

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE PLATINUM BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

PROTECTIVE ORDER

-----X
SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

No. 1:18-cv-06658-JSR

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.

-----X
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),

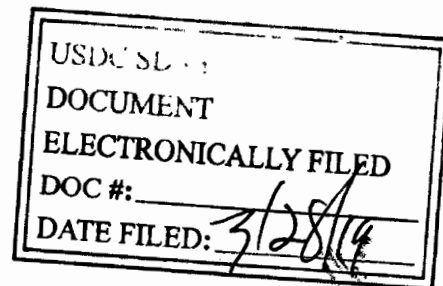
No. 1:18-cv-10936-JSR

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.



-----X
MELANIE L. CYGANOWSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITIES
MASTER FUND LP, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND LLC,
PLATINUM PARTNERS CREDIT OPPORTUNITIES
FUND INTERNATIONAL LTD., PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
INTERNATIONAL (A) LTD., and PLATINUM

No. 1:18-cv-12018-JSR

PARTNERS CREDIT OPPORTUNITIES FUND (BL)	:
LLC,	:
	:
Plaintiff,	:
	:
v.	:
	:
BEECHWOOD RE LTD., et al.,	:
	:
Defendants.	:
	:
-----	x

JED S. RAKOFF, U.S.D.J.

The parties having agreed to the following terms of confidentiality, and the Court having found that good cause exists for issuance of an appropriately-tailored confidentiality order governing the pre-trial phase of the above-captioned actions captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR (the “SHIP Action”), *Trott v. Platinum Management (NY), LLC*, No. 1:18-cv-10936-JSR, and *Cyganowski, as Equity Receiver v. Beechwood Re Ltd.*, No. 1:18-cv-12018-JSR (collectively, the “Actions”), it is therefore hereby

ORDERED that any person subject to this Order -- including without limitation the parties to the Actions, their representatives, agents, experts and consultants, all third parties providing discovery in the Actions, and all other interested persons with actual or constructive notice of this Order -- shall adhere to the following terms, upon pain of contempt:

1. Any person subject to this Order who receives from any other person any “Discovery Material” (*i.e.*, information of any kind provided in the course of discovery in the Actions) that is designated as “Confidential” pursuant to the terms of this Order shall not disclose such Confidential Discovery Material to anyone else except as expressly permitted hereunder.

2. The person producing any given Discovery Material may designate as Confidential only such portion of such material as consists of:

(a) previously nondisclosed financial information (including without limitation profitability reports or estimates, percentage fees, design fees, royalty rates, minimum guarantee payments, sales reports and sale margins);

(b) previously nondisclosed material relating to ownership or control of any non-public company;

(c) previously nondisclosed business plans, product development information, marketing plans;

(d) any information of a personal or intimate nature regarding any individual; or

(e) material disclosed in an arbitration that is required to be treated as confidential under the rules, orders or agreements governing that arbitration, including, without limitation, "Arbitration Information," as that term is defined in the Confidentiality Agreement and Protective Order in the arbitration entitled *Bankers Conseco Life Insurance Company et ano. v. Beechwood Re Ltd, et al.*, AAA Case No. 01-16-0004-2510;

(f) material filed under seal with any court; or

(g) any other category of information hereinafter given confidential status by the Court.

(h) For purposes of this paragraph "2," the phrase "previously nondisclosed" shall include, without limitation: (i) any disclosure of documents or information to a governmental agency or entity (but not including documents filed publicly), (ii) any disclosure pursuant to a discovery request or subpoena, (iii) material disclosed in an arbitration that is required to be treated as confidential under the rules, orders or agreements governing that arbitration, (iv) any disclosure under seal, and (v) any disclosure pursuant to a confidentiality agreement,

confidentiality order or nondisclosure agreement.

3. With respect to the Confidential portion of any Discovery Material other than deposition transcripts and exhibits, the producing person or that person's counsel may designate such portion as "Confidential" by stamping or otherwise clearly marking as "Confidential" the protected portion in a manner that will not interfere with legibility or audibility, and by also producing for future public use another copy of said Discovery Material with the confidential information redacted. With respect to deposition transcripts and exhibits, a producing person or that person's counsel may indicate on the record that a question calls for Confidential information, in which case the transcript of the designated testimony shall be bound in a separate volume and marked "Confidential Information Governed by Protective Order" by the reporter.

