EXHIBIT "12"

Deposition Testimony of Deanna Kim

- Defendants' Omnibus Exhibit 84 includes an email dated August 2, 2018, from an individual named Deanna Kim, Acting Coordinator for the Office of Cuban Affairs at the U.S. Department of State ("Office of Cuban Affairs.).
  (Defs.' Omnibus Ex. 84, at 2.)

- Ms. Kim testified that this August 2, 2018 email did not provide an opinion about, nor an interpretation of, the application of Title III of the LIBERTAD Act.
  (Defs.' Omnibus Ex. 85 (Kim Dep.), at 22:6-14.)

- Ms. Kim testified that the Office of Cuban Affairs does not provide opinion testimony on its interpretation of U.S. statutes, including Title III.
  Id., at 12:2-13, 13:4-19.)

Deposition Testimony of Deanna Kim

- Ms. Kim testified that before sending her email she never reviewed any records or evidence about Defendants' use of the Havana Port Terminal or whether Defendants had complied with any of the OFAC or the Department of Commerce Bureau of Industry and Security's ("BIS") requirements. (*Id*., at 22:15-25:21.)

- Ms. Kim testified that the Office of Cuban Affairs did not investigate violations of Title III during her tenure. (*Id*. at 20:21-21:3.)

Source:
HDC Opp to Defs' Omni SOMF #'s113-119 (ECF 388 in CCO/
ECF No. 255 in MSC/ ECF No. 179 in Royal/ ECF No. 277 in NCL

Same content as:
HDC Opp to CCO SOMF (ECF no. 377)
HDC Opp to MSC SOMF ECF No. 259)
HDC Opp to Royal SOMF (ECF No. 183)
HDC Opp to NCL SOMF (ECF No. 284)