

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

Case No. 19-cv-23591-BLOOM/Louis

HAVANA DOCKS CORPORATION,

Plaintiff,

v.

NORWEGIAN CRUISE LINE HOLDINGS
LTD.,

Defendant.

**NORWEGIAN'S SECOND AMENDED RESPONSES AND OBJECTIONS TO
HAVANA DOCKS CORPORATION'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and Southern District of Florida Local Rule 26.1(e), Norwegian Cruise Line Holdings Ltd. ("Norwegian" or "NCL"), through undersigned counsel, responds and objects to Plaintiff's First Set of Interrogatories ("Interrogatory" or "Interrogatories"), dated November 4, 2019, as follows¹:

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1:

1. When did NCL first obtain any information, learn, or become aware that the Subject Property had been confiscated by the Cuban Government?

¹ Norwegian's review of its records and other discovery sources is ongoing, and these responses are based on Norwegian's knowledge and investigation to date. In accordance with Federal Rule of Civil Procedure 26(e), Norwegian will supplement the responses provided herein as necessary as discovery and Norwegian's investigation continues.

RESPONSE TO INTERROGATORY NO. 1:

Norwegian objects to this Interrogatory on the grounds that it is vague, ambiguous, and confusing because it is not known what is meant by the term “confiscated” and requires that Norwegian draw legal conclusions. Additionally, Norwegian objects to the definition of the “Cuban Government” as overbroad.

Subject to and without waiving the foregoing objections, Norwegian became aware of Plaintiff’s allegations regarding the Subject Property in February 2017.

INTERROGATORY NO. 2:

2. Explain the reason(s) for the decision to choose the Subject Property as the location to dock the NCL ships, and identify all the persons involved in the decision.

RESPONSE TO INTERROGATORY NO. 2:

The Subject Property was used because it was the only area in Havana designated by Cuba for passengers to embark and disembark lawfully because it exclusively houses medical screening, immigration, and customs. The individuals involved in the decision to use the Subject Property were: Frank Del Rio (Norwegian’s President and Chief Executive Officer), Howard Sherman (Norwegian’s Executive Vice President of Onboard Revenue and Destination Services), Luigi Razeto (Norwegian’s Senior Vice President of Marine Operations), and Mario Parodi (Norwegian’s Vice President of Port and Itinerary Planning).

INTERROGATORY NO. 3:

3. Identify all NCL ships that have docked at or used the Subject Property, and please state the following for each such ship:

(a) the name and registration number of the ship;

(b) the country of registration of the ship;

- (c) the dates the ship left from and returned to a U.S. port, along with the name of the U.S. port(s), and the docking and departure dates of the ship on the Subject Property;
- (d) other locations docked or anchored offshore by the ship during the same cruise and their dates;
- (e) the name of the captain of the ship;
- (f) the name of the crewmember(s) on the ship in charge of the ship's port operations at the Subject Property and at other Cuban ports visited;
- (g) the name of the crewmember(s) on the ship in charge of compliance with the requirements of the LIBERTAD Act, the Cuban Assets Control Regulations, and OFAC licenses;
- (h) the name of the cruise director on the ship;
- (i) the number of passengers onboard the ship and the total amount paid by the passengers for the cruise;
- (j) the names of the passengers onboard the ship disembarking at each destination in Cuba;
- (k) all Cuban shore excursions offered by NCL or any other party to the passengers on the ship, the price of each excursion, and the total number of such excursions purchased; and
- (l) any amount paid to the Cuban Government or any other party for any use of the Subject Property, the date of the payment, the name of the recipient, the reasons for the payment, and any agreement or document relating to the payment.

RESPONSE TO INTERROGATORY NO. 3:

Norwegian responds this Interrogatory as follows:

- (a) and (b): MN Marina (No. IMO: 9438066, Country of Registration: Marshall Islands); MN Norwegian Sky (No. IMO: 9128532, Country of Registration: Bahamas); MN Seven Seas Mariner (No. IMO: 9210139, Country of Registration: Bahamas); MN Insignia (No. IMO: 9156462, Country of Registration: Marshall Islands); MN Regatta (No. IMO: 9156474, Country of Registration: Marshall Islands); MN Sirena (No. IMO: 917899, Country of Registration: Marshall Islands); MN Norwegian Sun (No. IMO: 9218131,

Country of Registration: Bahamas); MN Seven Seas Navigator (No. IMO: 9064126, Country of Registration: Bahamas); MN Seven Seas Voyager (No. IMO: 9247144, Country of Registration: Bahamas); and MN Riviera (No. IMO: 9438078; Country of Registration: Marshall Islands).

(c) and (d): Pursuant to Federal Rule of Civil Procedure 33(d), documents bates labeled NCLH_23591-000019453 are responsive to subparts (c) and (d) of this Interrogatory and will be produced.

(e) and (f): The ship captains were also in charge of the ship's port operations at the ports visited.

Ship Name	Position	Last Name	First Name
Seven Seas Mariner	Captain	Armellino	Ubaldo
Seven Seas Navigator	Captain	Armellino	Ubaldo
Norwegian Sun	Captain	Borg	Lars Ronny Ingemar
Insignia	Captain	Brajcic	Maroje
Norwegian Sky	Captain	Candrlic	Matko
Riviera	Captain	Flokos	Dimitrios
Norwegian Sun	Captain	Grbic	Teo
Seven Seas Mariner	Captain	Green	Daniel Erik
Seven Seas Voyager	Captain	Green	Daniel Erik
Regatta	Captain	Hansen	Jakup Meinhardt
Norwegian Sky	Captain	Jurac	Zeljko
Norwegian Sun	Captain	Karlsson	Kim Roger
Seven Seas Navigator	Captain	Kostadinov	Atanas Georgiev
Regatta	Captain	Kristovic	Luksa
Insignia	Captain	Kurilic	Damir
Regatta	Captain	Loncarica	Antun
Insignia	Captain	Manzi	Luca
Marina	Captain	Manzi	Luca
Seven Seas Mariner	Captain	Melani	Serena
Sirena	Captain	Melnikov	Maksym
Seven Seas Voyager	Captain	Mercier De Lacombe	Stanislas Gerard Jean
Seven Seas Navigator	Captain	Mertzanis	Aristeidis
Insignia	Captain	Morvillo	Luca
Riviera	Captain	Morvillo	Luca

