

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
IN RE PLATINUM-BEECHWOOD LITIGATION,	:	No. 18 Civ. 6658 (JSR)
	:	
-----	X	
	:	
MARTIN TROTT and CHRISTOPHER SMITH, as Joint	:	
Official Liquidators and Foreign Representatives of	:	
PLATINUM PARTNERS VALUE ARBITRAGE FUND	:	No. 18 Civ. 10936 (JSR)
L.P. (in OFFICIAL LIQUIDATION) and PLATINUM	:	
PARTNERS VALUE ARBITRAGE FUND L.P. (in	:	
OFFICIAL LIQUIDATION),	:	ANSWER OF DEFENDANTS
	:	MICHAEL NORDLICHT
	:	<u>AND KEVIN CASSIDY</u>
Plaintiffs,	:	
	:	
v.	:	
	:	JURY TRIAL DEMANDED
PLATINUM MANAGEMENT (NY) LLC, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
-----	X	

Defendants Michael Nordlicht and Kevin Cassidy, by and through their undersigned attorneys, as and for their Answer to the Second Amended Complaint filed in this action on March 29, 2019 (“SAC”), hereby state as follows:

1. Deny each and every allegation contained in paragraph 1 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

2. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 2 of the SAC.

3. Deny each and every allegation contained in paragraph 3 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

4. Deny each and every allegation contained in paragraph 4 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

5. Deny each and every allegation contained in paragraph 5 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

6. Deny each and every allegation contained in paragraph 6 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

7. Deny each and every allegation contained in paragraph 7 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

8. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 8 of the SAC.

9. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 9 of the SAC.

10. Deny each and every allegation contained in paragraph 10 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny or information sufficient to form a belief knowledge as to the truth or falsity of the remaining allegations.

11. Deny each and every allegation contained in paragraph 11 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

12. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 12 of the SAC, except admit that Mark Nordlicht, Uri Landesman, Murray Huberfeld, David Bodner, David Levy, Daniel Saks, and Ezra Beren were at various times affiliated with Platinum-related entities, David Steinberg and David Small were portfolio managers of Platinum-related entities, Joseph SanFilippo was the chief financial officer of Platinum-related entities, and David Ottensoser was the general counsel of Platinum-related entities.

13. Deny each and every allegation contained in paragraph 13 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations, and respectfully refer the Court to the document referred to therein for its full content.

14. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 14 of the SAC.

15. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 15 of the SAC.

16. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 16 of the SAC.

17. Deny each and every allegation contained in paragraph 17 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

18. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 18 of the SAC.

19. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 19 of the SAC.

20. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 20 of the SAC.

21. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 21 of the SAC.

22. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 22 of the SAC.

23. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 23 of the SAC.

24. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 24 of the SAC.

25. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 25 of the SAC.

26. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 26 of the SAC.

27. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 27 of the SAC.

28. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 28 of the SAC.

29. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 29 of the SAC.

30. Deny each and every allegation contained in paragraph 30 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

31. Deny each and every allegation contained in paragraph 31 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

32. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 32 of the SAC.

33. Deny each and every allegation contained in paragraph 33 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

34. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 34 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

35. Deny each and every allegation contained in paragraph 35 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which

consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

36. Neither admit nor deny the allegations contained in paragraph 36 which consist of definitions to which no responsive pleading is required.

37. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 37 of the SAC.

38. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 38 of the SAC.

39. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 39 of the SAC.

40. Neither admit nor deny the allegations contained in paragraph 40 which consist of definitions to which no responsive pleading is required, except admit the second sentence of paragraph 40 of the SAC.

41. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 41 of the SAC, except admit that Mark Nordlicht, Huberfeld and Bodner founded Platinum Management.

42. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 42 of the SAC.

43. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 43 of the SAC.

44. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 44 of the SAC.

45. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 45 of the SAC.

46. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 46 of the SAC.

47. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 47 of the SAC.

48. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 48 of the SAC.

49. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 49 of the SAC.

50. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 50 of the SAC.

51. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 51 of the SAC.

52. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 52 of the SAC.

53. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 53 of the SAC.

54. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 54 of the SAC.

55. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 55 of the SAC.

56. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 56 of the SAC.

57. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 57 of the SAC.

58. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 58 of the SAC.

59. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 59 of the SAC.

60. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 60 of the SAC.

61. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 61 of the SAC.

62. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 62 of the SAC.

63. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 63 of the SAC.

64. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 64 of the SAC.

65. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 65 of the SAC.

66. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 66 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

67. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 67 of the SAC.

68. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 68 of the SAC.

69. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 69 of the SAC.

70. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 70 of the SAC.

71. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 71 of the SAC, except respectfully refer the Court to the plea allocution referred to therein for its full contents.

72. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 72 of the SAC.

73. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 73 of the SAC.

74. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 74 of the SAC.

75. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 75 of the SAC.

76. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 76 of the SAC.

77. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 77 of the SAC.

78. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 78 of the SAC.

79. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 79 of the SAC.

80. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 80 of the SAC.

81. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 81 of the SAC.

82. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 82 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

83. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 83 of the SAC.

84. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 84 of the SAC.

85. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 85 of the SAC.

86. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 86 of the SAC.

87. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 87 of the SAC.

88. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 88 of the SAC.

89. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 89 of the SAC.

90. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 90 of the SAC.

91. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 91 of the SAC.

92. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 92 of the SAC.

93. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 93 of the SAC.

94. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 94 of the SAC.

95. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 95 of the SAC.

96. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 96 of the SAC.

97. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 97 of the SAC, except admit that Ottensoser served as general counsel of Platinum Management.

98. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 98 of the SAC.

99. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 99 of the SAC.

100. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 100 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

101. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 101 of the SAC.

102. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 102 of the SAC.

103. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 103 of the SAC.

104. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 104 of the SAC.

105. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 105 of the SAC.

106. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 106 of the SAC.

107. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 107 of the SAC.

108. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 108 of the SAC.

109. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 109 of the SAC.

110. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 110 of the SAC.

