

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	:	No. 18 Civ. 10936 (JSR)
PARTNERS VALUE ARBITRAGE FUND L.P. (in	:	
OFFICIAL LIQUIDATION),	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
PLATINUM MANAGEMENT (NY) LLC, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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**JOINT STIPULATION AND PROPOSED ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT**

WHEREAS, plaintiffs filed the initial Complaint in this action on November 21, 2018 (ECF No. 1) and a First Amended Complaint on January 23, 2019 (ECF No. 159);

WHEREAS, defendant Mark Nordlicht is a defendant in that action captioned *U.S. v. Nordlicht, et al.*, 16-cr-00640 (BMC), pending in the United States District Court for the Eastern District of New York (“*US v. Nordlicht*”);

WHEREAS, Nordlicht is the managing member of defendant Platinum Management (NY) LLC (“Platinum Management”);

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties to the above-captioned action, that the time within which Platinum Management may move, answer, or otherwise respond to the First Amended Complaint, or any

further amended complaints, is hereby extended up to and including 30 days from the closing date of the trial in *U.S. v. Nordlicht*.

The time within which Mr. Nordlicht may move, answer, or otherwise respond to the First Amended Complaint, or any further amended complaints, is hereby extended, if at all, as authorized by the Court.

No provision of this Stipulation and Order shall be construed as a waiver of any party's claims or defenses, which each party reserves.

There has been no previous request for an extension of time to respond to the Complaint.

Dated: New York, New York
February 28, 2019

REGOSIN, EDWARDS, STONE
& FEDER

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*Attorney for Defendants
Mark Nordlicht and
Platinum Management (NY) LLC*

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official Liquidators and
Foreign Representatives of Platinum Partners
Value Arbitrage Fund L.P. (in Official Liquidation),
and for Platinum Partners Value Arbitrage Fund
L.P. (in Official Liquidation)*

SO ORDERED:

JED S. RAKOFF
United States District Judge

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