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May 14, 2019

BY ECF

Hon. James E. d'Auguste
Supreme Court State of New York, New York County
111 Centre Street, Room 934
New York, New York 10013

**Re: Jerry Cadigan, et. al. v. Liberty Helicopters, Inc., et. al.
Index No. 152286/2018**

Dear Honorable Sir:

We are the attorneys for Defendant Apical Industries, Inc. (d/b/a DART Aerospace) in the captioned matter. As your Honor will recall, following oral argument on Defendant Apical's Motion to Dismiss for lack of personal jurisdiction, your Honor referred this case to Justice Charles Ramos to oversee discovery limited to personal jurisdiction.

Plaintiffs have now reached an agreement with Defendant Apical whereby Apical will submit to the jurisdiction of the Court (for this case only) in exchange for a withdrawal of Plaintiffs' claim seeking punitive damages against Defendant Apical. As such, we would appreciate if your Honor would "so order" and enter the attached stipulation and notify Justice Ramos that the limited jurisdictional discovery conference scheduled before him on May 21, 2019 should be cancelled.

Thank you for your attention to this matter. We look forward to hearing further from the Court in due course.

Respectfully submitted,

KMA ZUCKERT LLC

A handwritten signature in black ink, appearing to read "Anthony W. Eckert III", with a long horizontal flourish extending to the right.

Anthony W. Eckert III

cc: Hon. Charles Ramos
All Counsel