111. Deny each and every allegation in paragraph 111 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

112. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 112 of the SAC.

113. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 113 of the SAC.

114. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 114 of the SAC.

115. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 115 of the SAC.

116. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 116 of the SAC.

117. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 117 of the SAC.

118. Deny each and every allegation in paragraph 118 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

119. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 119 of the SAC.

120. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 120 of the SAC.

121. Deny each and every allegation contained in paragraph 121 of the SAC, except admit that Michael Nordlicht is the nephew of Mark Nordlicht, Michael Nordlicht was employed by Agera Energy LLC as a Vice President, Legal and Operations Manager, between June 2014 and January 2019, Agera Energy LLC is a retail energy supplier and a wholly-owned subsidiary of Agera Holdings LLC, and that, from July 2014 through April 20, 2018, Michael Nordlicht was a member of Agera Holdings LLC and held 95.01% of the outstanding equity interest.

122. Deny each and every allegation contained in paragraph 122 of the SAC.

123. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 123 of the SAC.

124. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 124 of the SAC.

125. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 125 of the SAC.

126. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 126 of the SAC.

127. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 127 of the SAC.

128. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 128 of the SAC.

129. Admit the allegations contained in paragraph 129 of the SAC.

130. Deny each and every allegation contained in paragraph 130 of the SAC, except admit that, by judgment in a criminal case entered on April 26, 2012, Cassidy pleaded guilty to a single count information (conspiracy to commit wire fraud) and was sentenced to be imprisoned

for a term of 30 months, respectfully refer the Court to the judgment for its full contents, and aver that allegations purporting to recite Kevin Cassidy's history are not relevant to the transactions or events at issue, are immaterial, impertinent, scandalous and unduly prejudicial, constitute an *ad hominem* attack upon Kevin Cassidy, and should be stricken from the SAC pursuant to Fed. R. Civ. P. 12(f).

131. Deny each and every allegation contained in paragraph 131 of the SAC, except admit that, between June 2014 and June 2016, Cassidy was employed by Agera Energy LLC as its Executive Managing Director, Marketing and Acquisitions.

132. Deny each and every allegation contained in paragraph 132 of the SAC, except admit that Kevin Cassidy is the President of Starfish Capital, Inc.

133. Deny each and every allegation contained in paragraph 133 of the SAC.

134. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 134 of the SAC.

135. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 135 of the SAC.

136. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 136 of the SAC.

137. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 137 of the SAC.

138. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 138 of the SAC.

139. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 139 of the SAC.

140. Deny the allegations contained in paragraph 140 of the SAC, except admit that Barbara and Jules Nordlicht are the parents of Mark Nordlicht and the grandparents of Michael Nordlicht.

141. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 141 of the SAC.

142. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 142 of the SAC.

143. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 143 of the SAC.

144. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 144 of the SAC.

145. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 145 of the SAC.

146. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 146 of the SAC.

147. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 147 of the SAC.

148. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 148 of the SAC.

149. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 149 of the SAC.

150. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 150 of the SAC.

151. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 151 of the SAC.

152. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 152 of the SAC.

153. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 153 of the SAC.

154. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 154 of the SAC.

155. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 155 of the SAC.

156. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 156 of the SAC.

157. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 157 of the SAC.

158. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 158 of the SAC.

159. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 159 of the SAC.

160. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 160 of the SAC.

161. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 161 of the SAC.

162. Deny knowledge or information sufficient to form a belief as to the truth or falsity

of the allegations contained in paragraph 162 of the SAC.

163. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 163 of the SAC.

164. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 164 of the SAC.

165. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 165 of the SAC.

166. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 166 of the SAC.

167. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 167 of the SAC.

168. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 168 of the SAC.

169. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 169 of the SAC.

170. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 170 of the SAC.

171. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 171 of the SAC.

172. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 172 of the SAC.

173. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 173 of the SAC.

174. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 174 of the SAC, and respectfully refer the Court to the document referenced to therein for its full contents.

175. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 175 of the SAC.

176. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 176 of the SAC.

177. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 177 of the SAC, and respectfully refer the Court to the document referenced to therein for its full contents.

178. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 178 of the SAC, and respectfully refer the Court to the document referenced to therein for its full contents.

179. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 179 of the SAC.

180. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 180 of the SAC.

181. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 181 of the SAC.

182. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 182 of the SAC.

183. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 183 of the SAC, except admit that Ora Gichtin is the

sister of Mark Nordlicht and that David Gichtin is the husband of Ora Gichtin.

184. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 184 of the SAC.

185. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 185 of the SAC.

186. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 186 of the SAC.

187. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 187 of the SAC.

188. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 188 of the SAC.

189. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 189 of the SAC.

190. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 190 of the SAC.

191. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 191 of the SAC.

192. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 192 of the SAC.

193. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 193 of the SAC.

194. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 194 of the SAC.

195. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 195 of the SAC.

196. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 196 of the SAC.

197. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 197 of the SAC.

198. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 198 of the SAC.

199. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 199 of the SAC.

200. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 200 of the SAC.

201. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 201 of the SAC.

202. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 202 of the SAC.

203. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 203 of the SAC.

204. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 204 of the SAC.

205. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 205 of the SAC.

206. Deny knowledge or information sufficient to form a belief as to the truth or falsity

of the allegations contained in paragraph 206 of the SAC.

207. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 207 of the SAC.

208. Deny each and every allegation contained in paragraph 208 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

209. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 209 of the SAC.

210. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 210 of the SAC.

211. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 211 of the SAC.

212. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 212 of the SAC.

213. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 213 of the SAC.

214. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 214 of the SAC.

215. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 215 of the SAC.

216. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 216 of the SAC.

217. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 217 of the SAC.

218. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 218 of the SAC.

219. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 219 of the SAC.

220. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 220 of the SAC.

221. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 221 of the SAC.

222. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 222 of the SAC.

223. Neither admit nor deny the allegations contained in paragraph 223 of the SAC which consist of legal conclusions to which no responsive pleading is required.

224. Neither admit nor deny the allegations contained in paragraph 224 of the SAC which consist of legal conclusions to which no responsive pleading is required.

