

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 19-23591-CIV-BLOOM/Louis**

HAVANA DOCKS CORPORATION,

Plaintiff,

v.

NORWEGIAN CRUISE LINE  
HOLDINGS LTD.

Defendant.

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**DECLARATION OF JERRY JOHNSON**

I, Jerry Johnson, declare as follows:

1. My name is Jerry Johnson. I am over 21 years of age, I am a citizen a resident of the United States, and I am competent to make this declaration.

2. I make this declaration in my capacity as Vice President, Comptroller, Treasurer, Secretary and Board Member of Havana Docks Corporation (“Havana Docks”), a Delaware corporation with its principal place of business in Kentucky. This declaration is based on my personal knowledge.

3. I began my work on behalf of Havana Docks in the fall of 2011 as engaged by Mickael Behn, Havana Docks Corporation Director, Vice President and Secretary, and by Aphra Behn, Havana Docks Corporation Director and Vice President. Since that time, I have performed numerous duties for Havana Docks, including, but not limited to, the following:

a. maintaining the corporate status active and in good standing to protect Havana Docks' rights under the certified claim to recover the property that was confiscated by the Cuban Government, and/or to receive settlement or compensation under the certified claim;

b. managing Havana Docks' investments;

c. engaging lawyers, lobbyists, and consultants to protect and pursue Havana Docks' rights under the LIBERTAD Act, including planning for all legal actions and instituting all lawsuits filed by Havana Docks;

d. meeting and communicating with United States Government officials to protect and pursue Havana Docks' rights under the LIBERTAD Act;

e. meeting and communicating with other claim owners with common interests with Havana Docks in protecting and pursuing Havana Docks' rights under the LIBERTAD Act;

f. coordinating with the Havana Docks' certified public account ("CPA") each year in regard to the company's Form 1120 tax filing to the IRS;

g. coordinating with the Havana Docks' CPA each year in regard to the annual franchise tax filing to the state of Delaware;

h. maintaining Havana Docks' ledger (balance sheets and income statements);

i. paying all bills on behalf of Havana Docks;

j. updating and maintaining Havana Docks' Stockholders' Registry;

k. coordinating and distributing information to stockholders for annual meetings, and

l. recording results from those meetings.

4. Although I was not a formally elected officer and/or director of Havana Docks when I began performing the duties listed in paragraph 3 above, these services were always performed within the scope of my engagement and duties with Havana Docks.

I declare under the penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed January 15, 2021.



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Jerry Johnson