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May 15, 2017

Chief Judge Dora L. Irizarry United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

## Re: SEC v. Platinum Management (NY) LLC et al., Civil Case No. 16-cv-6848 (DLI)(VMS)

Dear Chief Judge Irizarry:

We are counsel to Bart M. Schwartz (the "Receiver"), the court-appointed receiver for defendant Platinum Credit Management, L.P. ("Platinum Credit") and certain related entities (collectively, the "Receivership Entities"). We write regarding the first quarterly fee applications to this Court to be submitted by the Receiver, Guidepost Solutions LLC, and Cooley LLP (the "Receivership Professionals") for allowance of compensation for the period starting December 19, 2016 through March 31, 2017 (the "First Interim Fee Applications").

SEC Staff has requested that the Receivership Professionals delay filing the First Interim Fee Applications until an upcoming supplemental submission to this Court by the Receiver and the SEC is submitted. The Receivership Professionals and SEC Staff are continuing to discuss and finalize this supplemental submission, which will address proposed case deadlines, budgeting issues, and professional fees, among other things. The SEC Staff and the Receivership Professionals expect that the supplemental submission will be filed by the end of this week.

Although the Order Appointing Receiver, dated December 19, 2016, which Your Honor amended on January 30, 2017 (the "Receiver Order") [Document Nos. 6, 59-2] states that fee applications be filed "within forty-five (45) days after the end of each calendar quarter," (Receiver Order ¶ 51), given the SEC's Staff's request that the First Interim Fee Applications be temporarily delayed, the Receivership Professionals request that they be allowed to postpone the submission of the First Interim Fee Applications until three business days after the supplemental submission discussed above is filed.

The SEC Staff consents to this request.

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Respectfully submitted,

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Counsel to the Receiver

cc: All counsel of record (via ECF)

Enclosures