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May 5, 2022

Hon, Elizabeth A. Wolford Chief United States District Judge Kenneth B. Keating Federal Building 100 State Street Rochester, New York 14614

RECEIVED ELIZABETH A. WOLFORD

MAY 0 9 2022

Chief Judge United States District Court Western District of New York

Penn-Star Ins. Co. v. FPM Realty LLC et al. Re:

6:22-cv-06169-EAW Case No.:

Dear Judge Wolford

I represent the plaintiff, Penn-Star Insurance Company ("Penn Star"), and I write to Your Honor. Further to my prior email to the Court, to explain that I am in the process of being admitted, having submitted to the Clerk of the Court the paperwork on the basis that I am admitted in the EDNY in good standing, and to request, with the consent of all parties who have appeared in this action (note that Rosewood, Fros and LME have defaulted and we have held off on a motion with permission of the EDNY), an extension of 30 days to respond to the April 25, 2022 Order to Show Cause as to the Court's diversity jurisdiction. I ask for the extension in order to be admitted before filing the documents requested as well as to work with counsel to confirm diversity jurisdiction. I have already asked counsel who have appeared to consult with their client as to their citizenship in order to confirm diversity jurisdiction or identify any dispute in that respect, and I also reconfirming my research from prior to filing the action in the EDNY as to the basis for diversity jurisdiction in order to comply with Your Honor's directive.

Respectfully Submitted,

Core Ventuisti

MIRANDA SLONE SKLARIN VERVENIOTIS LLP

Steven Verveniotis