

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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),

Plaintiffs,

v.

PLATINUM MANAGEMENT (NY) LLC, MARK
NORDLICHT, DAVID LEVY, ESTATE of URI
LANDESMAN, MURRAY HUBERFELD, DAVID
BODNER, DAVID STEINBERG, DANIEL SMALL,
et al.

Defendants.

Docket No.: 1:18-cv-10936 (JSR)

**MEMORANDUM OF LAW OF
DEFENDANT ESTATE OF URI
LANDESMAN**

Defendant Estate of Uri Landesman joins the motion of defendant David Bodner (ECF No. 71) to dismiss the complaint for failure to state a claim upon which relief may be granted.

The allegations against the Estate of Uri Landesman, which is alleged to be one of the Platinum Defendants as defined in the Complaint, rely entirely on impermissible group pleading that fails to satisfy the standards of Federal Rules of Civil Procedure 8 and 9(b).

For this reason, and for the reasons set forth in Sections I and II (as to Counts 1-3 and 13 only) of the Memorandum of Law filed by defendant David Bodner (ECF No. 72), the Complaint fails to state a cause of action against the Estate of Uri Landesman for which relief may be granted and should be dismissed.

DUANE MORRIS LLP
A Delaware Limited Liability Partnership

Dated: Newark, New Jersey
January 9, 2019

By: /s/ Eric R. Breslin

Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza
1037 Raymond Blvd., Suite 1800
Newark, New Jersey 07102-3889
(973) 424-2000
*Attorneys for Defendant Estate of Uri
Landesman*