UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION,	Civil Action No. 1:18-cv-06658 (JSR)
WASHINGTON NATIONAL INSURANCE COMPANY and BANKERS CONSECO LIFE INSURANCE COMPANY, Cross-Claim and Third-Party Plaintiffs, v. PLATINUM MANAGEMENT (NY) LLC, et al., Cross-Claim and Third-Party Defendants.	Civil Action No. 1:18-cv-12018 (JSR)

NOTICE OF THIRD-PARTY AND CROSS-CLAIM PLAINTIFFS BANKERS CONSECO LIFE INSURANCE COMPANY AND WASHINGTON NATIONAL INSURANCE COMPANY'S MOTION TO ENFORCE STATE SECURITY STATUTES

Pursuant to New York Insurance Law § 1213 and Indiana Code § 27-4-4-4, defendants/cross-claim and third-party plaintiffs Washington National Insurance Company and Bankers Conseco Life Insurance Company (collectively, "Movants") request (i) that cross-claim defendant Beechwood Re Ltd's May 16 and May 17, 2019 filings on its motions to dismiss and motion to compel arbitration be stricken; (ii) that Movants be awarded security under New York Insurance Law § 1213 and Indiana Code § 27-4-4-4 in the amount of $250 million; and (iii) for such other and further relief as the Court deems just. Beechwood Re Ltd's opposition to this Motion is due no later than June 26, 2019, and Movants' reply, if any, is due no later than July 3, 2019. The Court will hear oral argument on July 11, 2019 at 9:00 a.m.

Dated: New York, New York
June 11, 2019

ALSTON & BIRD LLP

By: /s/ *Adam J. Kaiser*

Adam J. Kaiser
John M. Aerni
Daniella P. Main
Jenna C. Polivy
adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com
jenna.polivy@alston.com
ALSTON & BIRD LLP
90 Park Avenue
New York, New York 10016
(212) 210-9400
(212) 210-9444 (fax)