4. If at any time prior to the trial of the Actions, a producing person realizes that some portion[s] of Discovery Material that that person previously produced without limitation should be designated as Confidential, he may so designate by so apprising all parties in writing, and such designated portion[s] of the Discovery Material will thereafter be treated as Confidential under the terms of this Order.

5. No person subject to this Order other than the producing person shall disclose any of the Discovery Material designated by the producing person as Confidential to any other person whomsoever, except to:

- (a) the parties to the Actions;
- (b) counsel retained specifically for the Actions, including any paralegal, clerical and other assistant employed by such counsel and assigned to this matter;
- (c) as to any document, its author, its addressee, and any other person indicated on the face of the document as having received a copy;

(d) any witness who counsel for a party in good faith believes may be called to testify at trial or deposition in the Actions, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;

(e) any person retained by a party to serve as an expert witness or otherwise provide specialized advice to counsel in connection with the Actions, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;

(f) stenographers engaged to transcribe depositions conducted in the Actions; and

(g) the Court and its support personnel.

6. Prior to any disclosure of any Confidential Discovery Material to any person referred to in subparagraphs 5(d) or 5(e) above, such person shall be provided by counsel with a copy of this Order and shall sign a Non-Disclosure Agreement in the form annexed as an Exhibit hereto stating that that person has read this Order and agrees to be bound by its terms. Said counsel shall retain each signed Non-Disclosure Agreement, hold it in escrow, and produce it to opposing counsel either prior to such person being permitted to testify (at deposition or trial) or at the conclusion of the case, whichever comes first.

7. All Confidential Discovery Material filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose such Confidential Discovery Material, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. The parties will use their best efforts to minimize such sealing. In any event, any party filing a motion or any other papers with the Court under seal shall also publicly file a redacted copy of the same, via the Court's Electronic Case Filing system, that redacts only the Confidential Discovery Material itself, and not text that in no material way reveals the Confidential Discovery Material.

8. Any party who either objects to any designation of confidentiality, or who, by contrast, requests still further limits on disclosure (such as “attorneys’ eyes only” in extraordinary circumstances), may at any time prior to the trial of the Actions serve upon counsel for the designating person a written notice stating with particularity the grounds of the objection or request. If agreement cannot be reached promptly, counsel for all affected persons will convene a joint telephone call with the Court to obtain a ruling.

9. All persons are hereby placed on notice that the Court is unlikely to seal or otherwise afford confidential treatment to any Discovery Material introduced in evidence at trial, even if such material has previously been sealed or designated as Confidential. The Court also retains unfettered discretion whether or not to afford confidential treatment to any Confidential Document or information contained in any Confidential Document submitted to the Court in connection with any motion, application, or proceeding that may result in an order and/or decision by the Court.

10. Each person who has access to Discovery Material that has been designated as Confidential shall take all due precautions to prevent the unauthorized or inadvertent disclosure of such material.

11. If, in connection with the Actions, a party inadvertently discloses information subject to a claim of attorney-client privilege or attorney work product protection (“Inadvertently Disclosed Information”), such disclosure shall not constitute or be deemed a waiver or forfeiture of any claim of privilege or work product protection with respect to the Inadvertently Disclosed Information and its subject matter.

12. If a disclosing party makes a claim of inadvertent disclosure, the receiving party shall, within five business days, return or destroy all copies of the Inadvertently Disclosed Information, and provide a certification of counsel that all such information has been returned or

destroyed. Nothing in paragraphs 11 or 12, or any other provision, of this Order is intended to, or shall limit, the scope or effect of any Order entered pursuant to Rule 502(d) of the Federal Rules of Evidence in the Actions.

13. Within five business days of the notification that such Inadvertently Disclosed Information has been returned or destroyed, the disclosing party shall produce a privilege log with respect to the Inadvertently Disclosed Information.

