UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
In re: PLATINUM-BEECHWOOD LITIGATION	x : No. 18 Civ. 6658 (JSR)
	1) 5 4)
MARTIN TROTT and CHRISTOPHER SMITH, as Joint Official Liquidators and Foreign Representatives of PLATINUM PARTNERS VALUE	X
ARBITRAGE FUND L.P. (in OFFICIAL LIQUIDATION) and PLATINUM PARTNERS VALUE ARBITRAGE FUND L.P. (in OFFICIAL LIQUIDATION),	: No. 18 Civ. 10936 (JSR) : :
Plaintiffs, v.	: NOTICE OF MOTION AND : MOTION TO DISMISS FIRST : AMENDED COMPLAINT AS TO : TWOSONS CORPORATION
PLATINUM MANAGEMENT (NY) LLC, et al., Defendants.	: ORAL ARGUMENT REQUESTED
	X

PLEASE TAKE NOTICE that, on February 25, 2019, at 3:00 p.m., Defendant, Twosons Corporation ("Twosons"), will respectfully move (the "Motion") this Court for entry of an order (the "Order") pursuant to Federal Rule of Civil Procedure 12 dismissing each of the causes of action alleged against Twosons in the First Amended Complaint ("FAC") docketed January 23, 2019 (ECF No. 156). Twosons' Motion is supported by this Notice of Motion, the accompanying Memorandum of Law (the "Twosons Memo"), all exhibits thereto, and all pleadings and evidence otherwise properly before this Court, including the motions filed substantially contemporaneously herewith of the other defendants on the same or similar grounds. Twosons respectfully reserves all

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rights to further move to dismiss all causes of action against it on any grounds not presently known.¹

Respectfully Submitted, /s/ Marc Hirschfield

Dated: February 4, 2019

Marc Hirschfield Marc Skapof Barry L. Cohen

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Attorneys for Defendant, Twosons Corporation

¹ Twosons is hereby renewing its Motion (ECF No. 87) on group pleading grounds. In the event all causes of action against Twosons are not fully dismissed, Twosons reserves its rights to file a subsequent motion to dismiss on all other available grounds including, by way of example and not limitation, standing, lack of personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted. Additionally, by filing this Motion, Twosons is respectfully not consenting to the personal jurisdiction of this Court.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
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In re: PLATINUM-BEECHWOOD LITIGATION	: No. 18 Civ. 6658 (JSR) : : : : : : : : : : : : : : : : : : :
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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),	: No. 18 Civ. 10936 (JSR) : [PROPOSED] ORDER
Plaintiffs,	:
\mathbf{v}_{\star}	\$ 2
PLATINUM MANAGEMENT (NY) LLC, et al., Defendants.	* ! } !
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Upon consideration of Defendant, Twosons Corporat	
the First Amended Complaint (ECF No), Memorano	dum in Support thereof, all exhibits
thereto, and all pleadings and evidence otherwise prope	erly before the Court, it is hereby
ORDERED that Twosons' Motion is GRANTED , and that I	Plaintiffs' claims and causes of action
against Twosons in the First Amended Complaint are hereby	y DISMISSED in their entirety, with
prejudice, including but not limited to Counts Nine, Ten, and	l Fifteen.
SO ORDERED.	
Dated: This day of, 2019.	
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Jed S. Rakoff United States District Judge