

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM BEECHWOOD
LITIGATION

Master Docket No.
1:18-cv-06658-JSR

SENIOR HEALTH INSURANCE
COMPANY OF PENNSYLVANIA,

plaintiff,

against

BEECHWOOD RE LTD., *et al.*,

defendants.

No. 1:18-cv-06658-JSR

DEFENDANT EZRA BEREN'S FIRST SET OF INTERROGATORIES

Pursuant to Federal Rule of Civil Procedure 33 and Local Civil Rule 33.3, defendant Ezra Beren propounds this first set of interrogatories upon the plaintiffs in the above-captioned action.

Instructions and Definitions

These interrogatories adopt the uniform definitions as required by Local Civil Rule 26.3. To the extent that other defined terms are used, they have the same meaning as used in the Amended Crossclaims and Third-Party Complaint in this action.

Interrogatories

With respect to each topic below, identify (1) witnesses with knowledge or information relevant to the subject matter and (2) whether there exist relevant documents and, if so, the custodian, location and general description of such documents:

1. Mr. Beren's dates of employment, role, duties, reporting responsibilities, compensation, or terms of employment as "Vice President of Platinum Management."
2. The allegation that "Beren's LinkedIn profile was a clear attempt to maintain the illusion that the Beechwood Entities and Platinum Management were separate entities."
3. Mr. Beren's dates of employment, role, duties, reporting responsibilities, compensation, or terms of employment at BAM.
4. Mr. Beren's participation in any meetings of the Platinum Management valuation committee;
5. The allegation that Mr. Beren "helped set the inflated PPVA valuations";
6. The allegation that Mr. Beren "personally benefited from [the PPVA valuations] in the form of performance fees based on those valuations."
7. The allegation that Mr. Beren "was heavily involved in numerous aspects of the conspiracy, including the misrepresentation of

PPVA's NAV, the creation of the Beachwood Entities, and the series of transactions between the Beechwood Entities and PPVA, including the Pedevco investments."

8. Any "actual knowledge" by Mr. Beren of "all aspects of the Platinum-Beechwood Scheme."
9. Any "material steps" that Mr. Beren took to "further [the] goals" of the Platinum-Beechwood Scheme.
10. The allegation that Mr. Beren "aided and abetted" any defendants in any breach of fiduciary duties to SHIP or any fraud on SHIP.
11. The allegation that Mr. Beren "played a key role in the conspiracy."
12. Any contribution by Mr. Beren to the valuation assessments of the valuation committees.
13. Any "input" provided by Mr. Beren into "determinations of investment valuations."
14. Any "overt actions" taken by Mr. Beren to facilitate any of the investments that are the subject of this litigation.
15. The allegation that Mr. Beren was "directly involved in the valuation of, or transactions related to, various Platinum investments into which SHIP's funds ultimately were invested."
16. State the portion of damages for which you believe Mr. Beren is responsible with respect to each claim and your computation

thereof, or if you believe him to be jointly and severally liable on all claims so state.

Dated: November 19, 2019
New York, NY



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