14. The receiving party may move the Court for an Order compelling production of the Inadvertently Disclosed Information. The motion shall be filed under seal, and shall not assert as a ground for entering such an Order the fact or circumstances of the inadvertent production.

15. The disclosing party retains the burden of establishing the privileged or protected nature of any Inadvertently Disclosed Information. Nothing in this Order shall limit the right of any party to request an *in camera* review of the Inadvertently Disclosed Information.

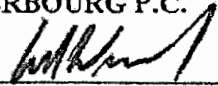
16. This Order shall survive the termination of the litigation. Within 30 days of the final disposition of the Actions, all Discovery Material designated as "Confidential," and all copies thereof, shall upon request be promptly returned to the producing person, or, upon permission of the producing person, destroyed to the extent reasonably possible taking into account backup systems and retention protocols.

17. This Order supersedes the Protective Order entered in the SHIP Action. (Dkt. No. 67)

18. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

SO STIPULATED AND AGREED.

OTTERBOURG P.C.

By: 
Adam C. Silverstein
Erik B. Weinick
Andrew S. Halpern
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
E-mail: asilverstein@otterbourg.com
eweinick@otterbourg.com
ahalpern@otterbourg.com

Attorneys for Melanie L. Cyganowski, as Receiver for Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund International Ltd., Platinum Partners Credit Opportunities Fund International (A) Ltd., Platinum Partners Credit Opportunities Fund (BL) LLC

LIPSIUS BENHAIM LAW LLP

By: _____
Ira Lipsius
80-02 Kew Gardens Rd., Suite 1030
Kew Gardens, NY 11415
Telephone: (212) 981-8442
Email: ilipsius@lipsiuslaw.com

Attorneys for Beechwood Re Ltd., Beechwood Re Investments, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda International LTD., Beechwood Bermuda LTD., BAM Administrative Services LLC, Moshe M. Feuer, Feuer Family 2016ACQ Trust, Taylor-Lau Family 2016ACQ Trust, Scott A. Taylor, Dhruv Narain, Beechwood Capital Group LLC, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BBLN-PEDCO Corp., Illumin Capital Management LP, BHLN-PEDCO Corp.

OTTERBOURG P.C.

By: _____
Adam C. Silverstein
Erik B. Weinick
Andrew S. Halpern
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
E-mail: asilverstein@otterbourg.com
eweinick@otterbourg.com
ahalpern@otterbourg.com

Attorneys for Melanie L. Cyganowski, as Receiver for Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund International Ltd., Platinum Partners Credit Opportunities Fund International (A) Ltd., Platinum Partners Credit Opportunities Fund (BL) LLC

LIPSIUS BENHAIM LAW LLP

By: _____
Ira Lipsius
80-02 Kew Gardens Rd., Suite 1030
Kew Gardens, NY 11415
Telephone: (212) 981-8442
Email: ilipsius@lipsiuslaw.com

Attorneys for Beechwood Re Ltd., Beechwood Re Investments, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda International LTD., Beechwood Bermuda LTD., BAM Administrative Services LLC, Moshe M. Feuer, Feuer Family 2016ACQ Trust, Taylor-Lau Family 2016ACQ Trust, Scott A. Taylor, Dhruv Narain, Beechwood Capital Group LLC, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BBLN-PEDCO Corp., Illumin Capital Management LP, BHLN-PEDCO Corp.

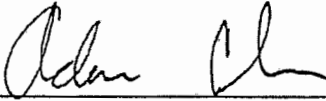
[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KATTEN MUCHIN ROSENMAN LLP

By: _____
Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

Attorneys for Olive Tree Capital LLC

WALDEN MACHT & HARAN LLP

By: 
Sean T. Haran
Adam P. Cohen
Jeffrey L. Ding
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2030
Email: acohen@wmhlaw.com
jding@wmhlaw.com
sharan@wmhlaw.com

Attorneys for Naftali Manela

DLA PIPER LLP (US)

By: _____
Aidan M. McCormack
R. Brian Seibert
Mark L. Dcckman
1251 Avenue of the Americas, 27th Floor
New York, New York 10020
Telephone: (212) 335-4500
E-mail: aidan.mccormack@dlapiper.com
brian.seibert@dlapiper.com
mark.deckman@dlapiper.com

