

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE	:
COMMISSION,	:
	:
Plaintiff,	:
	:
-v-	:
	:
PLATINUM MANAGEMENT (NY) LLC;	:
PLATINUM CREDIT MANAGEMENT, L.P.;	:
MARK NORDLICHT;	:
DAVID LEVY;	:
DANIEL SMALL;	:
URI LANDESMAN;	:
JOSEPH MANN;	:
JOSEPH SANFILIPPO; and	:
JEFFREY SHULSE,	:
	:
Defendants.	:
----- X	

No. 16-cv-6848 (DLI)(VMS)

**SUPPLEMENTAL  
 DECLARATION OF ABIGAIL B.  
 SEIDNER IN SUPPORT OF  
 CONSENTED-TO MOTION TO  
 LIFT THE LITIGATION STAY IN  
 PLATINUM PARTNERS VALUE  
 ARBITRAGE FUND, LP, AND  
 PLATINUM PARTNERS LIQUID  
 OPPORTUNITY MASTER FUND  
 LP V. CHICAGO BOARD OPTIONS  
 EXCHANGE AND OPTIONS  
 CLEARING CORPORATION, CH.  
 DIV. CASE NO. 10CH54472 (ILL  
 CIR CT., COOK CTY.)**

I, Abigail Belknap Seidner, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an associate at Cooley LLP, proposed counsel to Bart M. Schwartz, the court-appointed Receiver in this case. I am over 18 years old and a member of the bar of this Court. This declaration is based upon personal knowledge. The Receiver will soon be making an application to retain Cooley to assist it in this matter.

2. I have been advised by Jeffrey A. Brown of Dechert LLP that Platinum Management (NY) LLC, Platinum Credit Management, L.P., and Mark Nordlicht consent to the Receiver’s Motion for an Order Lifting the Litigation Stay in *Platinum Partners Value Arbitrage Fund, LP and Platinum Partners Liquid Opportunity Master Fund LP v. Chicago Board Options Exchange and Options Clearing Corporation*, Ch. Div. Case No. 10CH54472 (Ill. Cir. Ct., Cook Cty.) filed January 12, 2017 (Docket No. 26).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 13, 2017  
New York, New York

s/Abigail Belknap Seidner  
Abigail Belknap Seidner  
Proposed Counsel to Bart M. Schwartz, Receiver  
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