Ship Name	Position	Last Name	First Name
Norwegian Sky	Captain	Nording	Stefan Paul Fredrik
Seven Seas Mariner	Captain	Palm	Aivo
Seven Seas Navigator	Captain	Palm	Aivo
Seven Seas Voyager	Captain	Patruno	Felice
Sirena	Captain	Ressa	Giulio
Regatta	Captain	Romtveit	Gunnar
Riviera	Captain	Romtveit	Gunnar
Riviera	Captain	Sanguinetti	Gianmario
Seven Seas Mariner	Captain	Sanguinetti	Gianmario
Sirena	Captain	Silvachynsky	Vitaliy
Seven Seas Mariner	Captain	Srdelic	Teo
Norwegian Sun	Captain	Stofling	Johan Christopher
Marina	Captain	Strazicic	Leo
Norwegian Sun	Captain	Svardmark	Lars Richard

(g): MN Norwegian Sky (Carlos Romero, OFAC Compliance Officer; Camille Rauscher, OFAC Compliance Officer; Mary Motamedi, OFAC Compliance Officer; Gabrielle Turner, OFAC Compliance Officer; Stephanie Davidson, OFAC Compliance Officer); MN Insignia (Christine Manjencic, Norwegian's Vice President of Destination Services; Carrie Weems, Norwegian's Destination Services, Shore Excursions Regional Manager; Sophia Kider, OFAC Compliance Officer; Corey Powell, OFAC Compliance Officer); MN Regatta (Christine Manjencic, Norwegian's Vice President of Destination Services; Luis Cadenas, Norwegian's Senior Director of Pre and Post Hotel Programing; Vanessa Heredia, Norwegian's Manager of Destinations, Groups, Charters, and Incentives; Lisa Jeanne Peterson, OFAC Compliance Officer; Anthony Milfelt, OFAC Compliance Officer; Chris Hammer, OFAC Compliance Officer; Ray Carr, OFAC Compliance Officer; Hannah Hesseltine, OFAC Compliance Officer); MN Sirena (Philip Barrood, OFAC Compliance Officer; Hannah Hesseltine, OFAC Compliance Officer; Christina Hill, OFAC Compliance Officer; Ian Lah, OFAC Compliance Officer; Cole

Miller, OFAC Compliance Officer; Jini Scoville, OFAC Compliance Officer; Alexis Soto Jr., OFAC Compliance Officer; Emily Viancourt, OFAC Compliance Officer; Chase Wolfe, OFAC Compliance Officer); MN Norwegian Sun (Camille Rauscher, OFAC Compliance Officer; Mary Motamedi, OFAC Compliance Officer); MN Seven Seas Navigator (Luis Cadenas, Norwegian’s Senior Director Pre and Post Hotel Programing); MN Seven Seas Mariner (Carrie Weems, Norwegian’s Destination Services, Shore Excursions Regional Manager); MN Seven Seas Voyager (Carrie Weems, Norwegian’s Destination Services, Shore Excursions Regional Manager; Andy Heath, OFAC Compliance Officer); and MN Riviera (Christine Manjencic, Norwegian’s Vice President of Destination Services; Alexis Saroukos, OFAC Compliance Officer; Brittany Howk, OFAC Compliance Officer; Kelsey Schroeder, OFAC Compliance Officer; Cameron Morgan, OFAC Compliance Officer; Robert Tait, OFAC Compliance Officer; Micah Ndiba, OFAC Compliance Officer; Xavier Perkins, OFAC Compliance Officer).

(h):

Ship Name	Position	Last Name	First Name
Riviera	Cruise Director	Barron	John Paul
Seven Seas Mariner	Cruise Director	Barron	John Paul
Regatta	Cruise Director	Baya	Paul Emery
Norwegian Sky	Cruise Director	Booth	Claire Suzanne
Norwegian Sun	Cruise Director	Caro Rodriguez	Jeimy Alexandra
Insignia	Cruise Director	Carr	Raymond Warren
Regatta	Cruise Director	Carr	Raymond Warren
Insignia	Cruise Director	Carter	Shawn Mark
Regatta	Cruise Director	Carter	Shawn Mark
Riviera	Cruise Director	Carter	Shawn Mark
Marina	Cruise Director	Clelford	John Daniel
Sirena	Cruise Director	Clelford	John Daniel
Norwegian Sun	Cruise Director	Collina	Adriano
Norwegian Sun	Cruise Director	De Pasquale	Roberto

Ship Name	Position	Last Name	First Name
Norwegian Sun	Cruise Director	Di Benedetto Garcia	Guido
Norwegian Sky	Cruise Director	Dizon	Joel
Marina	Cruise Director	Ekin IV	John Jamison
Riviera	Cruise Director	Ekin IV	John Jamison
Seven Seas Mariner	Cruise Director	Ekin IV	John Jamison
Riviera	Cruise Director	Heath	John Andrew
Seven Seas Mariner	Cruise Director	Heath	John Andrew
Seven Seas Voyager	Cruise Director	Heath	John Andrew
Seven Seas Mariner	Cruise Director	Hook	Raymond John
Seven Seas Navigator	Cruise Director	Hook	Raymond John
Seven Seas Voyager	Cruise Director	Hook	Raymond John
Norwegian Sky	Cruise Director	Hopkins	Thomas Sven
Norwegian Sky	Cruise Director	Imperial	Ferdinand
Regatta	Cruise Director	James	Julie Anne
Sirena	Cruise Director	James	Julie Anne
Norwegian Sun	Cruise Director	Klooster	David
Regatta	Cruise Director	Kulasa Drake	Dorothea
Riviera	Cruise Director	Kulasa Drake	Dorothea
Sirena	Cruise Director	Kulasa Drake	Dorothea
Seven Seas Navigator	Cruise Director	Logan	James Gregory
Insignia	Cruise Director	Martinez	Leslie Jon
Marina	Cruise Director	Martinez	Leslie Jon
Riviera	Cruise Director	Martinez	Leslie Jon
Sirena	Cruise Director	Martinez	Leslie Jon
Seven Seas Voyager	Cruise Director	Nevin	David Alistair
Norwegian Sun	Cruise Director	Olsson	Daniel Coe
Insignia	Cruise Director	Powell	Corey Andrew
Regatta	Cruise Director	Powell	Corey Andrew
Riviera	Cruise Director	Powell	Corey Andrew
Sirena	Cruise Director	Powell	Corey Andrew
Norwegian Sky	Cruise Director	Quiniano	Alvin Celaje
Seven Seas Mariner	Cruise Director	Reynolds	Paul John
Seven Seas Navigator	Cruise Director	Reynolds	Paul John
Seven Seas Voyager	Cruise Director	Reynolds	Paul John
Marina	Cruise Director	Roberts	Peter
Riviera	Cruise Director	Roberts	Peter
Norwegian Sky	Cruise Director	Sanchez	John Jeremiah Labez