225. Neither admit nor deny the allegations contained in paragraph 225 of the SAC which consist of legal conclusions to which no responsive pleading is required.

226. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 226 of the SAC.

227. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 227 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

228. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 228 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

229. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 229 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

230. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 230 of the SAC.

231. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 231 of the SAC.

232. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 232 of the SAC.

233. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 233 of the SAC.

234. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 234 of the SAC.

235. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 235 of the SAC.

236. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 236 of the SAC.

237. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 237 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

238. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 238 of the SAC.

239. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 239 of the SAC.

240. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 240 of the SAC.

241. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 241 of the SAC.

242. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 242 of the SAC, except admit that Platinum Management operated out of offices in New York, New York, including at 250 West 55th Street, 14th Floor, New York, New York 10019.

243. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 243 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

244. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 244 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

245. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 245 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

246. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 246 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

247. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 247 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

248. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 248 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

249. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 249 of the SAC.

250. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 250 of the SAC.

251. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 251 of the SAC.

252. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 252 of the SAC.

253. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 253 of the SAC.

254. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 254 of the SAC.

255. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 255 of the SAC.

256. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 256 of the SAC.

257. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 257 of the SAC.

258. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 258 of the SAC.

259. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 259 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

260. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 260 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

261. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 261 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

262. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 262 of the SAC.

263. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 263 of the SAC.

264. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 264 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

265. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 265 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

266. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 266 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

267. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 267 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

268. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 268 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

269. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 269 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

270. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 270 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

271. Deny each and every allegation contained in paragraph 271 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

272. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 272 of the SAC.

273. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 273 of the SAC.

274. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 274 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

275. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 275 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

276. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 276 of the SAC.

277. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 277 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

278. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 278 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

279. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 279 of the SAC.

280. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 280 of the SAC, except admit that, on or about June 8,

2016, federal criminal charges were filed against Huberfeld and respectfully refer the Court to the indictment for its full contents.

281. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 281 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

282. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 282 of the SAC.

283. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 283 of the SAC.

284. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 284 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

285. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 285 of the SAC.

286. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 286 of the SAC.

287. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 287 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

288. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 288 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

289. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 289 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

290. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 290 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

291. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 291 of the SAC.

292. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 292 of the SAC.

293. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 293 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

294. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 294 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

295. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 295 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

296. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 296 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

297. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 297 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

298. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 298 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

299. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 299 of the SAC, except admit that a criminal indictment was filed against Nordlicht, Levy, Landesman and Small on or about December 16, 2016, and respectfully refer the Court to the indictment for its full contents.

300. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 300 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

301. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 301 of the SAC.

302. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 302 of the SAC.

303. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 303 of the SAC.

304. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 304 of the SAC.

305. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 305 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

306. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 306 of the SAC.

307. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 307 of the SAC.

308. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 308 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

309. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 309 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

310. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 310 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

311. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 311 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

312. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 312 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

313. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 313 of the SAC.

314. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 314 of the SAC.

315. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 315 of the SAC.

316. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 316 of the SAC.

317. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 317 of the SAC.

318. Deny each and every allegation contained in paragraph 318 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

319. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 319 of the SAC.

320. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 320 of the SAC.

321. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 321 of the SAC.

322. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 322 of the SAC.

323. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 323 of the SAC.

324. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 324 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

325. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 325 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

326. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 326 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

327. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 327 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

328. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 328 of the SAC.

329. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 329 of the SAC.

330. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 330 of the SAC.

331. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 331 of the SAC.

332. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 322 of the SAC.

333. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 333 of the SAC.

334. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 334 of the SAC.

335. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 335 of the SAC.

336. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 336 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

337. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 337 of the SAC.

338. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 338 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

339. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 339 of the SAC.

340. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 340 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

341. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 341 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

342. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 342 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

343. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 343 of the SAC.

344. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 344 of the SAC.

345. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 345 of the SAC.

346. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 346 of the SAC.

347. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 347 of the SAC.

348. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 348 of the SAC.

349. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 349 of the SAC.

350. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 350 of the SAC.

351. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 351 of the SAC.

352. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 352 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

353. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 353 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

354. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 354 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

355. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 355 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

356. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 356 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

357. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 357 of the SAC.

358. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 358 of the SAC.

359. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 359 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

360. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 360 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

361. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 361 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

362. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 362 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

363. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 363 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

364. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 364 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

365. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 365 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

366. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 366 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

367. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 367 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

368. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 368 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

369. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 369 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

370. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 370 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

371. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 371 of the SAC.

372. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 372 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

373. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 373 of the SAC.

374. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 374 of the SAC.

375. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 375 of the SAC.

376. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 376 of the SAC.

377. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 377 of the SAC.

378. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 378 of the SAC.

379. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 379 of the SAC.

380. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 380 of the SAC.

381. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 381 of the SAC.

382. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 382 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

383. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 383 of the SAC.

384. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 384 of the SAC.

385. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 385 of the SAC.

386. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 386 of the SAC.

387. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 387 of the SAC.

388. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 388 of the SAC, except admit that Narain was a senior executive of BAM.

389. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 389 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

390. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 390 of the SAC.

391. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 391 of the SAC.

392. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 392 of the SAC.

393. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 393 of the SAC.

394. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 394 of the SAC.

395. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 395 of the SAC.

396. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 396 of the SAC.

397. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 397 of the SAC.

398. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 398 of the SAC.

399. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 399 of the SAC.

400. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 400 of the SAC.

401. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 401 of the SAC.

402. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 402 of the SAC.

403. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 403 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

404. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 404 of the SAC.

405. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 405 of the SAC.

406. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 406 of the SAC.

407. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 407 of the SAC.

408. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 408 of the SAC.

409. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 409 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

410. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 410 of the SAC.

411. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 411 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

412. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 412 of the SAC.

413. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 413 of the SAC.

414. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 414 of the SAC.

415. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 415 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

416. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 416 of the SAC.

417. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 417 of the SAC.

418. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 418 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

419. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 419 of the SAC.

420. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 420 of the SAC.

421. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 421 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

422. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 422 of the SAC.

423. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 423 of the SAC.

424. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 424 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

425. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 425 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

426. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 426 of the SAC.

427. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 427 of the SAC.

428. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 428 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

429. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 429 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

430. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 430 of the SAC.

431. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 431 of the SAC.

432. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 432 of the SAC.

433. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 433 of the SAC.

434. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 434 of the SAC.

435. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 435 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

436. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 436 of the SAC.

437. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 437 of the SAC.

438. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 438 of the SAC.

439. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 439 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

440. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 440 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

441. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 441 of the SAC.

442. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 442 of the SAC.

443. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 443 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

444. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 444 of the SAC.

445. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 445 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

446. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 446 of the SAC.

447. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 447 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

448. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 448 of the SAC.

449. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 449 of the SAC.

450. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 450 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

451. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 451 of the SAC.

452. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 452 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

453. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 453 of the SAC.

454. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 454 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

455. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 455 of the SAC.

456. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 456 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

457. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 457 of the SAC.

458. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 458 of the SAC.

459. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 459 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

460. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 460 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

461. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 461 of the SAC.

462. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 462 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

463. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 463 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

464. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 464 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

465. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 465 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

466. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 466 of the SAC.

467. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 467 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

468. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 468 of the SAC.

469. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 469 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

470. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 470 of the SAC.

471. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 471 of the SAC.

472. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 472 of the SAC.

473. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 473 of the SAC.

474. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 474 of the SAC.

475. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 475 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

476. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 476 of the SAC.

477. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 477 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

478. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 478 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

479. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 479 of the SAC.

480. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 480 of the SAC.

481. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 481 of the SAC.

482. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 482 of the SAC.

483. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 483 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

484. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 484 of the SAC.

485. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 485 of the SAC.

486. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 486 of the SAC.

487. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 487 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

488. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 488 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

489. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 489 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

490. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 490 of the SAC.

491. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 491 of the SAC.

492. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 492 of the SAC.

493. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 493 of the SAC.

494. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 494 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

495. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 495 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

496. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 496 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and respectfully refer the Court to the document referred to therein for its full content.

497. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 497 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

498. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 498 of the SAC.

499. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 499 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

500. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 500 of the SAC.

501. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 501 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

502. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 502 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

503. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 503 of the SAC.

504. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 504 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

505. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 505 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

506. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 506 of the SAC.

507. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 507 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

508. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 508 of the SAC.

509. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 509 of the SAC.

510. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 510 of the SAC.

511. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 511 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

512. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 512 of the SAC.

513. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 513 of the SAC.

514. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 514 of the SAC.

515. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 515 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

516. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 516 of the SAC.

517. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 517 of the SAC.

518. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 518 of the SAC.

519. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 519 of the SAC.

520. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 520 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

521. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 521 of the SAC.

522. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 522 of the SAC.

523. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 523 of the SAC.

524. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 524 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

525. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 525 of the SAC.

526. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 526 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

527. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 527 of the SAC.

528. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 528 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

529. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 529 of the SAC.

530. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 530 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

531. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 531 of the SAC.

532. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 532 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

533. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 533 of the SAC.

534. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 534 of the SAC.

535. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 535 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

536. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 536 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

537. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 537 of the SAC.

538. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 538 of the SAC.

539. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 539 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

540. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 540 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

541. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 541 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

542. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 542 of the SAC.

543. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 543 of the SAC.

544. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 544 of the SAC.

545. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 545 of the SAC.

546. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 546 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

547. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 547 of the SAC.

548. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 548 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

549. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 549 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

550. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 550 of the SAC.

551. Deny each and every allegation contained in paragraph 551 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

552. Deny each and every allegation contained in paragraph 552 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

553. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 553 of the SAC.

554. Deny each and every allegation contained in paragraph 554 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

555. Deny each and every allegation contained in paragraph 555 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

556. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 556 of the SAC.

557. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 557 of the SAC.

558. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 558 of the SAC.

559. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 559 of the SAC.

560. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 560 of the SAC.

561. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 561 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

562. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 562 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

563. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 563 of the SAC.

564. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 564 of the SAC.

565. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 565 of the SAC.

566. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 566 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

567. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 567 of the SAC.

568. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 568 of the SAC.

569. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 569 of the SAC.

570. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 570 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

571. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 571 of the SAC.

572. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 572 of the SAC.

573. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 573 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

574. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 574 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

575. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 575 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

576. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 576 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

577. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 577 of the SAC.

578. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 578 of the SAC.

579. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 579 of the SAC.

580. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 580 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

581. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 581 of the SAC.

582. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 582 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

583. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 583 of the SAC.

584. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 584 of the SAC.

585. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 585 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

586. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 586 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

587. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 587 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

588. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 588 of the SAC.

589. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 589 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

590. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 590 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

591. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 591 of the SAC.

592. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 592 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

593. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 593 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

594. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 594 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

595. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 595 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

596. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 596 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

597. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 597 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

598. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 598 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

599. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 599 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

600. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 600 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

601. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 601 of the SAC, and respectfully refer the Court to the documents referred to therein for their full content.

602. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 602 of the SAC.

603. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 603 of the SAC.

604. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 604 of the SAC.

605. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 605 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

606. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 606 of the SAC.

607. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 607 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

608. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 608 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and respectfully refer the Court to the document referred to therein for its full content.

609. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 609 of the SAC, except admit that Katz was an advisor to Platinum Management.

610. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 610 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

611. Deny each and every allegation contained in paragraph 611 of the SAC, except admit that Agera Energy LLC is a Delaware limited liability company and is an energy reseller to retail and business markets.

612. Admit the allegations contained in paragraph 612 of the SAC.

613. Deny each and every allegation contained in paragraph 613 of the SAC, except admit that Agera Energy LLC was organized on or about March 5, 2014, for the purpose of engaging in retail energy marketing and related services, and that, in June 2014, Agera Energy LLC acquired the ownership of certain assets of Glacial Energy Holdings and its affiliates and assumed the retail electric and gas business of Glacial.

