

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

BEECHWOOD RE LTD. et al.,

Defendants.

No. 1:18-cv-06658-JSR

B ASSET MANAGER, L.P. et al.,

Plaintiffs,

-v-

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Defendant.

No. 1:19-cv-04487-JSR

MOTION TO WITHDRAW APPEARANCE

PLEASE TAKE NOTICE that, upon the annexed Declaration of Stacey P. Eilbaum and pursuant to Local Civil Rule 1.4, the undersigned respectfully moves to withdraw her appearance as counsel for B Asset Manager, LP, B Asset Manager II, LP, BAM Administrative Services LLC, Beechwood Bermuda International, Ltd., Beechwood Re Holdings, Inc., Beechwood Re Investments, LLC, Illumin Capital Management, LP, Moshe M. Feuer, Scott A. Taylor, and Dhruv Narain in the above-captioned actions.

Dated: January 24, 2023
New York, New York

Respectfully submitted,

/s/ Stacey P. Eilbaum

Stacey P. Eilbaum
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

*Counsel for B Asset Manager, LP, B Asset
Manager II, LP, BAM Administrative
Services LLC, Beechwood Bermuda
International, Ltd., Beechwood Re
Holdings, Inc., Beechwood Re
Investments, LLC, Illumin Capital
Management, LP, Moshe M. Feuer, Scott
A. Taylor, and Dhruv Narain*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

No. 1:18-cv-06658-JSR

BEECHWOOD RE LTD. et al.,

Defendants.

B ASSET MANAGER, L.P. et al.,

Plaintiffs,

-v-

No. 1:19-cv-04487-JSR

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Defendant.

DECLARATION OF STACEY P. EILBAUM PURSUANT TO LOCAL RULE 1.4

I, Stacey P. Eilbaum, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I am an associate at Proskauer Rose LLP, counsel for (i) B Asset Manager, LP (“BAM”), Beechwood Bermuda International, Ltd. (“BBIL”), Beechwood Re Investments, LLC (“BRILLC”), Illumin Capital Management, LP, Moshe M. Feuer, Scott A. Taylor, and Dhruv Narain (the “Beechwood Party Defendants”) in the portion of the consolidated action captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd. et al.*, No. 1:18-cv-

06658-JSR (S.D.N.Y.); and (ii) BAM, BBIL, BRILLC, B Asset Manager II, LP, BAM Administrative Services LLC, Beechwood Re Holdings, Inc., Feuer, Taylor, and Narain (the “Beechwood Party Plaintiffs”) in the portion of the consolidated action captioned *B Asset Manager, L.P. et al. v. Senior Health Insurance Company of Pennsylvania*, No. 1:19-cv-04487-JSR (S.D.N.Y.).

2. I respectfully submit this declaration in support of my Motion to Withdraw Appearance, which I am making because today is my last day at Proskauer Rose LLP.

3. My departure will not affect any pending deadlines nor occasion any delays in this consolidated action, as (1) other attorneys from Proskauer Rose LLP have also appeared, (2) all claims by and against the Beechwood Party Defendants in the portion of the consolidated action captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd. et al.*, No. 1:18-cv-06658-JSR (S.D.N.Y.) were dismissed by Stipulation and Order of Voluntary Dismissal dated July 20, 2020 and so ordered by the Court on July 28, 2020 (ECF No. 893), and (3) all claims by the Beechwood Party Plaintiffs in the portion of the consolidated action captioned *B Asset Manager, L.P. et al. v. Senior Health Insurance Company of Pennsylvania*, No. 1:19-cv-04487-JSR (S.D.N.Y.) were dismissed by Stipulation and Order of Voluntary Dismissal dated July 20, 2020 and so ordered by the Court on July 28, 2020 (ECF No. 76).

4. I am not asserting a retaining or charging lien.

Dated: January 24, 2023
New York, New York

Respectfully submitted,

/s/ Stacey P. Eilbaum

Stacey P. Eilbaum
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036

Tel: (212) 969-3000
Fax: (212) 969-2900

*Counsel for B Asset Manager, LP, B Asset
Manager II, LP, BAM Administrative
Services LLC, Beechwood Bermuda
International, Ltd., Beechwood Re
Holdings, Inc., Beechwood Re
Investments, LLC, Illumin Capital
Management, LP, Moshe M. Feuer, Scott
A. Taylor, and Dhruv Narain*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

BEECHWOOD RE LTD. et al.,

Defendants.

No. 1:18-cv-06658-JSR

B ASSET MANAGER, L.P. et al.,

Plaintiffs,

-v-

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Defendant.

No. 1:19-cv-04487-JSR

[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW APPEARANCE

Upon consideration of the Motion to Withdraw Appearance of Stacey P. Eilbaum as counsel for B Asset Manager, LP, B Asset Manager II, LP, BAM Administrative Services LLC, Beechwood Bermuda International, Ltd., Beechwood Re Holdings, Inc., Beechwood Re Investments, LLC, Illumin Capital Management, LP, Moshe M. Feuer, Scott A. Taylor, and Dhruv Narain (together, “Beechwood”) in the above-captioned actions (ECF No. __) (the “Motion”), it is hereby **ORDERED** that the Motion is **GRANTED**. The Clerk of the Court is

directed to relieve Ms. Eilbaum as counsel for Beechwood, remove her appearances from the dockets in the consolidated actions, and remove her name from the ECF distribution lists.

SO ORDERED.

Dated: This ___ day of _____, 2023

Jed S. Rakoff
United States District Judge