

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE PLATINUM-BEECHWOOD LITIGATION

Case No.: 1:18-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), *et ano.*,

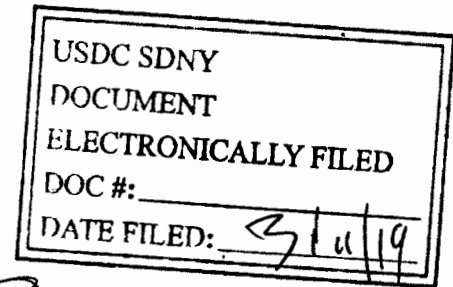
Case No.: 1:18-cv-10936-JSR

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC, *et al.*,

Defendants.



**STIPULATION AND PROPOSED ORDER  
EXTENDING TIME TO RESPOND TO COMPLAINT**

WHEREAS, on November 21, 2018 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 Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation) (collectively, "Plaintiffs") filed the initial Complaint (ECF No. 1) in Case No. 1:18-cv-10936-JSR (the "Trott Action"), naming Michael Katz ("Katz") as a defendant;

WHEREAS, on January 7, 2019, Katz waived service of the Summons and Complaint in the Trott Action;

WHEREAS, during the December 19, 2018 Initial Conference in the Trott Action, the Court set a briefing schedule for an initial round of motions to dismiss based on group pleading, and indicated that no defendant would be prejudiced from filing a motion to dismiss on other grounds at a later date to be set by the Court;

WHEREAS, on January 23, 2019, Plaintiffs filed a First Amended Complaint (ECF No.

159) in the Trott Action;

WHEREAS, the Court has not yet set a briefing schedule for motions to dismiss on grounds other than group pleading;

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 Katz may move, answer, or otherwise respond to the First Amended Complaint, or any further amended complaint in the Trott Action, is hereby extended up to and including the date to be set by the Court for the filing of motions to dismiss on grounds other than group pleading.

IT IS FURTHER STIPULATED AND AGREED that 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 for Katz to respond to the Complaint or First Amended Complaint.

Dated: March 8, 2019  
New York, New York

THOMPSON & KNIGHT LLP

By: /s/ Stuart J. Glick

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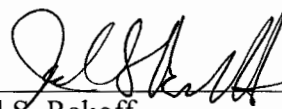
/s/ Richard A. Bixter, Jr.

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*Counsel for the Plaintiffs*

*Attorneys for Defendant Michael Katz*

SO ORDERED:

A handwritten signature in black ink, appearing to read "Jed S. Rakoff", written over a horizontal line.

Jed S. Rakoff  
United States District Judge

3-10-19