



June 28, 2017

Via ECF

Honorable Dora L. Irizarry
Chief Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: SEC v. Platinum Management (NY) LLC, et al.
Case No. 16-cv-06848-DLI-VMS

Dear Chief Judge Irizarry:

This firm represents Allen Kaplan, the William J. Perlstein Revocable Trust and the Teresa L. Perlstein Revocable Trust (together, the "Independent Investors") who are independent (non-insider) investors in the Platinum Partners Credit Opportunities Fund. It is anticipated that we will be representing many other similarly situated investors as well.

We submit this letter in response to the *Letter for Approval of Resignation of Receiver* by Bart M. Schwartz (Dkt. No. 170) (the "Letter") and the *Application for an Order to Show Cause for Entry of a Second Amended Order Appointing Receiver and Appointment of a Substitute Receiver* and supporting documents by the United States Securities and Exchange Commission (Dkt. Nos. 173-176) (the "Application").

We respectfully request the opportunity to file a written response to the Letter and Application and be heard at the Show Cause hearing scheduled for July 7. The Independent Investors will abide by the Court Order (Dkt. No. 178) and file their response by June 30, 2017 at 3:00 p.m.

As investors who are unaffiliated with the Platinum insiders, we believe these parties constitute an important constituency whose voice should be heard in this process.

I am filing simultaneously a Motion to Admit *Pro Hac Vice*.

Respectfully submitted,

A handwritten signature in black ink that reads "William C. Nystrom". The signature is written in a cursive, flowing style.

William C. Nystrom

