

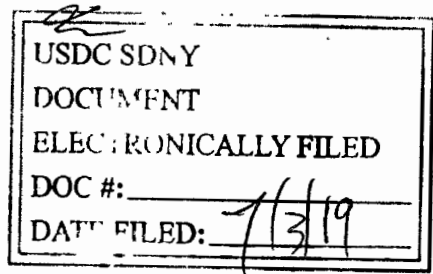
UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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 :  
 IN RE PLATINUM-BEECHWOOD LITIGATION :  
 :  
 : 18-cv-06658 (JSR)  
 ----- 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), :  
 :  
 Plaintiffs, :  
 :  
 -v- :  
 :  
 PLATINUM MANAGEMENT (NY) LLC, et al., :  
 :  
 Defendants. :  
 ----- X

18-cv-06658 (JSR)

18-cv-10936 (JSR)

**STIPULATION AND  
 [PROPOSED] ORDER**



**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys for the parties, that: (i) the time within which Defendant Seth Gerszberg (“Defendant”) may file a Motion for Reconsideration of the Court’s Opinion and Order dated June 21, 2019 (ECF Doc. No. 408) is hereby extended up to and including July 12, 2019; and (ii) in the event Defendant’s Motion for Reconsideration is denied, the time within which Defendant may answer the Second Amended Complaint (ECF Doc. No. 285) is extended for 15 days from the date of such denial.

There has been no previous request for an extension of Defendant’s time to answer the Second Amended Complaint.

No provision of this Stipulation and Order shall be construed as a waiver of any party’s claims or defenses and each party expressly reserves any and all of the same.

Dated: New York, New York  
July 1, 2019

EPSTEIN OSTROVE, LLC  
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Edison, New Jersey 08817

and

43 West 43rd Street, Suite 139  
NEW YORK, NY 10036

By: s/ Elliot D. Ostrove  
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*Attorneys for the Plaintiffs*

SO ORDERED:

Ed S. Rakoff  
HON. ED S. RAKOFF  
United States District Judge

7-2-19