Ship Name	Position	Last Name	First Name
Regatta	Cruise Director	Scoggins	Margaret Lynn
Seven Seas Mariner	Cruise Director	Scoggins	Margaret Lynn
Seven Seas Navigator	Cruise Director	Scoggins	Margaret Lynn
Seven Seas Voyager	Cruise Director	Scoggins	Margaret Lynn
Norwegian Sun	Cruise Director	Tang	Jacky
Marina	Cruise Director	Turner Jr.	Carson Stephen
Sirena	Cruise Director	Turner Jr.	Carson Stephen
Norwegian Sun	Cruise Director	Valeriotte	Julie Andrea
Norwegian Sky	Cruise Director	Valeriotte	Julie Andrea
Norwegian Sun	Cruise Director	Wade	Ronald Lee Rashon
Norwegian Sky	Cruise Director	Wade	Ronald Lee Rashon
Seven Seas Mariner	Cruise Director	Weimerskirch	Lorraine Kathleen Mauvorneen

(i): Norwegian objects to providing payment information related to each of its guests, as such information is overly burdensome, sensitive, and not proportional to the needs of the case. Norwegian further objects to providing payment information on the grounds that it would result in the unwarranted disclosure of Norwegian's customer information as well as Norwegian's sensitive non-public proprietary information or trade secret material that would result in an unfair advantage to Norwegian's competitors. Subject to and without waiving the foregoing objections, pursuant to Federal Rule of Civil Procedure 33(d) documents bates labeled NCLH_23591-00011080 through NCLH_23591-00011086, NCLH_23591-00011094 through NCLH_23591-00011100, NCLH_23591-00011439 through NCLH_23591-00011444, NCLH_23591-00011455 through NCLH_23591-00011457, NCLH_23591-00011458 through NCLH_23591-00011459, NCLH_23591-00011763 through NCLH_23591-00011768, NCLH_23591-00011769 through NCLH_23591-00011775, NCLH_23591-00011776 through NCLH_23591-00011783, NCLH_23591-00011804 through NCLH_23591-00011810, NCLH_23591-00011867

through NCLH_23591-00011868, NCLH_23591-00011944 through NCLH_23591-00011946, NCLH_23591-00011948 through NCLH_23591-00011950, NCLH_23591-00012019 through NCLH_23591-00012024, NCLH_23591-00012025 through NCLH_23591-00012030, NCLH_23591-00012031 through NCLH_23591-00012036, NCLH_23591-00012044 through NCLH_23591-00012050, NCLH_23591-00012085 through NCLH_23591-00012087, NCLH_23591-00016224 through NCLH_23591-00016230, NCLH_23591-00016523 through NCLH_23591-00016525 are responsive to subpart (i) of this Interrogatory concerning the identity of the passengers.

(j) Norwegian objects to providing disembarkation information for each port because such information is overly burdensome and not proportional to the needs of this case, including because this action relates only to Norwegian's use of the Subject Property, not any other property. Subject to and without waiving the foregoing objections, pursuant to Federal Rule of Civil Procedure 33(d) documents bates labeled NCLH_23591-00019454 through NCLH_23591-00019455 are responsive to subpart (j) of this Interrogatory concerning Havana and will be produced.

(k) Norwegian objects to providing information about shore excursions offered at any port other than Havana or offered by any other party because such information is overly burdensome and not proportional to the needs of this case. Norwegian further objects to providing payment and sales information on the grounds that it would result in the unwarranted disclosure of Norwegian's sensitive non-public proprietary information or trade secret material that would result in an unfair advantage to Norwegian's competitors. Subject to and without waiving the foregoing objections, Norwegian will produce documents that are responsive to subpart (k) of this Interrogatory and following their

production, Norwegian will amend its response to this subpart to identify those documents in accordance with the Federal Rules of Civil Procedure.

(l): Pursuant to Federal Rule of Civil Procedure 33(d) documents bates labeled NCLH_23591-00014316 and NCLH_23591-00014318 are responsive to subpart (l) of this Interrogatory. The purposes of the payments made to each payee identified in the documents bates labeled NCLH_23591-00014316 and NCLH_23591-00014318 are as follows:

1. Aries, S.A.: Provision of port berthing operations services for passenger cruises in Cuba.
2. Empresa Consignataria Mambisa: Provision of port agent operations services for passenger cruises in Cuba.

INTERROGATORY NO. 4:

4. Identify all other payments made by NCL relating to its use of the Subject Property not identified in Interrogatory No. 1(l), and for each such payment state: (a) the amount; (b) the date; (c) the recipient; (d) the reason(s) for the payment; and (e) identify any agreement or document relating to the payment.

RESPONSE TO INTERROGATORY NO. 4:

It appears this request, as formulated, contains a typographical error. There is no property identified in Interrogatory 1(l). Norwegian interprets this request to seek information related to property identified in Request 3(l). Norwegian responds to this Interrogatory as follows: Pursuant to Federal Rule of Civil Procedure 33(d) documents bates labeled NCLH_23591-00014317 and NCLH_23591-00014319 are responsive to subpart (l) of this Interrogatory. The purposes of the payments made to each payee identified in the documents bates labeled NCLH_23591-00014316 and NCLH_23591-00014318 are as follows:

1. COMAR, S.A.: Provision of legal services pertaining to cruises to Cuba.
2. Havanatur, S.A.: Provision of excursions and other travel related services to passengers in Cuba.

INTERROGATORY NO. 5:

5. Identify all destinations anywhere in the world where a NCL ship has anchored offshore instead of docking, and for each such occasion identify the NCL ship and the dates the ship anchored and departed.

