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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, Plaintiff, -v- BEECHWOOD RE LTD., et al., Defendants.	18-cv-06658 (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), Plaintiffs, -v- PLATINUM MANAGEMENT (NY) LLC, et al., Defendants.	18-cv-10936 (JSR)

NOTICE OF MOTION TO DISMISS ON GROUP PLEADING GROUNDS BY DEFENDANTS BEECHWOOD CAPITAL GROUP LLC, B ASSET MANAGER II LP, BBLN-PEDCO CORP., AND BHLN-PEDCO CORP.

PLEASE TAKE NOTICE that Defendants Beechwood Capital Group LLC, B Asset Manager II LP, BBLN-PEDCO Corp., and BHLN-PEDCO Corp. (the "Beechwood Movants"), upon the accompanying Memorandum of Law, will move, by and through their undersigned counsel, before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 14B, New York, New York 10007, at such date as the Court will determine, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with prejudice the First Amended Complaint of Plaintiffs Martin Trott and Christopher Smith, as the 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).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's January 24, 2019 Order:

- Plaintiffs must file their answering papers (if any) by February 11, 2019;
- Defendants must file their reply papers by February 15, 2019;
- Oral argument on the group motions to dismiss shall be heard on February 25, 2019 at 3:00 p.m.

Dated: February 4, 2019
Kew Gardens, New York

LIPSIUS BENHAIM LAW LLP

By: _____

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To: All counsel of record (via ECF)