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Via ECF

June 30, 2017

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

Re: *SEC v. Platinum Management (NY) LLC et al.*, Civil Case No. 16-cv-6848 (DLI)(VMS)

Dear Chief Judge Irizarry:

We are counsel to Bart M. Schwartz (the "Receiver"), the court-appointed receiver for defendant Platinum Credit Management, L.P. and certain related entities (collectively, the "Receivership Entities"), and write on his behalf to request your approval to retain and pay Deloitte Tax LLP ("Deloitte"). The Receiver wishes to retain Deloitte to prepare federal, state, and local tax returns and consult on tax issues for Platinum Partners Credit Opportunities Master Fund LP ("PPCO") and Platinum Partners Liquid Opportunity Master Fund LP ("PPLO" and collectively with PPCO the "Funds") and their affiliated entities. The work performed by Deloitte will ensure that the Receivership Entities are in compliance with their tax obligations.

Although the Receiver has filed an application to resign [Docket No. 170], the Receiver is making this application at this time as tax professionals must begin work soon for the Funds and investors to meet their extended 2016 filing deadlines of September 15, 2017.

The Receiver is aware of Your Honor's June 27, 2017 scheduling order setting a Show Cause Hearing for July 7, 2017, and Your Honor's note that "the parties should be prepared to address whether decision on any pending motions made by the Receiver for various authorizations should be stayed pending the Court's decision on the motion to appoint a new receiver." Order regarding Docket Nos. 177, 178. Prior to making this application, a member of the Receiver's staff conferred with a member of the SEC's staff, who advised that the SEC did not object to the filing of this application at this time but might not take a position of the merits of this application before the July 7, 2017 hearing in this case.

In support of this Application, the Receiver attaches the following Exhibits:

Exhibit 1 Declaration of Michael D. Klett, executed June 30, 2017 (the "Klett Declaration");

Exhibit 2 a proposed Order.



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Respectfully submitted,

/s/ Celia Goldwag Barenholtz
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cc: All counsel of record (via ECF)

Enclosures