*Attorneys for Plaintiffs and Defendants
Senior Health Insurance Company of
Pennsylvania and Fuzion Analytics, Inc.*

ALSTON & BIRD LLP

By: _____
John M. Aerni
Adam J. Kaiser
Daniella P. Main
Jenna Chelsea Polivy
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Email: adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com

*Attorneys for Defendants Bankers Conseco
Life Insurance Company, Washington National
Insurance Company, CNO Financial Group,
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KATTEN MUCHIN ROSENMAN LLP

By: _____
Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

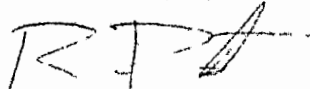
Attorneys for Olive Tree Capital LLC

WALDEN MACHT & HARAN LLP

By: _____
Adam P. Cohen
Jeffrey L. Ding
Sean T. Haran
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2000
Email: acohen@wmhlaw.com
jding@wmhlaw.com
sharan@wmhlaw.com

Attorneys for Naftali Manela

DLA PIPER LLP (US)

By:  _____
Aidan M. McCormack
Mark L. Deckman
R. Brian Seibert
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 335-4500
E-mail: aidan.mccormack@dlapiper.com
brian.seibert@dlapiper.com
mark.deckman@dlapiper.com

-and-

James D. Mathias (*pro hac vice*)
Kathleen A. Birrane (*pro hac vice*)
Ellen E. Dew (*pro hac vice*)
6225 Smith Avenue
Baltimore, Maryland 21209-3600
Telephone: (410) 580-3000
E-mail: james.mathias@dlapiper.com
kathleen.birrane@dlapiper.com
ellen.dew@dlapiper.com

Attorneys for Senior Health Insurance Company of Pennsylvania and Fuzion Analytics, Inc.

ALSTON & BIRD LLP

By: _____
John M. Aerni
Adam J. Kaiser
Daniella P. Main
Jenna Chelsea Polivy
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Email: adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com

Attorneys for Defendants Bankers Consecro Life Insurance Company, Washington National Insurance Company, CNO Financial Group, Inc. and 40/86 Advisors, Inc.

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KATTEN MUCHIN ROSENMAN LLP

By: _____
Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

Attorneys for Olive Tree Capital LLC

WALDEN MACHT & HARAN LLP

By: _____
Adam P. Cohen
Jeffrey L. Ding
Sean T. Haran
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2000
Email: acohen@wmhlaw.com
jding@wmhlaw.com
sharan@wmhlaw.com

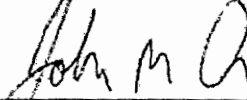
Attorneys for Naftali Manela

DLA PIPER LLP (US)

By: _____
Aidan M. McCormack
R. Brian Seibert
Mark L. Deckman
1251 Avenue of the Americas, 27th Floor
New York, New York 10020
Telephone: (212) 335-4500
E-mail: aidan.mccormack@dlapiper.com
brian.seibert@dlapiper.com
mark.deckman@dlapiper.com

*Attorneys for Plaintiffs and Defendants
Senior Health Insurance Company of
Pennsylvania and Fuzion Analytics, Inc.*

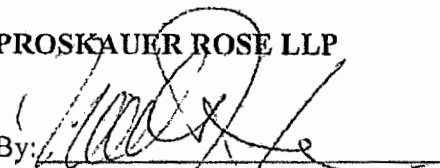
ALSTON & BIRD LLP

By:  _____
John M. Aerni
Adam J. Kaiser
Daniella P. Main
Jenna Chelsea Polivy
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Email: adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com

*Attorneys for Defendants Bankers Consecro
Life Insurance Company, Washington National
Insurance Company, CNO Financial Group,
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PROSKAUER ROSE LLP

By: 

Mark D. Harris
Steven H. Holinstat
Stacy P. Eilbaum
Edward J. Canter

11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Email: mharris@proskauer.com
sholinstat@proskauer.com
seilbaum@proskauer.com
ecanter@proskauer.com

