

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ATAIN SPECIALTY INSURANCE
COMPANY,

Plaintiff,

vs.

Case No.: 1:26-cv-01668-JPB

TRINITY SNK CORPORATION,
f/k/a Global Management and
Investment Corporation;
RADHESHVAR LLC, d/b/a Motel 6
and d/b/a Super 8; CPLG
PROPERTIES, LLC; KUZZINS
BUFORD, LLC and THE RITZ-
CARLTON HOTEL COMPANY,
LLC,

Defendants.

**ATAIN SPECIALTY INSURANCE COMPANY'S
RESPONSE TO SHOW CAUSE ORDER**

COMES NOW, ATAIN SPECIALTY INSURANCE COMPANY ("Atain"),
Plaintiff in the above-styled civil action and, through the undersigned counsel,
hereby responds to this Honorable Court's Order to Show Cause as to why the instant
civil matter should not be dismissed for lack of subject matter jurisdiction.

As an initial matter, the undersigned acknowledges that the inclusion of “upon information and belief” in the jurisdictional paragraphs was improper. Notwithstanding same, the undersigned believed that their Complaint for Declaratory Judgment was accurate based on the information available and its investigation with respect to the citizenship of the members of the respective limited liability company defendants.

Recognizing that further investigation into the citizenship of the limited liability company defendants is warranted, the undersigned states they intend to dismiss the instant matter, without prejudice, to conduct same. After further investigation, the undersigned intends to re-file the Complaint. Accordingly, a Notice of Voluntary Dismissal, without prejudice, is forthcoming.

This 6th day of April, 2026.

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