Exhibit D

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

HAVANA DOCKS CORPORATION,

Plaintiff,

v.

Civil Action No.
19-cv-21724

CARNIVAL CORPORATION d/b/a CARNIVAL CRUISE LINE, a foreign corporation,

Defendant.
_____/

CARNIVAL CORPORATION'S AMENDED INITIAL DISCLOSURE
PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)

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Defendant Carnival Corporation ("Carnival") makes the following disclosures to Plaintiff Havana Docks Corporation, pursuant to Federal Rule of Civil Procedure 26(a)(1). These disclosures are based on preliminary information that is reasonably and currently available at this time and Carnival reserves the right to supplement the disclosures as additional information is discovered.

These disclosures are made solely for purposes of this action. By these disclosures, Carnival does not represent that it has identified every document, tangible thing, or witness relevant to this action. Continuing investigation and discovery may alter these disclosures. Accordingly, Carnival reserves the right to supplement the information disclosed if additional information becomes available. These disclosures are also not intended to waive any right to object to the production of any document or tangible thing disclosed on the basis of any privilege, work-product doctrine, relevancy, undue burden, or any other valid objection. No incidental or implied admissions are intended by these disclosures:

A. Persons Likely to Have Discoverable Information and Subjects of Information

Carnival's investigation is ongoing and Carnival reserves the right to supplement the list of individuals disclosed below. Carnival provides the name and, if known, the address and telephone number of each individual likely to have discoverable information that Carnival may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information, in the list that follows below. Carnival additionally reserves the right to rely on and call at trial any witness who may be deposed in this matter.

1. Arnaldo Perez
   General Counsel
   C/O Stuart H. Singer
   401 E. Las Olas Blvd.
   Suite 1200

Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana, that the cruises were lawfully authorized by licenses from the federal government, and that use of the cruise terminal at Havana Port was necessary to lawful travel.

2. Jose Fernandez
VP, Strategy and Business Development
C/O Stuart H. Singer
401 E. Las Olas Blvd.
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Fort Lauderdale, FL 33301
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Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana and that the cruises were lawfully authorized by licenses from the federal government.

3. Sepedeh Tofigh
Associate General Counsel
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Information concerning Carnival's cruises to Havana and that the cruises were lawfully authorized by licenses from the federal government.

4. Tara Russell
SVP, Global Impact
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Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana and that the cruises were lawfully authorized by licenses from the federal government.

5. Rosamaria Caballaro
Consultant for Cuba Marketing and Operations

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Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana and that the cruises were lawfully authorized by licenses from the federal government.

6. Emmanuel Colina
Cuba Coordinator
C/O Stuart H. Singer
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Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana.

7. Erika Tache
Sr. Dir., Product Development Opportunities and Marketing
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Fax: (954) 356-0022

Information concerning Carnival's cruises to Havana and that the cruises were lawfully authorized by licenses from the federal government.

8. Giora Israel
Sr. Vice President, Ports and Destination Development
C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
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Information concerning Carnival's use of the cruise terminal at Havana Port.

9. Micky Arison
Chairman of Carnival's Board

C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
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Fax: (954) 356-0022

Information concerning Carnival's acquisition of interests in AirTours and Costa, Carnival's role in those organizations, and cruises to Cuba by Carnival and by those organizations.

10. Arnold Donald
President and Chief Executive Officer
C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning Carnival's cruises to Cuba, certain meetings with Cuban officials, and communications with Government officials regarding Carnival's cruises to Cuba.

11. Fred Stein
Vice President of Revenue Planning and Deployment
C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning Carnival's cruises to Cuba, including financial planning and revenue information from those cruises.

12. Directors, officers, and shareholders of Havana Docks Corporation
Current addresses unknown

Potential information concerning the property underlying Plaintiff's claim and the value of Plaintiff's claim.

13. Gabriel Escobar
Deputy Chief of Mission at the U.S. Embassy in Serbia
C/O The Executive Office
Office of the Legal Advisor

600 19th Street, NW
Suite 5.600
Washington, DC 20522

Information about communications with Havana Docks and its owners regarding the use of piers in Cuba, as well as information about any determinations that such use was consistent with the LIBERTAD Act and other statutes.

14. Deanna Kim
Consul General at the U.S. Embassy & Consulates in Mexico
C/O The Executive Office
Office of the Legal Advisor
600 19th Street, NW
Suite 5.600
Washington, DC 20522

Information about communications with Havana Docks and its owners regarding the use of piers in Cuba, as well as information about any determinations that such use was consistent with the LIBERTAD Act and other statuts.