*Attorneys for B Asset Manager, L.P.,
Beechwood Bermuda International Ltd.,
Beechwood Re Investments, LLC, Mark Feuer,
Scott Taylor, and Dhruv Narain in the SHIP
Action*

HOLLAND & KNIGHT LLP

By: _____

Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hkllaw.com
barbra.parlin@hkllaw.com
john.brownlee@hkllaw.com
timothy.belevetz@hkllaw.com
richard.bixter@hkllaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

MOSKOWITZ & BOOK, LLP

By: _____

Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

Attorneys for Platinum F.I. Group, LLC

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PROSKAUER ROSE LLP

By: _____

Edward J. Canter
Mark D. Harris
Stacy P. Eilbaum
Steven H. Holinstat

11 Times Square
New York, NY 10036
Telephone: (212) 969-3106
Email: ecanter@proskauer.com
mharris@proskauer.com
seilbaum@proskauer.com
sholinstat@proskauer.com

*Attorneys for B Asset Manager, Beechwood
Bermuda International Ltd., Beechwood Re
Investments, LLC, Moshe a/k/a Mark Feuer,
Scott Taylor*


MOSKOWITZ & BOOK, LLP

By: _____

Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

Attorneys for Platinum F.I. Group, LLC

HOLLAND & KNIGHT LLP

By:  _____

Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Timothy D. Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
barbra.parlin@hklaw.com
john.brownlee@hklaw.com
timothy.belevetz@hklaw.com
richard.bixter@hklaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PROSKAUER ROSE LLP

By: _____

Edward J. Canter
Mark D. Harris
Stacy P. Eilbaum
Steven H. Holinstat

11 Times Square
New York, NY 10036
Telephone: (212) 969-3106
Email: ecanter@proskauer.com
mharris@proskauer.com
seilbaum@proskauer.com
sholinstat@proskauer.com

*Attorneys for B Asset Manager, Beechwood
Bermuda International Ltd., Beechwood Re
Investments, LLC, Moshe a/k/a Mark Feuer,
Scott Taylor*

HOLLAND & KNIGHT LLP

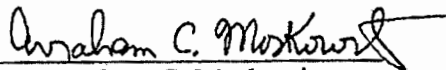
By: _____

Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hkllaw.com
barbra.parlin@hkllaw.com
john.brownlee@hkllaw.com
timothy.belevetz@hkllaw.com
richard.bixter@hkllaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

MOSKOWITZ & BOOK, LLP

By: 

Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

*Attorneys for Platinum F.I. Group, LLC
And Abraham Grossman*

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PROSKAUER ROSE LLP

HOLLAND & KNIGHT LLP

By: _____
Edward J. Canter
Mark D. Harris
Stacy P. Eilbaum
Steven H. Holinstat
11 Times Square
New York, NY 10036
Telephone: (212) 969-3106
Email: ecanter@proskauer.com
mharris@proskauer.com
seilbaum@proskauer.com
sholinstat@proskauer.com

By: _____
Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.
31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hkllaw.com
barbra.parlin@hkllaw.com
john.brownlee@hkllaw.com
timothy.belevetz@hkllaw.com
richard.bixter@hkllaw.com

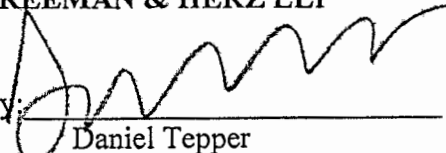
Attorneys for B Asset Manager, Beechwood Bermuda International Ltd., Beechwood Re Investments, LLC, Moshe a/k/a Mark Feuer, Scott Taylor

Attorneys for Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation), and for Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation)

MOSKOWITZ & BOOK, LLP

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____
Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com


By:  _____
Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Platinum F.I. Group, LLC

Attorneys for Leon Meyers

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**ROYER COOPER COHEN BRAUNFELD
LLC**

By: 

Marc E. Hirschfield
Marc F. Skapof
Royer Cooper Cohen Braunfeld LLC
1120 Avenue of the Americas
Fourth Floor
New York, NY 10036
Telephone: (212) 994-0451
Email: MHirschfield@rccbllaw.com
mskapof@rccbllaw.com

