



“Beechwood Trusts.” (Compl. ¶ 75). The Beechwood Trusts are then folded into an even larger group called “Beechwood Entities.” (Compl. ¶ 76). The Fourteenth Count of the Complaint purports to state a claim against all the Beechwood Entities, but the Complaint is devoid entirely of any factual allegation of wrongdoing by or through any of the Movant Trusts.

For these reasons and for the reasons set forth in Section I of the Memorandum of Law filed by defendant David Bodner, the Complaint fails to state a claim against the Movant Trusts for which relief can be granted.

Dated: January 9, 2019  
New York, New York

Respectfully submitted,

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