UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION	Master Docket No. 1:18-cv-06658-JSR
MELANIE L. CYGANOWSKI, AS EQUITY RECEIVER FOR PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND, et al., Plaintiff, v. BEECHWOOD RE LTD., et al., Defendants.	Case No. 1:18-cv-12018-JSR

NOTICE OF PARTIAL MOTION TO DISMISS THE PPCO RECEIVER'S FIRST AMENDED COMPLAINT BY DEFENDANTS SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA AND FUZION ANALYTICS, INC.

PLEASE TAKE NOTICE that upon accompanying the Memorandum of Law, Defendants Senior Health Insurance Company of Pennsylvania ("SHIP") and Fuzion Analytics, Inc. ("Fuzion"), by and through their undersigned counsel, will move this Court, before the Honorable Jed S. Rakoff, for an Order dismissing counts one through four, six, seven, and eighteen of the First Amended Complaint filed in the above-captioned action on March 29, 2019 [ECF No. 83], pursuant to Fed. R. Civ. P. 12(b)(1) for lack of subject matter jurisdiction or, in the alternative, pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted.

Pursuant to this Court's April 17, 2019 Order [ECF No. 116], Plaintiff's opposition to the motion, if any, is due by June 12, 2019; SHIP and Fuzion's reply in further support of the

motion, if any, is due by June 26, 2019; and oral argument on the motion shall be heard on July 1, 2019 at 10:00 a.m. in Courtroom 14B, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312.

Dated: New York, New York
May 14, 2019

DLA PIPER LLP (US)

By: /s/ *Aidan M. McCormack*
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