Barry L. Cohen
101 West Elm St., Suite 400
Conshohocken, PA 19428
Telephone: (484) 362-2628
Email: bcohen@rccbllaw.com

Attorneys for Twosons Corporation

LANKLER SIFFERT & WOHL LLP

By: _____
David Hodges
Matthew Coogan
500 Fifth Avenue, 34th Floor
New York, NY 10110
Telephone: (212) 921-8399
Email: dhodges@lswllaw.com
mcoogan@lswllaw.com

Attorneys for David Steinberg

DAVID LEVY

By: _____
David Levy
50 Riverside Boulevard
Apr 24C
New York, New York 10069

Pro Se

**CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP**

By: _____
Eliot Lauer
Gabriel Hertzberg
Jacques Semmelman
Julia Gumpfer
101 Park Avenue
New York, NY 10178
Telephone: (212) 696-8856
Email: ghertzberg@curtis.com
elauer@curtis.com
jsemmelman@curtis.com
jgumpfer@curtis.com

*Attorneys for David Bodner, Beechwood Trust
Nos. 7-14*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

ROYER COOPER COHEN BRAUNFELD
LLC

By: _____
Marc E. Hirschfield
Marc F. Skapof
Royer Cooper Cohen Braunfeld LLC
1120 Avenue of the Americas
Fourth Floor
New York, NY 10036
Telephone: (212) 994-0451
Email: MHirschfield@rcclaw.com
mkapof@rcclaw.com

Barry L. Cohen
101 West Elm St., Suite 400
Conshohocken, PA 19428
Telephone: (484) 362-2628
Email: bcohen@rcclaw.com

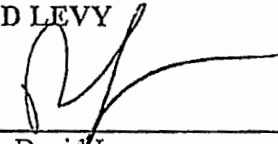
Attorneys for Twosons Corporation

LANGLER SIFFERT & WOHL LLP

By: _____
David Hodges
Matthew Coogan
500 Fifth Avenue, 34th Floor
New York, NY 10110
Telephone: (212) 921-8399
Email: dhodges@lswlaw.com
mcoogan@lswlaw.com

Attorneys for David Steinberg

DAVID LEVY

By: 
David Levy
50 Riverside Boulevard
Apr 24C
New York, New York 10069

Pro Se in the Trott Matter

CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP

By: _____
Eliot Lauer
Gabriel Hertzberg
Jacques Semmelman
Julia Gumpper
101 Park Avenue
New York, NY 10178
Telephone: (212) 696-8856
Email: ghertzberg@curtis.com
elauer@curtis.com
jsemmelman@curtis.com
jgumpper@curtis.com

*Attorneys for David Bodner, Beechwood Trust
Nos. 7-14*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

ROYAL COOPER COHEN BRAUNFELD DAVID LEVY
LLC

By: _____
Barry L. Cohen
101 West Elm St., Suite 400
Conshohocken, PA 19428
Telephone: (484) 362-2628
Email: bcohen@rccblaw.com

Marc E. Hirschfield
Marc F. Skapof
Royer Cooper Cohen Braunfeld LLC
1120 Avenue of the Americas
Fourth Floor
New York, NY 10036
Telephone: (212) 994-0451
Email: MHirschfield@rccblaw.com
mskapof@rccblaw.com

Attorneys for Twosons Corporation

LANGLER SIFFERT & WOHL LLP

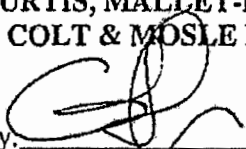
By: _____
David Hodges
Matthew Coogan
500 Fifth Avenue, 34th Floor
New York, NY 10110
Telephone: (212) 921-8399
Email: dhodges@lswlaw.com
mcoogan@lswlaw.com

Attorneys for David Steinberg

By: _____
David Levy
50 Riverside Boulevard
Apr 24C
New York, New York 10069

Pro Se


CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP

By:  _____
Eliot Lauer
Jacques Semmelman
Gabriel Hertzberg
101 Park Avenue
New York, NY 10178
Telephone: (212) 696-8856
Email: elauer@curtis.com
jsemmelman@curtis.com
ghertzberg@curtis.com

