

John D. Penn, Esq.  
Jeffrey D. Vanacore, Esq.  
PERKINS COIE LLP  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112-0085  
Telephone: 212.262.6900  
Facsimile: 212.977.1642  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

Plaintiff,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

Civ. Action No. 18-cv-6658 (JSR)

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.

Civ. Action No. 18-cv-10936 (JSR)

**DEFENDANT GRD ESTATES LTD.'S NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant GRD Estates Ltd. (“GRD”), by and through its undersigned attorneys, hereby moves this Court in the above-captioned action before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007, for an order dismissing the Complaint of Plaintiffs Martin Trott and Christopher Smith, as the 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) pursuant to Fed. R. Civ. P. 12(b)(5) for insufficient service of process and Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted (the “Motion”). In accordance with Rule 2(d) of the Individual Rules of Practice before this Court and this Court’s Order in these proceedings dated January 24, 2019 [Doc. No. 158], GRD respectfully sets forth the following:

1. Plaintiffs’ response to the Motion shall be filed on or before **February 11, 2019**;
2. Reply memorandum of GRD shall be filed on or before **February 15, 2019**; and
3. Argument on this motion will be heard on **February 25, 2019 at 3:00 p.m. (ET)**.

Dated: February 4, 2019  
New York, New York

Respectfully submitted,

/s/ John D. Penn

John D. Penn, Esq.

Jeffrey D. Vanacore, Esq.

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Facsimile: (212) 977-1642

[jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)

[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for Defendant GRD Estates Ltd.*