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March 26, 2025

Via ECF

The Honorable Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza E
Brooklyn, NY 11201

**Re: *Kolbert v. Benworth Capital Partners LLC et al.*, Case No. 1:25-cv-00117-FB-VMS
Joinder in Benworth Defendants' Pre-Motion Letter**

Dear Judge Block:

Defendant Claudia Navarro (“**Ms. Navarro**”) hereby joins in the pre-motion letter (ECF# 17) previously filed by Co-Defendants Benworth Capital Partners PR LLC and Benworth Financial LLC, (collectively, the “**Benworth Defendants**”). In footnote 2 of the Benworth Defendants’ pre-motion letter, we advised this Court that Ms. Navarro had not been served and we did not appear on her behalf. Last Friday, Plaintiff Kolbert filed a Returned Executed Notice Summons (ECF# 19) alleging service of process on Ms. Navarro. Today, we are filing a notice of appearance on behalf of Ms. Navarro and hereby incorporate by reference the defenses set forth in the Benworth Defendants’ pre-motion letter, as well as, reserving her rights to move to dismiss the Complaint on grounds of improper service of process and lack of personal jurisdiction. A pre motion conference is currently scheduled for April 10, 2025 at 4:00 PM (ECF #18).

Respectfully submitted,

/s/ Sean C. Sheely

cc: Counsel of Record (*via ECF*)