully submits the following proposed *voir dire* requests:

1. You have been given a list of the parties involved in this lawsuit.
  - a. Have you previously heard or read about any of the parties on the list?
  - b. Have you or an immediate family member or close personal friend ever had a business or personal relationship with any of the parties on the list?
  - c. Do you have any positive or negative feelings towards any of the parties on the list?
  
2. You have been given a list of the attorneys and law firms involved in this lawsuit.

- a. Are you related to, or personally acquainted with, any of those attorneys, or have you ever been represented by any of those attorneys or other members of the listed law firms?
3. You will hear from or about several other people and entities during the course of this trial. Do you know, or know of, any of the following:
- a. William Post
  - b. FTI Consulting
  - c. Bernard Fuchs
  - d. Jed Latkin
  - e. Seth Gerszberg
  - f. Mark Nordlicht
  - g. Kerry Propper
  - h. Scott Taylor
  - i. Randall Katzenstein
  - j. Michael Katz
  - k. Maggie McGovern Muller
  - l. Naftali Manela
  - m. Angela Albanese
  - n. Naomi Bodner
  - o. Ronald Quintero
  - p. R.G. Quintero & Co.
  - q. Chartered Capital Advisors
  - r. Murray Huberfeld

- s. Mark Feuer
- t. David Levy
- u. David Ottensoser
- v. Abe Han
- w. GLC Advisors
- x. Daniel Small
- y. David Steinberg
- z. Joseph SanFilippo
- aa. Keith McGowan
- bb. BDO
- cc. Eleonora Tinoco
- dd. Jennifer Lange
- ee. CohnReznick
- ff. John Czapla
- gg. Valuation Research Corporation
- hh. Murray Grenville
- ii. Sterling Valuation Group
- jj. Mark McMahan
- kk. Alvarez & Marsal
- ll. Isaac Neuberger
- mm. George Duch
- nn. Michelle Keyes
- oo. Bart Schwartz

pp. Guidepost Solutions

qq. Leon Metzger

rr. Jay Levy

ss. Sze Tam

tt. Suzanne Horowitz

uu. Joshua Geller

vv. Christian Thomas

ww. Dhruv Narain

xx. Marcos Katz

yy. Harvey Werblowsky

zz. Uri Landesman

aaa. Eli Rakower

bbb. Michael Goldberg

ccc. Ari Hirt

ddd. Ezra Beren

eee. Kevin Cassidy

fff. Michael Nordlicht

ggg. Daniel Saks

hhh. Moshe Feuer

iii. R&H Restructuring

jjj. Illumin Capital Management

kkk. Black Elk

lll. Golden Gate Oil

mmm. Desert Hawk  
nnn. Northstar  
ooo. Pedevco  
ppp. Beechwood  
qqq. DeGolyer & McNaughton  
rrr. Grosser Lane Management  
sss. Mark Nordlicht Grantor Trust  
ttt. Monsey Equities  
uuu. SS&C Technologies.  
vvv. Schulte Roth & Zabel  
www. Dechert

4. Have you heard or read about this case or think you might have heard or read about this case?
5. What is the last grade of school, including college or graduate school, that you finished?
6. If you attended college, and if applicable, graduate school, please provide the name of the college and graduate school, major area of study, and degree(s), if any.
7. What is your current employment status?
8. Please list your employment history for the past ten (10) years beginning with the most recent. Please specify your employer, job title, job duties, and whether you had any management responsibilities. If you are retired or unemployed, please list your employment history for the ten (10) years before your retirement or unemployment.
9. If you are married, or sharing a household with another adult, please describe that person's occupation or employment, name of the employer, and what type of business it is. If

retired or unemployed, please state that person's main occupation and employer when last employed.

10. What are or were your parents' occupations?

11. Do you have children? If any of your children work, what is their occupation?

12. Please describe your hobbies or what you like to do during your free time, for example, read, go to movies, jog, travel, etc.

13. Please list any clubs, groups, or other organizations to which you belong, including whether you hold a leadership or managerial role.

14. Please list any newspapers or magazines you read regularly, radio talk shows you listen to regularly, podcasts, and favorite TV programs.

15. How do you primarily get your news? Through a newspaper, the internet, television, radio, or through some other means?

16. Do you or any members of your family have any legal training or experience or any kind? If so, please explain.

17. Do you or any members of your family have any finance or accounting training or experience of any kind? If so, please explain.

18. Have you or any members of your family ever owned a business? If yes, what type of business? What percentage of the business did you or your family members own?

19. Please describe any experience you, a close friend, family member, or employer ever had as a plaintiff or defendant in a lawsuit, or as a witness in a lawsuit, including where, when, type of case, and the outcome.

20. Have you ever served as a juror before? If yes, how many times? What kind of case? Did you reach a verdict? Were you the foreperson of the jury?

21. Defendant David Bodner is a member of the Orthodox Jewish community. Have you, or a friend or relative, had any experience with that community that you believe reflects negatively or positively upon that community?

22. Do you believe that if a person has business partners who were convicted of crimes, it reflects upon the character of that person who was not accused of, charged with, or convicted of a crime?

23. Do you believe that if a person has a minority ownership interest in a company, that person has the ability to control the business or affairs of the company?

24. Do you believe that you cannot fairly decide this case because of prejudice, bias, or other identification with individuals based on how much money they have?

25. Are there any facts or circumstances that you believe the Court or the parties to this case should know that might affect your ability to serve as a fair and impartial juror in this case?

Dated: November 25, 2022  
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

By: /s/ Eliot Lauer

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