



The Court notes that, because Circle Centre is alleged to be a limited liability company, [\[Filing No. 1 at 2\]](#), its citizenship is “the citizenship of all the limited partners, as well as of the general partner,” [Hart v. Terminex Int’l, 336 F.3d 541, 542 \(7th Cir. 2003\)](#), and that citizenship “must be traced through however many layers of partners or members there may be,” [Id. at 543](#). Asserting that all partners are citizens of “X” or that no partners are citizens of “X” is insufficient. See [Peters v. Astrazeneca LP, 224 Fed. Appx. 503, 505 \(7th Cir. 2007\)](#). The Court recognizes and appreciates the lengths to which Zurich has gone to trace the organizational structure of Circle Centre, and provide the citizenship of each entity involved in Circle Centre’s ownership. However, due to some uncertainty in Zurich’s statements regarding citizenship – e.g., Zurich prefaces many of its jurisdictional statements with the phrase “[b]ased on the investigation Zurich has been able to undertake to this point” – and the complicated structure of Circle Centre, coupled with the fact that some of the entities in Circle Centre’s organizational structure appear to no longer be viable,<sup>2</sup> the Court is concerned that Zurich’s statements may not represent Circle Centre’s current organizational structure and/or the citizenship of the entities involved in its ownership.

For these reasons, the Court **ORDERS** the parties<sup>3</sup> to file a joint jurisdictional statement by **July 24, 2014**, detailing the citizenship of each party and whether the amount in controversy exceeds \$75,000, exclusive of interest and costs. To assist the Court, the parties should include a diagram reflecting Circle Centre’s organizational structure. If the parties cannot agree on the

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<sup>2</sup> Specifically, Zurich states that Circle Centre Development Company is the sole member of Circle Centre and was a limited partnership that “was cancelled on or about May 2, 1994,” [\[Filing No. 1 at 3\]](#), and that SD Property Group, Inc. and SPG Properties, Inc. were “at one time” partners of Simon Property Group, L.P., but no longer exist, [\[Filing No. 1 at 3-4\]](#).

<sup>3</sup> While counsel for Defendant Old Republic has not yet entered an appearance, Zurich states that it has determined who will be representing Old Republic. [\[Filing No. 1 at 2.\]](#) The parties should endeavor to include Old Republic in the joint jurisdictional statement.

contents of a joint statement, competing statements must be filed by that date. Filing a compliant statement will satisfy Circle Centre's, Simon's, and XL's obligations under Local Rule 81-1.

**Distribution via ECF only to all counsel of record**