614. Deny each and every allegation contained in paragraph 614 of the SAC.

615. Deny each and every allegation contained in paragraph 615 of the SAC, except admit that Principal Growth Strategies LLC (“PGS”) was the holder of a Second Amended and Restated Secured Convertible Promissory Note issued by Agera Holdings LLC, dated June 9, 2016, which was convertible into 95.01% of the equity in Agera Holdings LLC (the “Convertible Note”), and respectfully refer the Court to the document referred to therein for its full content.

616. Deny each and every allegation contained in paragraph 616 of the SAC, except admit that, between June 2014 and June 2016, Cassidy was employed by Agera Energy LLC as its Executive Managing Director, Marketing and Acquisitions.

617. Deny each and allegation contained in paragraph 617 of the SAC, aver that Optionable, Inc. was a publicly traded brokerage firm, was never a “fund,” and it did not “hold” natural gas derivatives, and respectfully refer the Court to the plea allocution and judgment for their full contents.

618. Deny each and every allegation contained in paragraph 618 of the SAC, except admit that Agera Energy LLC employed Cassidy as its Executive Managing Director, Marketing and Acquisitions.

619. Deny each and every allegation contained in paragraph 619 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

620. Admit the allegations contained in paragraph 620 of the SAC.

621. Admit the allegations contained in paragraph 621 of the SAC.

622. Admit the allegations contained in paragraph 622 of the SAC.

623. Admit the allegations contained in paragraph 623 of the SAC.

624. Admit the allegations contained in paragraph 624 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

625. Deny each and every allegation contained in paragraph 625 of the SAC, except admit that, commencing in 2014, Michael Nordlicht was employed by Agera Energy LLC as a Vice President, Legal and Operations Manager, and he acted as general counsel.

626. Deny each and every allegation contained in paragraph 626 of the SAC.

627. Deny each and every allegation contained in paragraph 627 of the SAC.

628. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 628 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

629. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 629 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

630. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 630 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

631. Deny each and every allegation contained in paragraph 631 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

632. Deny each and every allegation contained in paragraph 632.

633. Deny each and every allegation contained in paragraph 633 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

634. Deny each and every allegation contained in paragraph 634 of the SAC.

635. Deny each and every allegation contained in paragraph 635 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

636. Deny each and every allegation contained in paragraph 636 of the SAC.

637. Deny each and every allegation contained in paragraph 637 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

638. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 638 of the SAC.

639. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 639 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

640. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 640 of the SAC.

641. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 641 of the SAC.

642. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 642 of the SAC.

643. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 643 of the SAC, except admit that PGS sold its interest in the Convertible Note to AGH Parent LLC on or about June 9, 2016, and that Huberfeld was arrested on June 8, 2016.

644. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 644 of the SAC.

645. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 645 of the SAC, except admit that AGH Parent LLC amended its Limited Liability Company Agreement on June 9, 2016, and respectfully refer the Court to the document referred to therein for its full contents.

646. Deny each and every allegation contained in paragraph 646 of the SAC, except admit that Narain executed the Amended and Restated Limited Liability Company Agreement of AGH Parent LLC on behalf of AGH Parent LLC, BBLN-Agera Corp., BHLN-Agera Corp., and BOLN-Agera Corp., and that AGH Parent was advised by outside counsel in connection with the June 9, 2016 “Agera Transactions,” and respectfully refer the Court to the document referred to therein for its full contents.

647. Admit the allegations contained in paragraph 647 of the SAC, and respectfully refer the Court to the document referred to therein for its full contents.

648. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 648 of the SAC, except admit that, as set forth in § 2.4 of the Purchase Agreement (SAC Exhibit 90), the “aggregate consideration to be paid at the closing” for the interest in the Convertible Note was \$170,000,000.00.

649. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 649 of the SAC, except deny that Michael Nordlicht or Kevin Cassidy had knowledge of SAC Exhibit 71, and respectfully refer the Court to the document referred to therein for its full contents.

650. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 650 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

651. Deny each and every allegation contained in paragraph 651 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

652. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 652 of the SAC, and respectfully refer the Court to the document referred to therein for its full contents.

653. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 653 of the SAC, and respectfully refer the Court to the document referred to therein for its full contents.

654. Deny each and every allegation contained in paragraph 654 of the SAC.

655. Deny each and every allegation contained in paragraph 655 of the SAC, expect admit that Kevin Cassidy was not an employee of Platinum Management, PPVA, or PGS.

656. Deny each and every allegation contained in paragraph 656 of the SAC, expect admit that the First Amendment to the Operating Agreement of PGS was executed on or about June 9, 2016, and respectfully refer the Court to the document referred to therein for its full content.

657. Deny each and every allegation contained in paragraph 657 of the SAC, expect admit that a Purchase Agreement was entered into between PGS and Starfish Capital, Inc. on June 9, 2016, and respectfully refer the Court to the document referred to therein for its full contents.

658. Deny each and every allegation contained in paragraph 658 of the SAC.

659. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 659 of the SAC.

660. Deny each and every allegation contained in paragraph 660 of the SAC, except admit that a portion of the Note Purchase Price was paid to PGS via 590,400 Class C Units in AGH Parent LLC, and respectfully refer the Court to SAC Exhibits 90-91 for their full contents.

661. Deny each and every allegation contained in paragraph 661 of the SAC, and respectfully refer the Court to the documents referenced therein for their full contents.

662. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 662 of the SAC, and respectfully refer the Court to the document referred to therein for its full contents.

663. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 663 of the SAC, and respectfully refer the Court to the document referred to therein for its full contents.

664. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 664 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

665. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 665 of the SAC.

666. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 666 of the SAC.

667. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 667 of the SAC.

668. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 668 of the SAC, except admit that, in late 2016, AGH Parent LLC was negotiating the sale of AGH Parent LLC or the Convertible Note to a third party.

669. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 669 of the SAC, except admit that, in 2017, AGX Holdings, LLC became the managing member of AGH Parent LLC.

