

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

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),

Case No. 18 Civ. 10936 (JSR)

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC,
et al.,

Defendants.

**STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANT
DANIEL SAKS' TIME TO ANSWER THE SECOND AMENDED COMPLAINT**

WHEREAS, 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 Platinum Partners Value Arbitrage Fund, L.P. (in Official Liquidation) filed their Second Amended Complaint (“SAC”) in the above-captioned litigation on April 11, 2019 (Dkt. No. 226);

WHEREAS, Defendant Daniel Saks (“Saks”) moved to dismiss the SAC (Dkt. No. 357);

WHEREAS, the Court granted in part and denied in part Saks’ Motion to Dismiss on

June 21, 2019;

WHEREAS, Saks' last day to answer the SAC is currently July 5, 2019;

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties through their undersigned attorneys, that Saks' time to answer the SAC shall be extended to July 12, 2019. No provision of this Stipulation shall be construed as a waiver of any party's claims or defenses and each party expressly reserves all rights as to the same. This is the first request for extension of Saks' time to answer the SAC.

Dated: June 28, 2019
New York, NY


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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)*

SO ORDERED.

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