

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

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

This Filing Relates to:

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA

Plaintiff,

v.

BEECHWOOD RE LTD., et al.,

Defendants.

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

**DECLARATION OF JOHN ROBISON IN SUPPORT OF SENIOR HEALTH
INSURANCE COMPANY OF PENNSYLVANIA'S OPPOSITION TO BEECHWOOD
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, John Robison, make this declaration in support of Senior Health Insurance Company of Pennsylvania's Opposition to the Beechwood Defendants' Motion for Partial Summary Judgment and state as follows:

1. I am over the age of 18 and am competent to make this declaration.
2. I am the Chief Investment Officer for Senior Health Insurance Company of Pennsylvania ("SHIP") and am personally familiar with the above-captioned matter.
3. The assets that BAM, BBIL and BRE managed for SHIP pursuant to the three Investment Management Agreements ("IMAs") were maintained in accounts at Wilmington Trust Corporation (the "IMA Accounts").

4. On November 17, 2016, SHIP consolidated the three IMA Accounts into a single Wilmington Trust custodial account initially opened for the BAM IMA, titled "WT NA As Custodian Under Custody Agreement Dated 1/15/15 with Senior Health Insurance Company of Pennsylvania."

5. After SHIP's assets were consolidated into the BAM IMA Account, the IMA Accounts for the BBIL and BRE IMAs were closed.

6. As of January 23, 2019, when SHIP received the first demand for advancement and indemnification from counsel to the Beechwood Defendants, the majority of the assets held in the IMA Account are illiquid assets, many of which are in default or are interests that are encumbered by ongoing efforts to unwind the complicated investment structure set up by Beechwood and its affiliates.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed April 10, 2019 in Carmel, Indiana.


John Robison, Chief Investment Officer
Senior Health Insurance Company of
Pennsylvania