

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE PLATINUM-BEECHWOOD LITIGATION	:	No. 18 Civ. 6658 (JSR)
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	:	
MARTIN TROTT and CHRISTOPHER SMITH, as Joint	:	
Official Liquidators and Foreign Representatives of	:	
PLATINUM PARTNERS VALUE ARBITRAGE FUND	:	
L.P. (in OFFICIAL LIQUIDATION) and PLATINUM	:	No. 18 Civ. 10936 (JSR)
PARTNERS VALUE ARBITRAGE FUND L.P. (in	:	
OFFICIAL LIQUIDATION),	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
PLATINUM MANAGEMENT (NY) LLC, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF MOTION BY DEFENDANT DAVID BODNER  
TO EXCLUDE THE EXPERT REPORT OF RONALD G. QUINTERO**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Abigail B. Johnston, and all exhibits attached thereto, defendant David Bodner, by and through his undersigned attorneys, hereby moves this Court in the above-captioned action before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007, for an order, pursuant to Federal Rules of Evidence 702 and 403, and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), to exclude the Export Report of Ronald G. Quintero, dated November 14, 2019, offered by the Joint Official Liquidators of Platinum Partners Value Arbitrage Fund L.P.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Order dated April 7, 2020 (ECF No. 622), answering papers are due by June 2, 2020.

Dated: May 19, 2020  
New York, New York

CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

By: /s/ Eliot Lauer

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