RESPONSE TO INTERROGATORY NO. 5:

Norwegian objects to this Interrogatory as overbroad and unduly burdensome to the extent that it seeks or calls for information concerning all Norwegian ships, for all times, “anywhere in the world.” Norwegian further objects that this information is not relevant, material, or necessary to the needs of this case, as this case concerns only the Subject Property located in Havana, not Cuba generally. As stated in Norwegian’s Response to Interrogatory No. 2, there were no alternatives to using the Subject Property because it was the only area in Havana designated by Cuba for passengers to embark and disembark lawfully because it exclusively houses medical screening, immigration, and customs. Norwegian further objects to this Interrogatory as not proportional to the needs of the case in that it seeks information on anchoring sites that are not comparable to the Subject Property. Norwegian objects to the Interrogatory as vague and confusing as it calls for the identification of “destinations” but then seeks information on each “occasion” identified. Norwegian will not further respond to this Interrogatory at this time, but will meet and confer with Plaintiff to resolve these objections.

INTERROGATORY NO. 6:

6. Identify all licenses or authorizations obtained by NCL from the United States Government, including, but not limited to licenses issued by OFAC, concerning NCL’s carrier services to Cuba, and for each license or authorization, state: (a) the date NCL acquired it, (b)

the name of the issuing agency, (c) its expiration date, (d) renewal date; and (e) the purpose of the license or authorization.

RESPONSE TO INTERROGATORY NO. 6:

Norwegian had a general license to provide carrier services to Cuba under the following Office of Foreign Assets Control, Department of the Treasury; and the Bureau of Industry and Security, Department of Commerce regulations: 31 C.F.R. § 515.565, 31 C.F.R. § 515.572, 15 C.F.R. § 740.15, and 15 C.F.R. § 746.2.

INTERROGATORY NO. 7:

7. Identify all NCL employees who have communicated with any agency of the United States Government, including OFAC and the U.S. Coast Guard, concerning NCL's carrier services between the United States and Cuba, including the use of the Subject Property.

RESPONSE TO INTERROGATORY NO. 7:

Norwegian objects to this Interrogatory as overbroad, unduly burdensome, and oppressive in that it seeks the identity of "all" Norwegian employees who have had any communication with the United States Government. Norwegian does not track every conversation every one of its employees has and has no practical or proportional way to search for such information. Norwegian further objects to this Interrogatory to the extent it seeks or calls for the production of documents or information concerning Norwegian employee communications regarding carrier services to "Cuba" that is not relevant, material, or necessary to Norwegian's use of the Subject Property in Havana and, thus, is not proportional to the needs of the case.

Subject to and without waiving the foregoing objections, and to the best of its current knowledge, Norwegian responds as follows: Frank Del Rio (Norwegian's President and Chief Executive Officer), Daniel S. Farkas (Norwegian's Executive Vice President and General

Counsel), and David Herrera (Norwegian's Senior Vice President of Strategy and Business Development).

INTERROGATORY NO. 8:

8. Identify all NCL employees who have communicated with the Cuban Government regarding NCL providing carrier services to Cuba, and the dates of such communications.

RESPONSE TO INTERROGATORY NO. 8:

Norwegian objects to this Interrogatory as overbroad, unduly burdensome, and oppressive in that it seeks the identity of "all" Norwegian employees who have had any communication with the Cuban Government. Norwegian does not track every conversation every one of its employees has and has no practical or proportional way to search for such information. Additionally, Norwegian objects to the definition of the "Cuban Government" as overbroad.

Subject to and without waiving the foregoing objections, and to the best of its current knowledge, Norwegian responds as follows: Frank Del Rio (Norwegian's President and Chief Executive Officer), Lincoln M. Vidal (Norwegian's Vice President and Assistant General Counsel), Steve Moeller (Norwegian's Senior Vice President of Commercial Development), Luigi Razeto (Norwegian's Senior Vice President of Marine Operations), Edel Cruz (Norwegian's Vice President of Strategic Planning), Christine Manjencic (Norwegian's Vice President of Destination Services), Howard Sherman (Norwegian's Executive Vice President of Onboard Revenue and Destination Services), Mario Parodi (Norwegian's Vice President of Port and Itinerary Planning), Louis Ruiz (Norwegian's Senior Director of Port Operations), Jennifer Marmanillo (Norwegian's Director of Itinerary Planning), Danilo Abeleda (Second Purser), Melissa Abrahams (Assignment Specialist), Jeffrey Abrigo (Nurse), Cielo Aclon (Second

Purser), Jyoti Adhav (Second Purser), Celine Alma (Second Purser), Fiona Applebaum (Norwegian's Executive Assistant to the President and Chief Executive Officer), Dela Auguste (Group Service Coordinator/Access Officer), Brett Berman (Senior Director, Passenger & Crew Claims), Dianne Blazquez (Special Services Coordinator), Majore Brajic (Master), Avis Brown (Accessibility Coordinator), Sarah Brown (Director of Environmental Operations), Andre Bruce (Shore Excursion Manager), Andres Bustamante (Director, Commercial Development), Carlos Caballero (Environmental Officer), Joyce Caballero (Senior Director, Crew Medical), Alice Cain-Moore (Senior Director, Guest Relations), Marina Caparros (Group Service Coordinator/Access Officer), Niksa Carev (Navigation Officer), Cherish Carr (Coordinator, Destination Services Land Services), Love Castaño (Second Purser), Ricardo Ceballos (Director, Shipboard Security), Amit Chandola (Security Officer), Ivan Conev (Navigator), Barbie Contreras-Mejia (Second Purser), Javier Cortes (First Purser), Knellwyn Cuello (Nurse), Ashley De Souza (Chief Purser), Janina Decke (Executive Concierge), Cheryl Ann de la Torre (Hotel Controller), Marcel Denis (Guest Relations Coordinator, Lost & Found), Richard Desalesa (First Officer Navigation), Jean-Michel Dhélin (General Manager), Amanda Diaz (Supervisor, Support Services), Adriana Dillon (Visa, Health, and Port Requirements), Buppachat Donkrathoke (Nurse), Jean Carlos Downer (First Officer, Navigation), Vladyslav Dzhedzhora (Environmental Officer), Edna Violet Echeverri (Doctor), Ray Espina (Guest Services Manager), Olga Fernandez (Supervisor, Air/Sea), Carmela Ferrer-Cuachon (Guest Service Assistant Manager), Tamantha Fortune (Crew Purser), Ileana Fraga (Director, Destination & Land Services), Helen Gamulo (Guest Services Manager), Jonathan James Gardner (Senior Manager of Port Operations), Anthony Garnier (Care Team Specialist), Emil Georgiev (Navigator), Christakis Georgiou (Senior Doctor), Salvatore Giunta (Second Officer),

