

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA CENTRAL DIVISION

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| MARCI CLARK, Plaintiff, vs. DAVID GRISHMAN, REDROCK LITERARY, INC. and PINK SAND PRESS, LLC, Defendants. | No. 4:21-cv-392 SUPPLEMENTAL § 1446(a) STATEMENT |
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COMES NOW the Plaintiff, Marci Clark, and in response to this Court's Order requesting a supplemental § 1446(a) statement sufficient for this Court to determine whether complete diversity of citizenship is satisfied in this case, states as follows:

1. Plaintiff named Pink Sand Press, LLC, a Massachusetts limited liability company, as a Defendant in this lawsuit.
2. The manager of Pink Sand Press, LLC is listed as Steven Grishman. Exhibit 1.
3. After the filing date of the present action on December 15, 2021, it was discovered that Pink Sand Press, LLC was involuntarily dissolved by court order or by the Massachusetts Secretary of State on June 30, 2021. Exhibit 1.
4. Upon information and belief, Steven Grishman is a citizen of Georgia.
5. Because Pink Sand Press, LLC is no longer an active legal entity, Plaintiff is filing an Amended Complaint contemporaneously with this statement removing Pink Sand Press, LLC as a Defendant and adding Steven Grishman in his individual capacity.
6. Because Steven Grishman is a citizen of Georgia, all other Defendants are citizens of Massachusetts, and Plaintiff is a citizen of Iowa, complete diversity exists and this Court thus has original jurisdiction over all claims asserted in this case.

Respectfully submitted,

Dated: January 3, 2022

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