670. Deny each and every allegation contained in paragraph 670 of the SAC, except admit that, by notice of conversion dated April 19, 2018, AGH Parent LLC elected to convert the outstanding principal balance of the Convertible Note, and all accrued and unpaid interest thereon, into 95.01% of the outstanding capital securities of Agera Holdings LLC, which became effective on or about April 20, 2018.

671. Deny each and every allegation contained in paragraph 671 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

672. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 672 of the SAC.

673. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 673 of the SAC.

674. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 674 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

675. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 675 of the SAC.

676. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 676 of the SAC.

677. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 677 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

678. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 678 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

679. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 679 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

680. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 680 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

681. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 681 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

682. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 682 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

683. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 683 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

684. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 684 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

685. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 685 of the SAC.

686. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 686 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

687. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 687 of the SAC.

688. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 688 of the SAC.

689. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 689 of the SAC.

690. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 690 of the SAC.

691. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 691 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

692. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 692 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

693. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 693 of the SAC.

694. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 694 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

695. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 695 of the SAC.

696. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 696 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

697. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 697 of the SAC.

698. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 698 of the SAC.

699. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 699 of the SAC.

700. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 700 of the SAC.

701. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 701 of the SAC.

702. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 702 of the SAC.

703. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 703 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

704. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 704 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

705. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 705 of the SAC.

706. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 706 of the SAC.

707. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 707 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

708. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 708 of the SAC.

709. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 709 of the SAC.

710. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 710 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

711. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 711 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

712. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 712 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

713. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 713 of the SAC.

714. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 714 of the SAC.

715. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 715 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

716. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 716 of the SAC.

717. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 717 of the SAC.

718. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 718 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

719. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 719 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

720. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 720 of the SAC.

721. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 721 of the SAC.

722. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 722 of the SAC.

723. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 723 of the SAC.

724. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 724 of the SAC.

725. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 725 of the SAC.

726. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 726 of the SAC.

727. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 727 of the SAC.

728. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 728 of the SAC.

729. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 729 of the SAC.

730. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 730 of the SAC.

731. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 731 of the SAC.

732. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 732 of the SAC.

733. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 733 of the SAC.

734. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 734 of the SAC.

735. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 735 of the SAC.

736. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 736 of the SAC.

737. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 737 of the SAC.

738. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 738 of the SAC.

739. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 739 of the SAC.

740. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 740 of the SAC.

741. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 741 of the SAC.

742. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 742 of the SAC.

743. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 743 of the SAC.

744. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 744 of the SAC.

745. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 745 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

746. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 746 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

747. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 747 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

748. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 748 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

749. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 749 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

750. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 750 of the SAC.

751. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 751 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

752. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 752 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

753. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 753 of the SAC.

754. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 754 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

755. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 755 of the SAC.

756. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 756 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

757. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 757 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

758. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 758 of the SAC.

759. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 759 of the SAC.

760. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 760 of the SAC.

761. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 761 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

762. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 762 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

763. Repeat and reallege the answers at paragraphs 1-762 as if fully set forth herein.

764. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 764 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

765. Neither admit nor deny as the allegations contained in paragraph 765 consist of legal conclusions to which no responsive pleading is required.

766. Neither admit nor deny as the allegations contained in paragraph 766 consist of legal conclusions to which no responsive pleading is required.

767. Neither admit nor deny as the allegations contained in paragraph 767 consist of legal conclusions to which no responsive pleading is required.

768. Neither admit nor deny as the allegations contained in paragraph 768 consist of legal conclusions to which no responsive pleading is required.

769. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 769 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

770. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 770 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

771. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 771 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

772. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 772 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

773. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 773 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

774. Repeat and reallege the answers at paragraphs 1-773 as if fully set forth herein.

775. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 775 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

776. Neither admit nor deny as the allegations contained in paragraph 776 consist of legal conclusions to which no responsive pleading is required.

777. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 777 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

778. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 778 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

779. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 779 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

780. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 780 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

781. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 781 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

782. Repeat and reallege the answers at paragraphs 1-781 as if fully set forth herein.

783. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 783 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

784. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 784 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

785. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 785 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

786. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 786 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

787. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 787 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

788. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 788 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

789. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 789 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

790. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 790 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

791. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 791 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

792. Repeat and reallege the answers at paragraphs 1-791 as if fully set forth herein.

793. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 793 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

794. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 794 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

795. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 795 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

796. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 796 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

797. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 797 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

798. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 798 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

799. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 799 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

800. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 800 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

801. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 801 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

802. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 802 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

803. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 803 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

804. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 804 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

805. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 805 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

806. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 806 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

807. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 807 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

808. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 808 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

809. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 809 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

810. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 810 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

811. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 811 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

812. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 812 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

813. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 813 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

814. Repeat and reallege the answers at paragraphs 1-813 as if fully set forth herein.

815. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 815 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

816. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 816 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

817. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 817 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

818. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 818 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

819. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 819 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

820. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 820 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

821. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 821 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

822. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 822 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

823. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 823 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

824. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 824 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

825. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 825 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

826. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 826 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

827. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 827 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

828. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 828 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

829. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 829 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

830. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 830 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

831. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 831 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

832. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 832 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

833. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 833 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

834. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 834 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

835. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 835 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

836. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 836 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

837. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 837 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

838. Repeat and reallege the answers at paragraphs 1-837 as if fully set forth herein.

839. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 839 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

840. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 840 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

841. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 841 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

842. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 842 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

843. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 843 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

844. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 844 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

845. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 845 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

846. Repeat and reallege the answers at paragraphs 1-845 as if fully set forth herein.

847. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 847 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

848. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 848 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

849. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 849 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

850. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 850 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

851. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 851 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

852. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 852 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

853. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 853 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

854. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 854 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

855. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 855 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

856. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 856 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

857. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 857 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

858. Repeat and reallege the answers at paragraphs 1-857 as if fully set forth herein.

859. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 859 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

860. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 860 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

861. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 861 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

862. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 862 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

863. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 863 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

864. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 864 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

865. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 865 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

866. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 866 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

867. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 867 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

868. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 868 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

869. Repeat and reallege the answers at paragraphs 1-868 as if fully set forth herein.

870. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 870 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

871. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 871 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

872. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 872 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

873. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 873 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

874. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 874 of the SAC.

875. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 875 of the SAC.

876. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 876 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

877. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 877 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

878. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 878 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

879. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 879 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

880. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 880 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

881. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 881 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

882. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 882 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

883. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 883 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

884. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 884 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

885. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 885 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

886. Repeat and reallege the answers at paragraphs 1-885 as if fully set forth herein.

887. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 887 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

888. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 888 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

889. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 889 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

890. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 890 of the SAC.

891. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 891 of the SAC.

892. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 892 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

893. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 893 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

894. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 894 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

895. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 895 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

896. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 896 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

897. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 897 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

898. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 898 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

899. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 899 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

900. Repeat and reallege the answers at paragraphs 1-899 as if fully set forth herein.

901. Neither admit nor deny the allegations contained in paragraph 901 of the SAC because the Eleventh Count has been dismissed and no responsive pleading is required.

902. Neither admit nor deny the allegations contained in paragraph 902 of the SAC because the Eleventh Count has been dismissed and no responsive pleading is required.

903. Neither admit nor deny the allegations contained in paragraph 903 of the SAC because the Eleventh Count has been dismissed and no responsive pleading is required.

904. Neither admit nor deny the allegations contained in paragraph 904 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

905. Neither admit nor deny the allegations contained in paragraph 905 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

906. Neither admit nor deny the allegations contained in paragraph 906 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

907. Neither admit nor deny the allegations contained in paragraph 907 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

908. Neither admit nor deny the allegations contained in paragraph 908 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

909. Neither admit nor deny the allegations contained in paragraph 909 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

910. Neither admit nor deny the allegations contained in paragraph 910 of the SAC, because the Eleventh Count has been dismissed and no responsive pleading is required.

911. Repeat and reallege the answers at paragraphs 1-910 as if fully set forth herein.

912. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 912 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

913. Neither admit nor deny as the allegations contained in paragraph 913 consist of legal conclusions to which no responsive pleading is required.

914. Deny each and every allegation contained in paragraph 914 of the SAC, except admit that, between June 2014 and June 2016, Cassidy was employed by Agera Energy LLC as its Executive Managing Director, Marketing and Acquisitions.

915. Deny each and every allegation contained in paragraph 915 of the SAC, except admit that Michael Nordlicht was employed by Agera Energy LLC as a Vice President, Legal and Operations Manager, between June 2014, and January 2019.

916. Deny each and every allegation in paragraph 916 of the SAC, except admit that Starfish Capital, Inc. entered into a Purchase Agreement with PGS pursuant to which Starfish Capital, Inc. sold to PGS its 8% partnership interest in PGS, and respectfully refer the Court to SAC Exhibit 92 for its full contents.

917. Deny each and every allegation in paragraph 917 of the SAC.

918. Deny each and every allegation in paragraph 918 of the SAC.

919. Deny each and every allegation in paragraph 919 of the SAC.

920. Deny each and every allegation in paragraph 920 of the SAC.

921. Deny each and every allegation in paragraph 921 of the SAC.

922. Deny each and every allegation in paragraph 922 of the SAC.

923. Deny each and every allegation in paragraph 923 of the SAC.

924. Deny each and every allegation in paragraph 924 of the SAC.

925. Deny each and every allegation in paragraph 925 of the SAC.

926. Repeat and reallege the answers at paragraphs 1-925 as if fully set forth herein.

927. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 927 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

928. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 928 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

929. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 929 of the SAC.

930. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 930 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

931. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 931 of the SAC.

932. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 932 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

933. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 933 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

934. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 934 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

935. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 935 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

936. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 936 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

937. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 937 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

938. Repeat and reallege the answers at paragraphs 1-937 as if fully set forth herein.

939. Deny each and every allegation contained in paragraph 939 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

940. Deny each and every allegation contained in paragraph 940 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

941. Deny each and every allegation contained in paragraph 941 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal

conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

942. Deny each and every allegation contained in paragraph 942 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

943. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 943 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

944. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 944 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

945. Deny each and every allegation contained in paragraph 945 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

946. Deny each and every allegation contained in paragraph 946 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

947. Deny each and every allegation contained in paragraph 947 of the SAC to the extent it relates to Kevin Cassidy, neither admit nor deny those allegations which consist of legal

conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

948. Repeat and reallege the answers at paragraphs 1-947 as if fully set forth herein.

949. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 949 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

950. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 950 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

951. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 951 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

952. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 952 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

953. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 953 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

954. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 954 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

955. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 955 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

956. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 956 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

957. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 957 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

958. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 958 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

959. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 959 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

960. Repeat and reallege the answers at paragraphs 1-959 as if fully set forth herein.

961. Deny each and every allegation contained in paragraph 961 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

962. Deny each and every allegation contained in paragraph 962 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which

consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

963. Deny each and every allegation contained in paragraph 963 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

964. Deny each and every allegation contained in paragraph 964 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

965. Deny each and every allegation contained in paragraph 965 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

966. Deny each and every allegation contained in paragraph 966 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

967. Deny each and every allegation contained in paragraph 967 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

968. Repeat and reallege the answers at paragraphs 1-967 as if fully set forth herein.

969. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 969 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

970. Neither admit nor deny as the allegations contained in paragraph 970 consist of legal conclusions to which no responsive pleading is required.

971. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 971 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

972. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 972 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

973. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 973 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

974. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 974 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

975. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 975 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

976. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 976 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

977. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 977 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

978. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 978 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

979. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 979 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

980. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 980 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

981. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 981 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

982. Neither admit nor deny as the allegations contained in paragraph 982 consist of legal conclusions to which no responsive pleading is required.

983. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 983 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

984. Deny each and every allegation contained in paragraph 984 of the SAC to the extent it relates to Agera Energy, Michael Nordlicht or Kevin Cassidy, and neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

985. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 985 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

986. Repeat and reallege the answers at paragraphs 1-985 as if fully set forth herein.

987. Neither admit nor deny as the allegations contained in paragraph 987 consist of legal conclusions to which no responsive pleading is required.

988. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 988 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

989. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 989 of the SAC.

990. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 990 of the SAC.

991. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 991 of the SAC.

992. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 992 of the SAC.

993. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 993 of the SAC.

994. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 994 of the SAC.

995. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 995 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

996. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 996 of the SAC.

997. Deny each and every allegation contained in paragraph 997 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

998. Deny each and every allegation contained in paragraph 998 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

999. Deny each and every allegation contained in paragraph 999 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

1000. Neither admit nor deny as the allegations contained in paragraph 1000 consist of legal conclusions to which no responsive pleading is required.

1001. Repeat and reallege the answers at paragraphs 1-1000 as if fully set forth herein.

1002. Neither admit nor deny as the allegations contained in paragraph 1002 consist of legal conclusions to which no responsive pleading is required.

1003. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1003 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1004. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1004 of the SAC.

1005. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1005 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1006. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1006 of the SAC.

1007. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1007 of the SAC.

1008. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1008 of the SAC.

1009. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1009 of the SAC.

1010. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1010 of the SAC.

1011. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1011 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1012. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1012 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1013. Repeat and reallege the answers at paragraphs 1-1012 as if fully set forth herein.

1014. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1014 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

1015. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1015 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

1016. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1016 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1017. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1017 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1018. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1018 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1019. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1019 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1020. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1020 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1021. Repeat and reallege the answers at paragraphs 1-1020 as if fully set forth herein.

1022. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1022 of the SAC, and respectfully refer the Court to the document referred to therein for its full content.

1023. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1023 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1024. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1024 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1025. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1025 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1026. Deny each and every allegation contained in paragraph 1026 of the SAC to the extent it relates to Michael Nordlicht or Kevin Cassidy, neither admit nor deny those allegations that consist of legal conclusions to which no responsive pleading is required, and deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations.

1027. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1027 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1028. Deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 1028 of the SAC, except neither admit nor deny those allegations which consist of legal conclusions to which no responsive pleading is required.

1029. Repeat and reallege the answers at paragraphs 1-1028 as if fully set forth herein.

1030. Neither admit nor deny the allegations contained in paragraph 1030 of the SAC because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1031. Neither admit nor deny the allegations contained in paragraph 1031 of the SAC because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1032. Neither admit nor deny the allegations contained in paragraph 1032 of the SAC because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1033. Neither admit nor deny the allegations contained in paragraph 1033 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1034. Neither admit nor deny the allegations contained in paragraph 1034 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1035. Neither admit nor deny the allegations contained in paragraph 1035 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1036. Neither admit nor deny the allegations contained in paragraph 1036 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1037. Neither admit nor deny the allegations contained in paragraph 1037 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1038. Neither admit nor deny the allegations contained in paragraph 1038 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1039. Neither admit nor deny the allegations contained in paragraph 1039 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1040. Neither admit nor deny the allegations contained in paragraph 1040 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

1041. Neither admit nor deny the allegations contained in paragraph 1041 of the SAC, because the Twenty-Second Count has been dismissed and no responsive pleading is required.

AFFIRMATIVE DEFENSES

First Affirmative Defense

1042. The SAC fails to state a claim against defendants Kevin Cassidy or Michael Nordlicht upon which relief may be granted.

Second Affirmative Defense

1043. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, under the doctrine of *in pari delicto*.

Third Affirmative Defense

1044. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, because Plaintiffs lack standing under the doctrine established in *Shearson Lehman Hutton, Inc. v. Wagoner*, 944 F.2d 114, 120 (2d Cir. 1991).

Fourth Affirmative Defense

1045. The Fourteenth Count against Kevin Cassidy is barred because the unjust enrichment claims is duplicative of the alleged tort claims and/or an express contract governs the transfer of assets from PGS to Starfish Capital, Inc. in connection with the alleged “Agera Transactions.”

Fifth Affirmative Defense

1046. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, because Plaintiffs failed to mitigate their claimed damages.

Sixth Affirmative Defense

1047. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, because Plaintiffs lack standing to pursue the claims.

Seventh Affirmative Defense

1048. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, because Plaintiffs consented to and/or ratified the conduct alleged to have been wrongful.

Eighth Affirmative Defense

1049. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, by the doctrine of waiver.

Ninth Affirmative Defense

1050. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, by the doctrine of estoppel.

Tenth Affirmative Defense

1051. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, by the doctrine of laches.

Eleventh Affirmative Defense

1052. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, by the doctrine of unclean hands.

Twelfth Affirmative Defense

1053. The relief sought in the SAC is barred, in whole or in part, because of any loss or damage sustained by Plaintiffs was occasioned by the acts, omissions, and/or conduct of persons and/or entities over whom Kevin Cassidy and Michael Nordlicht exercised no control.

Thirteenth Affirmative Defense

1054. The claims alleged in the SAC against Michael Nordlicht and Kevin Cassidy are barred, in whole or in part, because Kevin Cassidy and Michael Nordlicht owed no duties to Plaintiffs at any relevant time.

Fourteenth Affirmative Defense

1055. Plaintiffs' claimed damages are limited, in whole or in part, by the doctrine of setoff.

Fifteenth Affirmative Defense

1056. Plaintiffs' alleged damages, if any, are too speculative and too remote.

Dated: New York, New York
July 12, 2019

**MINTZ, LEVIN, COHN, FERRIS, GLOVSKY
AND POPEO, P.C.**

By: /s/ Therese M. Doherty _____

Therese M. Doherty

LisaMarie F. Collins

The Chrysler Center

666 Third Avenue

New York, New York 10017

Telephone: (212) 935-3000

Facsimile: (212) 983-3115

Email: tdoherty@mintz.com

lfcollins@mintz.com

Lawrence R. Gelber

The Vanderbilt Plaza

34 Plaza Street East, Suite 1107

Brooklyn, New York 11238

Telephone: (718) 638-2383

Facsimile: (718) 857-9339

Email: GelberLaw@aol.com

Attorneys for Defendants

Michael Nordlicht and Kevin Cassidy