Carlos Gonzales (Chief Medical Officer), Ivo Gruja (Environmental Officer), Arturo Guerrero (Vice President Hotel Operations & Newbuild Delivery), Asen Gyurov (Staff Captain), Jason Habana (First Officer Navigation), Conny Hammelmann (Executive Concierge), Bjorn Ove Hansen (Former Vice President of Nautical and Port Operations; Current Vice President of Nautical Operations), Lars Alexander Helms (Chief Purser), Tatiana Hernandez (Director, Hotel Operations), Davor Ilijic (Staff Captain/SSO), Alan R. Imms (Environmental Officer), Earlene Johnson (Reservations Help Desk Coordinator), Ray-an Juan (Guest Service Assistant Manager/ECO), Zeljko Jurac (Captain), Ivaylo Kalicov (Navigator), Biki Kameni (Second Purser), Mark Kansley (Senior Vice President, Hotel Operations), Amaresh Kirtikar (Hotel Controller), Vjeko Knezevic (Navigator), LEEANATHA KRANSINGH (Nurse), Mary Kucera (Vice President, Air Services), Shaunte Lafond (Manager Group Administration), Ruth Larrodee (Nurse), Roman Lavrinovich (Senior Director, Port Services), Francisco Lazo De La Vega (Supervisor Guest Relations), Maria Lecuona (Air/Sea Agent), Jackie Lee (Director, Treasury), Michael E. Lewis (Reservations Help Desk Specialist), Robin Lindsay (Executive Vice President, Vessel Operations), Michelle Lopez (Accessibility Coordinator), Odie Lopez (Guest Service Manager), Klaus Lugmaier (Regional Vice President, Fleet Hotel Operations), Leo Lujak (Staff Captain), Ville Makela (First Officer, Navigation), Viviana Mantilla (Assignment Specialist), Attila Maradi (Environmental Officer), Andre Martin (First Officer, Navigation), Armando Martinez (Personnel Manager), Bogdan Mazuruk (Doctor), Morgan McCall (Regulatory Compliance & Sustainability Senior Manager), Paolo Mele (Senior Vice President Technical Operations), Tonya Meyer (Director, Air Services), Ana Michael (Guest Relations Coordinator II), Ivan Milos (Environmental Officer), Florin Mircea (Environmental Officer), James Mitchell (Vice President Marine HSEM), Francisco Molina (Special Events), Roland

Moonsamy (Destination Service Manager), Susie Moss (Turnaround Coordinator), Karl Muhlberger (Vice President, Shipboard Operations), Anil Nallari (Security Officer), Petar Nenov (Environmental Officer), Stefano Neri (Navigator), Fabricio Nieto (Guest Relations Coordinator, Lost & Found), Marco Nocera (Staff Captain), Carlo Paiella (Vice President, Technical Operations), Jose Palacio (Guest Relations Coordinator II), Goran Pamukovic (Environmental Officer), Felice Patruno (Captain/Master), Dianne Paulsen (Chief Purser), Danijela Pavleka (Nurse), Edouard Petitson (Port Captain, Director), Andriea Pollard (Guest Relations Coordinator), Paula Ponder (Manager Guest Relations), Louise Proctor (Director, Port Accounting), Erica Rita Radojicic (Executive Concierge), Kamen Radomirov (Environmental Officer), Eunices A. Ramos (Senior Medical Claims Specialist), Dennis Reddy (Itinerary Planning Director), Carmen Rencurrell (Manager Help Desk Compliance), Ernesto Reyes (Chief Purser), Tara Robertson (Supervisor, Guest Relations), Eduardo Rodriguez Vega (Second Purser), Jorge Rodriguez (Senior Director Medical), Vanessa Rodriguez (Senior Port Services Analyst), Elizabeth A. Rusell (Second Purser), Josephine Sacdalan Solon (Nurse), Stephanie Salazar (Port Guest Services Specialist), Paulino Sanchez (Chief Officer), Catharina Sandu (Second Purser), Amadis Saraceno (Navigational Officer), Lloyd Seguerra (Second Purser), Michael Shoemaker (Port Services Analyst), Tony Sierra (Navigational Officer), Parle Silic (Staff Captain), Vitaliy Silvachynsky (Master), Florentina Soltan (Nurse), Luksa Stanisic (Staff Captain), Regla Suarez (Port Services Analyst), Eric Suezo (Guest Service Assistant Manager/ECO), Trevor Swart (Guest Service Manager), Mark Alvin Tan (Senior Doctor), Elizabeth Tauben (Director, Port Guest Services), Nidia Torres (Environmental Officer), Jennifer Valdes (Supervisor Accounts Payable), Patricia Van Zweeden (Chief Purser), Boyan Vasilev (Environmental Officer), Luca Vecchione (Technical Superintendent Director), Ana Vidojevic

(Crew Purser), Ariana Villavicencio (Crew Purser), Ryan Vogt (Senior Director Consumer Sales), Michelle Williams-Inman (Claims Representative), Eric Wolff (Senior Manager Recycling & Waste Management), Emily Yee (Second Purser), Anca Zamfir (Second Purser), Ludmila Zelkin (Manager Shipboard Administrative Operations), Linda Ziedina (Personnel Manager), and Stjepan Zuzic (Staff Captain).

INTERROGATORY NO. 9:

9. Identify all NCL employees who have communicated with the Cuban Government concerning NCL's use of the Subject Property, and the dates of such communications.

RESPONSE TO INTERROGATORY NO. 9:

Norwegian objects to this Interrogatory as overbroad, unduly burdensome, and oppressive in that it seeks the identity of "all" Norwegian employees who have had any communication with the Cuban Government. Norwegian does not track every conversation every one of its employees has and has no practical or proportional way to search for such information. Additionally, Norwegian objects to the definition of the "Cuban Government" as overbroad.

