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April 9, 2021

Hon. David N. Hurd, U.S. District Judge
Alexander Pirnie Federal Bldg. and U.S. Courthouse
10 Broad Street
Utica, NY 13501

Hon. Daniel J. Stewart, U.S. Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway - 4th Floor
Albany, NY 12207

Re: Supplemental Authority for Filing in *Mohawk Gaming Enterprises v. Affiliated FM Ins. Co.*, Case No.: 8:20-cv-00701-DNH-DJS

Dear Judge Hurd:

Plaintiff attaches hereto a supplemental authority in support of its Opposition to Defendant's Cross-Motion for Judgment on the Pleadings: *Thor Equities v. Factory Mutual Ins. Co.*, 20-cv-3380, Memorandum and Order (March 31, 2021).

Respectfully submitted,

/s/ Marsha K. Schmidt
Attorney for the St. Regis Mohawk Tribe

Cc: All Counsel by ECF Filing