15. Aaron Johnson
Address unknown.

Information about Havana Docks Corporation and any claim allegedly held by Plaintiff.

16. Mickael Behn
Address unknown

Information about Havana Docks Corporation and any claim allegedly held by Plaintiff.

17. Jerry Johnson
215 Southland Drive
Lexington, KY 30503

Information about Havana Docks Corporation and any claim allegedly held by Plaintiff.

18. Robert MacArthur
106 Appleton St.,
Cambridge, MA 02138

Information about Havana Docks Corporation and any claim allegedly held by Plaintiff.

19. Javier Garcia-Bengochea
Address unknown.

Information about conversations with Havana Docks Corporation and conversations with the United States Government regarding Carnival's use of the piers.

20. The Records Custodian for Bank of the Bluegrass & Trust Co.
Name and Address unknown.

Information relating to what records may exist at Bank of the Bluegrass & Trust Co. related to Havana Docs Corporation concerning any claim allegedly held by Plaintiff. The Bank of the Bluegrass & Trust Co. has not yet designated a records custodian, so the name of this witness is not yet known to Carnival.

21. Enrique Miguez
Deputy General Counsel, Carnival Corporation
C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning Carnival's corporate structure, information concerning Carnival subsidiaries, information concerning Carnival's acquisition of interests in AirTours and Costa, and information concerning Carnival acting lawfully in relation to business involving Cuba.

22. Employee of Holland America Line to be Determined
C/O Stuart H. Singer
401 E. Las Olas Blvd.
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Fax: (954) 356-0022

Information concerning HAL's cruises to Cuba.

23. Jorge Delgado
Vice President, Global Business Development, RCCL
C/O Caitlin Saladrigas
Holland & Knight LLP
777 South Flagler Drive, Suite 1900, West Tower
West Palm Beach, FL 33401

Confirming that the use of the cruise terminal at Havana Port was necessary to lawful travel.

24. Gianni Onorato
Chief Executive Officers, MSC Cruises S.A.
C/O Andrew Hernacki
Venable LLP
600 Massachusetts Ave., NW
Washington, DC 20001

Confirming that the use of the cruise terminal at Havana Port was necessary to lawful travel.

25. Captain Luigi Pastena
Former Vice President of Port Operations (MSC Cruises Management (UK) Ltd.)
C/O Andrew Hernacki
Venable LLP
600 Massachusetts Ave., NW
Washington, DC 20001

Confirming that the use of the cruise terminal at Havana Port was necessary to lawful travel.

26. Hugo M. Cancio
President and CEO of Fuego Enterprises
C/O Daniel Balmori
Hogan Lovells US LLP
600 Brickell Avenue
Suite 2700
Miami, FL 33131

Confirming that the use of the cruise terminal at Havana Port was necessary to lawful travel.

27. Frank Del Rio
President and CEO of Norwegian Cruise Line Holdings
C/O Daniel Balmori
Hogan Lovells US LLP
600 Brickell Avenue
Suite 2700
Miami, FL 33131

Confirming that the use of the cruise terminal at Havana Port was necessary to lawful travel.

B. Categories of Documents and Information that Carnival May Use to Support its Defenses

Carnival elects to provide the following description by category and location of all documents, electronically stored information, and tangible things that Carnival has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment. As noted above, Carnival reserves the right to supplement this list, as Carnival's investigation and discovery is ongoing. Unless stated otherwise below, each of these documents can be accessed at the following location: 3655 NW 87th Avenue, Miami, FL. 33178.

1. Documents showing itineraries of Carnival's cruises with ports of call in Havana.
2. Documents relating to planning for cruises to Havana.
3. Documents showing the cruise terminal at Havana Port Carnival used.
4. Documents showing that Carnival's cruises to Cuba were lawful.
5. Documents showing Carnival's payment for use of the cruise terminal at Havana Port.
6. Documents showing that other companies and individuals have used or are using the cruise terminal at Havana Port.
7. Notice of claim from Havana Docks Company.
8. Documents showing that Carnival's use of the cruise terminal at Havana Port was necessary to the conduct of Carnival's lawful travel to Cuba.

C. Computation of Damages

Carnival is not currently seeking any damages in this action. Because its investigation and discovery are ongoing, Carnival reserves the right to amend or supplement these disclosures in the future.

D. Insurance Agreements

Carnival is not aware of any insurance agreement under which any insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or

reimburse for payments made to satisfy the judgment.

Dated: January 20, 2021

Respectfully submitted,

By: *s/ Stuart H. Singer*

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Attorneys for Carnival Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record via email on January 20, 2021.

By:*/s/ Stuart H. Singer*
Stuart H. Singer, Esq.

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