Subject to and without waiving the foregoing objections, and to the best of its current knowledge, Norwegian responds as follows: Frank Del Rio (Norwegian's President and Chief Executive Officer), Lincoln M. Vidal (Norwegian's Vice President and Assistant General Counsel), Steve Moeller (Norwegian's Senior Vice President of Commercial Development), Luigi Razeto (Norwegian's Senior Vice President of Marine Operations), Edel Cruz (Norwegian's Vice President of Strategic Planning), Christine Manjencic (Norwegian's Vice President of Destination Services), Howard Sherman (Norwegian's Executive Vice President of Onboard Revenue and Destination Services), Mario Parodi (Norwegian's Vice President of Port

and Itinerary Planning), Louis Ruiz (Norwegian's Senior Director of Port Operations), Jennifer Marmanillo (Norwegian's Director of Itinerary Planning), Danilo Abeleda (Second Purser), Melissa Abrahams (Assignment Specialist), Jeffrey Abrigo (Nurse), Cielo Aclon (Second Purser), Jyoti Adhav (Second Purser), Celine Alma (Second Purser), Fiona Applebaum (Norwegian's Executive Assistant to the President and Chief Executive Officer), Dela Auguste (Group Service Coordinator/Access Officer), Brett Berman (Senior Director, Passenger & Crew Claims), Dianne Blazquez (Special Services Coordinator), Majore Brajic (Master), Avis Brown (Accessibility Coordinator), Sarah Brown (Director of Environmental Operations), Andre Bruce (Shore Excursion Manager), Andres Bustamante (Director, Commercial Development), Carlos Caballero (Environmental Officer), Joyce Caballero (Senior Director, Crew Medical), Alice Cain-Moore (Senior Director, Guest Relations), Marina Caparros (Group Service Coordinator/Access Officer), Niksa Carev (Navigation Officer), Cherish Carr (Coordinator, Destination Services Land Services), Love Castaño (Second Purser), Ricardo Ceballos (Director, Shipboard Security), Amit Chandola (Security Officer), Ivan Conev (Navigator), Barbie Contreras-Mejia (Second Purser), Javier Cortes (First Purser), Knellwyn Cuello (Nurse), Ashley De Souza (Chief Purser), Janina Decke (Executive Concierge), Cheryl Ann de la Torre (Hotel Controller), Marcel Denis (Guest Relations Coordinator, Lost & Found), Richard Desalesa (First Officer Navigation), Jean-Michel Dhélin (General Manager), Amanda Diaz (Supervisor, Support Services), Adriana Dillon (Visa, Health, and Port Requirements), Buppachat Donkrathoke (Nurse), Jean Carlos Downer (First Officer, Navigation), Vladyslav Dzhedzhora (Environmental Officer), Edna Violet Echeverri (Doctor), Ray Espina (Guest Services Manager), Olga Fernandez (Supervisor, Air/Sea), Carmela Ferrer-Cuachon (Guest Service Assistant Manager), Tamantha Fortune (Crew Purser), Ileana Fraga (Director,

Destination & Land Services), Helen Gamulo (Guest Services Manager), Jonathan James Gardner (Senior Manager of Port Operations), Anthony Garnier (Care Team Specialist), Emil Georgiev (Navigator), Christakis Georgiou (Senior Doctor), Salvatore Giunta (Second Officer), Carlos Gonzales (Chief Medical Officer), Ivo Gruja (Environmental Officer), Arturo Guerrero (Vice President Hotel Operations & Newbuild Delivery), Asen Gyurov (Staff Captain), Jason Habana (First Officer Navigation), Conny Hammelmann (Executive Concierge), Bjorn Ove Hansen (Former Vice President of Nautical and Port Operations; Current Vice President of Nautical Operations), Lars Alexander Helms (Chief Purser), Tatiana Hernandez (Director, Hotel Operations), Davor Ilijic (Staff Captain/SSO), Alan R. Imms (Environmental Officer), Earlene Johnson (Reservations Help Desk Coordinator), Ray-an Juan (Guest Service Assistant Manager/ECO), Zeljko Jurac (Captain), Ivaylo Kalicov (Navigator), Biki Kameni (Second Purser), Mark Kansley (Senior Vice President, Hotel Operations), Amaresh Kirtikar (Hotel Controller), Vjeko Knezevic (Navigator), LEEANATHA KRANSINGH (Nurse), Mary Kucera (Vice President, Air Services), Shaunte Lafond (Manager Group Administration), Ruth Larrodee (Nurse), Roman Lavrinovich (Senior Director, Port Services), Francisco Lazo De La Vega (Supervisor Guest Relations), Maria Lecuona (Air/Sea Agent), Jackie Lee (Director, Treasury), Michael E. Lewis (Reservations Help Desk Specialist), Robin Lindsay (Executive Vice President, Vessel Operations), Michelle Lopez (Accessibility Coordinator), Odie Lopez (Guest Service Manager), Klaus Lugmaier (Regional Vice President, Fleet Hotel Operations), Leo Lujak (Staff Captain), Ville Makela (First Officer, Navigation), Viviana Mantilla (Assignment Specialist), Attila Maradi (Environmental Officer), Andre Martin (First Officer, Navigation), Armando Martinez (Personnel Manager), Bogdan Mazuruk (Doctor), Morgan McCall (Regulatory Compliance & Sustainability Senior Manager), Paolo Mele (Senior Vice President

Technical Operations), Tonya Meyer (Director, Air Services), Ana Michael (Guest Relations Coordinator II), Ivan Milos (Environmental Officer), Florin Mircea (Environmental Officer), James Mitchell (Vice President Marine HSEM), Francisco Molina (Special Events), Roland Moonsamy (Destination Service Manager), Susie Moss (Turnaround Coordinator), Karl Muhlberger (Vice President, Shipboard Operations), Anil Nallari (Security Officer), Petar Nenov (Environmental Officer), Stefano Neri (Navigator), Fabricio Nieto (Guest Relations Coordinator, Lost & Found), Marco Nocera (Staff Captain), Carlo Paiella (Vice President, Technical Operations), Jose Palacio (Guest Relations Coordinator II), Goran Pamukovic (Environmental Officer), Felice Patruno (Captain/Master), Dianne Paulsen (Chief Purser), Danijela Pavleka (Nurse), Edouard Petitson (Port Captain, Director), Andriea Pollard (Guest Relations Coordinator), Paula Ponder (Manager Guest Relations), Louise Proctor (Director, Port Accounting), Erica Rita Radojicic (Executive Concierge), Kamen Radomirov (Environmental Officer), Eunices A. Ramos (Senior Medical Claims Specialist), Dennis Reddy (Itinerary Planning Director), Carmen Rencurrell (Manager Help Desk Compliance), Ernesto Reyes (Chief Purser), Tara Robertson (Supervisor, Guest Relations), Eduardo Rodriguez Vega (Second Purser), Jorge Rodriguez (Senior Director Medical), Vanessa Rodriguez (Senior Port Services Analyst), Elizabeth A. Rusell (Second Purser), Josephine Sacdalan Solon (Nurse), Stephanie Salazar (Port Guest Services Specialist), Paulino Sanchez (Chief Officer), Catharina Sandu (Second Purser), Amadis Saraceno (Navigational Officer), Lloyd Seguerra (Second Purser), Michael Shoemaker (Port Services Analyst), Tony Sierra (Navigational Officer), Parle Silic (Staff Captain), Vitaliy Silvachynsky (Master), Florentina Soltan (Nurse), Luksa Stanistic (Staff Captain), Regla Suarez (Port Services Analyst), Eric Suezo (Guest Service Assistant Manager/ECO), Trevor Swart (Guest Service Manager), Mark Alvin Tan (Senior Doctor),