*Attorneys for David Bodner, Beechwood Trust
Nos. 7-14*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: 
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

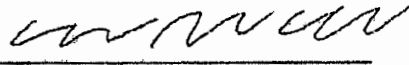
Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: 
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Oltensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jedpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

Attorneys for Estate of Jules Nordlicht, Barbara Nordlicht, FCBA Trust, Aaron Parnes, Sarah Parnes, Shmuel Fuchs Foundation, Solomon Werdiger, Morris Fuchs

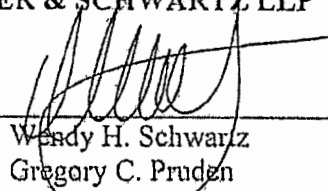
[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____

Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

Attorneys for Estate of Jules Nordlicht, Barbara Nordlicht, FCBA Trust, Aaron Parnes, Sarah Parnes, Shmuel Fuchs Foundation, Solomon Werdiger, Morris Fuchs

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: *jeffrey daniels*
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wswartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

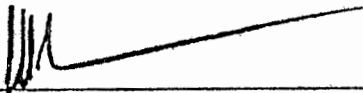
Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By:  _____
John D. Penn
Jeffrey D. Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

Attorneys for Estate of Jules Nordlicht, Barbara Nordlicht, FCBA Trust, Aaron Parnes, Sarah Parnes, Shmuel Fuchs Foundation, Solomon Werdiger, Morris Fuchs

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

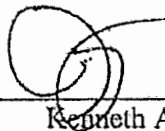
Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.


LAW OFFICES OF KENNETH A. ZITTER

By:  _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

Attorneys for Estate of Jules Nordlicht, Barbara Nordlicht, FCBA Trust, Aaron Parnes, Sarah Parnes, Shmuel Fuchs Foundation, Solomon Werdiger, Morris Fuchs

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: 
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com


Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

Attorneys for Mark Nordlicht and Platinum Management (NY) LLC

LAWRENCE R. GELBER

By: 
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

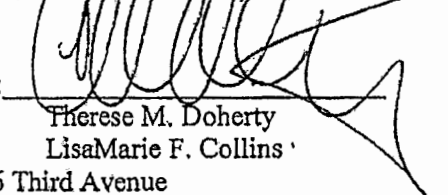
Attorneys for Michael Nordlicht, Kevin Cassidy

THOMPSON & KNIGHT LLP

By: _____
Stuart Glick
Nicole Williams
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3001
Email: Stuart.glick@tklaw.com
Nicole.williams@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.

By: 
Therese M. Doherty
LisaMarie F. Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

Attorneys for Michael Nordlicht, Kevin Cassidy and Meadows Capital LLC

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: _____
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

Attorneys for Mark Nordlicht and Platinum Management (NY) LLC

LAWRENCE R. GELBER

By: _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

Therese Doherty
Lisamarie Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

Attorneys for Michael Nordlicht, Kevin Cassidy

THOMPSON & KNIGHT LLP

By: _____
Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: _____
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

Attorneys for Mark Nordlicht and Platinum Management (NY) LLC

LAWRENCE R. GELBER

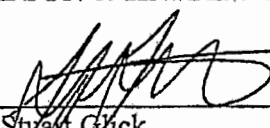
By: _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

Therese Doherty
Lisamarie Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

Attorneys for Michael Nordlicht, Kevin Cassidy


THOMPSON & KNIGHT LLP

By: _____

Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: 
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 542-8529 347-230-6622
Email: ~~tovia@jakubowitzchuang.com~~
tovia@jclawllp.com
*Attorneys for Rockwell Fulton Capital, L.P.,
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com
Attorneys for Estate of Uri Landesman

WILSON, SONSINI, GOODRICH &
ROSATI, PC

By: _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com
Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave NW
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com
Attorneys for Dhruv Narain

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 542-8529
Email: tovia@jakubowitzchuang.com

*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: Eric R. Breslin
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

Attorneys for Estate of Uri Landesman

WILSON, SONSINI, GOODRICH &
ROSATI, PC

By: _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave NW
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 542-8529
Email: tovia@jakubowitzchuang.com


*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
mngeller@duanemorris.com

Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

By:  _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy in the SHIP Action

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave NW
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____

Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 542-8529
Email: tovia@jakubowitzchuang.com

*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____

Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

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1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By:  _____
Chantale Fiebig

Naima L. Farrell
1050 Connecticut Avenue, N.W.
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain in the SHIP Action

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**KLESTADT WINTERS JURELLER,
SOUTHARD & STEVENS, LLP**

By: 

John E. Jureller, Jr.

