

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD
LITIGATION

Case No. 18 Civ. 6658 (JSR)

MARTIN TROTT AND CHRISTOPHER
SMITH, AS JOINT OFFICIAL
LIQUIDATORS AND FOREIGN
REPRESENTATIVES OF PLATINUM
PARTNERS VALUE ARBITRAGE FUND
L.P. (IN OFFICIAL LIQUIDATION), AND
PLATINUM PARTNERS VALUE
ARBITRAGE FUND L.P. (IN OFFICIAL
LIQUIDATION),

Case No. 18 Civ. 10936 (JSR)

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC,
ET AL.,

Defendants.

DEFENDANT DANIEL SAKS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the Second Amended Complaint, dated October 31, 2019, the accompanying Memorandum of Law in Support of Defendant Daniel Saks' Motion for Summary Judgment, Defendant Daniel Saks' Local Rule 56.1 Statement of Material Facts, and the Declaration of Wendy H. Schwartz, as well as all prior pleadings, submissions, and proceedings in the above-captioned litigation, Defendant Daniel Saks will move this Court, before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on March 26, 2020, at 3:30pm, for an order

pursuant to Federal Rule of Civil Procedure 56 granting Saks' motion for summary judgment in all respects, as well as such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, per order of the Court, answering papers, if any, must be served on or before March 6, 2020; and reply papers, if any, must be served on or before March 13, 2020.

Dated: February 14, 2020
New York, New York

BINDER & SCHWARTZ LLP

/s/ Wendy H. Schwartz
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