Elizabeth Tauben (Director, Port Guest Services), Nidia Torres (Environmental Officer), Jennifer Valdes (Supervisor Accounts Payable), Patricia Van Zweeden (Chief Purser), Boyan Vasilev (Environmental Officer), Luca Vecchione (Technical Superintendent Director), Ana Vidojevic (Crew Purser), Ariana Villavicencio (Crew Purser), Ryan Vogt (Senior Director Consumer Sales), Michelle Williams-Inman (Claims Representative), Eric Wolff (Senior Manager Recycling & Waste Management), Emily Yee (Second Purser), Anca Zamfir (Second Purser), Ludmila Zelkin (Manager Shipboard Administrative Operations), Linda Ziedina (Personnel Manager), and Stjepan Zuzic (Staff Captain).

INTERROGATORY NO. 10:

10. Identify all NCL employees responsible for maintaining the records required by the United States Government to comply with any license or authorization concerning carrier services to Cuba, and describe their duties.

RESPONSE TO INTERROGATORY NO. 10:

Norwegian objects to this Interrogatory as overbroad and unduly burdensome in that it seeks the identity of “all” Norwegian employees responsible for maintaining the records required by the United States Government without providing any limiting principles.

Subject to and without waiving the foregoing objections, Norwegian has attempted to identify each employee responsible for maintaining such records at the corporate decision-making level. To the best of its current knowledge, Norwegian responds as follows: Vivian Ewart (Senior Vice President of Passenger Services, Norwegian Cruise Line), Carlos Ortega (Vice President of Guest Services, Oceania Cruises), and Patricia Scheer (Vice President of Passenger Services, Regent Seven Seas Cruises).

INTERROGATORY NO. 11:

11. Identify all the different ways in which NCL has used the Subject Property.

RESPONSE TO INTERROGATORY NO. 11:

Norwegian embarked and disembarked passengers on the only port in Havana designated by Cuba for passengers to embark and disembark lawfully because it exclusively houses medical screening, immigration, and customs.

INTERROGATORY NO. 12:

12. Identify all locations, including potential anchor sites offshore, for possible use as an alternative to the Subject Property in connection with cruises to Havana, Cuba, or the surrounding area, known to NCL, whether or not NCL considered any such location to dock its ships.

RESPONSE TO INTERROGATORY NO. 12:

Norwegian objects to this Interrogatory because the terms “potential” and “possible” are so vague and ambiguous that they are potentially limitless in scope. Norwegian also objects to this Interrogatory as overbroad and unduly burdensome to the extent it seeks the identification of “all locations” “whether or not” such locations were considered. Norwegian further objects to this Interrogatory, as its calls for speculation.

Subject to and without waiving the foregoing objections, Norwegian responds that there were no feasible alternatives to using the Subject Property for embarking and disembarking passengers in the port of Havana because it was the only area in Havana designated by Cuba for passengers to embark and disembark lawfully because it exclusively houses medical screening, immigration, and customs.

INTERROGATORY NO. 13:

13. Identify any persons that, to NCL’s knowledge, are managing or operating the Subject Property other than the Cuban Government.

RESPONSE TO INTERROGATORY NO. 13:

Norwegian objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects. Additionally, Norwegian objects to the definition of the “Cuban Government” as overbroad.

Subject to and without waiving the foregoing objections, Norwegian responds that it is not aware of any persons, other than the Cuban Government, that are managing or operating the Subject Property.

INTERROGATORY NO. 14:

14. Identify all employees of the Cuban Government with whom NCL communicated concerning NCL providing carrier services to Cuba, including the use of the Subject Property, and the dates of such communications.

RESPONSE TO INTERROGATORY NO. 14:

Norwegian objects to this Interrogatory as overbroad and unduly burdensome in that it seeks the identity of “all” Cuban employees who have had any communication with Norwegian. Norwegian does not track every conversation every one of its employees has and has no practical or proportional way to search for such information. Norwegian also objects to this Interrogatory in that it seeks information concerning carrier services to “Cuba,” without regard to the property at issue – the Subject Property. Norwegian further objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects. Additionally, Norwegian objects to the definition of the “Cuban Government” as overbroad.

Subject to and without waiving the foregoing objections, and to the best of its current knowledge, Norwegian responds as follows: José Ramón Cabañas Rodríguez (Cuba's Ambassador to the United States), Amaury Álvarez González (Administrador Agencia Habana, Servimar), Ariel Hernández Hernández (Primer Secretario del Departamento Asuntos Políticos y Económicos, Dirección General de Estados Unidos del MINREX), Armando Vilar (Especialista Marítimo, Havanatur S.A.), Beatriz Sanchez, Doris Alonso Vega, Eduardo Meirelles Casaña, Eller Ramirez Marrero (Vicepresidente, Aries S.A.), Eugenio Silva Guia, Eva Raquel Alonso Pérez, Figuero Fernandez, Haydee C. Beltrán Estrada, Hernandez Suarez, Idalma Álvarez Izquierdo, Ignacio Aguirre, Irlen Garcia, Isabel Díaz, Ismaray Cisneros Martínez, Ivan Barroso Acosta, Iván Ricardo Chacón, Jessica Pérez, Jorgelius Perdomo, Jose Elio Betancourt Perez (Agent), José Manuel Bisbé York (President, Havanatur S.A.), Juan Carlos Zaballa Vidal, Norberto Pérez del Toro (Director de Operaciones y Comercial, Aries, S.A.), Sade Álvarez Miranda (Especialista Dirección Comercial, Havanatur S.A.), Yamila Fojaco Alonso (Agent, Mambisa Cienfuegos Agency), Yomar Moya Glez (Havana Port Agent), Alejandro Padrón Corral (Cónsul General, Embassy of the Republic of Cuba), Rubén Rojas Rodríguez (Agente de Buques, Agencia Habana, Servimar), Evelyn Guilarte (Directora General and Directora Adjunta, Havanatur S.A.), Susana Miyares Ramos (Subdirectora Económica), José L. Perdigón Ramírez (Presidente Ejecutivo, Aries S.A.), Liuberts Rodríguez Ortega (Agent, Havana Servimar Agency), Gustavo Machin (Sub Director General Dirección General, EEUU MINREX), Mauricio Pérez (Account Manager Turismo Especializado, Havanatur S.A.), Ivette Diez Iglesias (Jefa Departamento Turismo Especializado), Msc. Warnel Lores Mora (Primer Secretario, Dirección General de Estados Unidos, J' Dpto. Asuntos Políticos y Económicos), Josefina F. Vidal (Directora General Dirección General, EEUU MINREX), Maritza Boan Álvarez