200 West 41st Street, 17th Floor

New York, NY 10036

Telephone: (212) 972-3000

Email: jjureller@klestadt.com

*Attorneys for Defendant Beechwood Re (In
Official Liquidation) in the SHIP Action*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KLESTADT, WINTERS, JURELLER,
SOUTHARD & STEVENS LLP

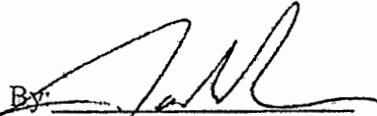
By: _____

John Evans Jureller
200 West 41st Street, 17th Floor
New York, NY 10018
Telephone: (212) 972-3000
Email: jjureller@klestadt.com

Attorneys for Defendant Beechwood Re Ltd.

PARKER IBRAHIM & BERG LLP

By: _____


James P. Berg
Daniel A. Schleifstein
Sanjay P. Ibrahim
5 Penn Plaza, Suite 2371
New York, New York 10001
Telephone: (212) 596-7037
Facsimile: (908) 333-6230
Email: james.berg@piblaw.com
daniel.schleifstein@piblaw.com
sanjay.ibrahim@piblaw.com

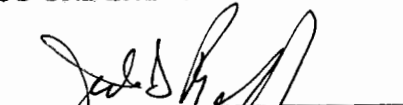
Please respond to Somerset office:

270 Davidson Avenue
Somerset, New Jersey 08873
Telephone: (908) 725-9700
Facsimile: (908) 333-6230

*Attorneys for Defendants BRE BCLIC
Primary, BRE BCLIC Sub, BRE WNIC 2013
LTC Primary and BRE WNIC 2013 LTC Sub*

Dated: New York, New York
March 26, 2019

SO ORDERED:



Jed S. Rakoff, U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE PLATINUM BEECHWOOD LITIGATION,

: No. 1:18-cv-06658-JSR

:
: **Non-Disclosure Agreement**

-----X
SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

: No. 1:18-cv-06658-JSR

:
: Plaintiff,

:
: -v-
:

BEECHWOOD RE LTD., et al.,

:
: Defendants.
:

-----X
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),

: No. 1:18-cv-10936-JSR

:
: Plaintiffs,

:
: -v-
:

PLATINUM MANAGEMENT (NY) LLC, et al.,

:
: Defendants.
:

-----X
MELANIE L. CYGANOWSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITIES
MASTER FUND LP, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND LLC,
PLATINUM PARTNERS CREDIT OPPORTUNITIES

: No. 1:18-cv-12018-JSR

FUND INTERNATIONAL LTD., PLATINUM	:
PARTNERS CREDIT OPPORTUNITIES FUND	:
INTERNATIONAL (A) LTD., and PLATINUM	:
PARTNERS CREDIT OPPORTUNITIES FUND (BL)	:
LLC,	:
	:
Plaintiff,	:
	:
v.	:
	:
BEECHWOOD RE LTD., et al.,	:
	:
Defendants.	:
	:
-----X	

I, _____, acknowledge that I have read and understand the Protective Order in the actions captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR, *Trott v. Platinum Management (NY), LLC*, No. 1:18-cv-10936-JSR, and *Cyganowski, as Equity Receiver v. Beechwood Re Ltd.*, No. 1:18-cv-12018-JSR (collectively, the “Actions”) governing the non-disclosure of those portions of Discovery Material that have been designated as Confidential. I agree that I will not disclose such Confidential Discovery Material to anyone other than for purposes of the Actions and that at the conclusion of the Actions I will return all discovery information to the party or attorney from whom I received it. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

Dated:

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