(Abogada, Aries S.A.), Angel Díaz Albertini Alonso (Presidente/Gerente General, Aries S.A.), Johana Tablada de la Torre (Subdirectora General de Estados Unidos del MINREX), Jorge Mandiola Bustos (Director General La Habana Terminal de Cruceros, Aries S.A.), Jose Fresco Benaim (Operations Director for La Habana Cruise Port, Aries S.A.), Marjorie Tredis, Odalys Alvarez Dominguez (Esp Comercial, Aries S.A.), Pablo Alberto Díaz Galindo (Consejero del Departamento Asuntos Políticos y Económicos, Dirección General de Estados Unidos del MINREX), Massiel Obregón González (Esp. Operaciones-Comercial, Aries S.A.), Mario Corominas (Vicepresidente, Aries S.A.), Manuel Marrero Cruz (Ministerio de Turismo de Cuba), Rodrigo Malmierca (Ministro de Comercio Exterior de Cuba), Bruno Rodríguez Parrilla (Ministro de Relaciones Exteriores de Cuba), Mercedes Pérez Newhall (Directora de la Empresa Consignataria Mambisa), and Eduardo Noa (Operations Manager, Consignataria Mambisa Agency, Santiago de Cuba).

INTERROGATORY NO. 15:

15. Identify the NCL employees that accompanied the NCL guests on the shore excursions to Havana, Cuba, and its surrounding areas.

RESPONSE TO INTERROGATORY NO. 15:

Norwegian objects to this Interrogatory as overbroad, unduly burdensome, and vague in that it seeks the identity of “the” Norwegian employees who accompanied Norwegian guests on shore excursions, without providing any limiting principles or details about which types of employees the Interrogatory seeks. Norwegian further objects to this Interrogatory as overbroad and disproportional to the needs of the case in that it seeks information unrelated to whether Norwegian trafficked in the Subject Property or whether Norwegian’s use of the Subject Property was lawful. Norwegian objects to this Interrogatory because the terms “accompanied”

and “surrounding areas” are so vague and ambiguous that they are potentially limitless in scope. Norwegian further objects to the Interrogatory as vague and overbroad in that it uses the term “the shore excursions,” without specifying which shore excursions it relates to or even whether Norwegian had control over those excursions. Norwegian also objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects.

Subject to and without waiving the foregoing objections, Norwegian answers as follows: MN Norwegian Sky (Carlos Romero, OFAC Compliance Officer; Camille Rauscher, OFAC Compliance Officer; Mary Motamedi, OFAC Compliance Officer; Gabrielle Turner, OFAC Compliance Officer; Stephanie Davidson, OFAC Compliance Officer); MN Insignia (Christine Manjencic, Norwegian’s Vice President of Destination Services; Carrie Weems, Norwegian’s Destination Services, Shore Excursions Regional Manager; Sophia Kider, OFAC Compliance Officer; Corey Powell, OFAC Compliance Officer); MN Regatta (Christine Manjencic, Norwegian’s Vice President of Destination Services; Luis Cadenas, Norwegian’s Senior Director of Pre and Post Hotel Programing; Vanessa Heredia, Norwegian’s Manager of Destinations, Groups, Charters, and Incentives; Lisa Jeanne Peterson, OFAC Compliance Officer; Anthony Milfelt, OFAC Compliance Officer; Chris Hammer, OFAC Compliance Officer; Ray Carr, OFAC Compliance Officer; Hannah Hesseltine, OFAC Compliance Officer); MN Sirena (Philip Barrood, OFAC Compliance Officer; Hannah Hesseltine, OFAC Compliance Officer; Christina Hill, OFAC Compliance Officer; Ian Lah, OFAC Compliance Officer; Cole Miller, OFAC Compliance Officer; Jini Scoville, OFAC Compliance Officer; Alexis Soto Jr., OFAC Compliance Officer; Emily Viancourt, OFAC Compliance Officer; Chase Wolfe, OFAC

Compliance Officer); MN Norwegian Sun (Camille Rauscher, OFAC Compliance Officer; Mary Motamedi, OFAC Compliance Officer); MN Seven Seas Navigator (Luis Cadenas, Norwegian's Senior Director Pre and Post Hotel Programing); MN Seven Seas Mariner (Carrie Weems, Norwegian's Destination Services, Shore Excursions Regional Manager); MN Seven Seas Voyager (Carrie Weems, Norwegian's Destination Services, Shore Excursions Regional Manager; Andy Heath, OFAC Compliance Officer); and MN Riviera (Christine Manjencic, Norwegian's Vice President of Destination Services; Alexis Saroukos, OFAC Compliance Officer; Brittany Howk, OFAC Compliance Officer; Kelsey Schroeder, OFAC Compliance Officer; Cameron Morgan, OFAC Compliance Officer; Robert Tait, OFAC Compliance Officer; Micah Ndiba, OFAC Compliance Officer; Xavier Perkins, OFAC Compliance Officer).

INTERROGATORY NO. 16:

16. Identify all persons that have made any loan, any extension of credit, or any financing from which any of the proceeds were used by NCL to make any payments to the Cuban Government.

RESPONSE TO INTERROGATORY NO. 16:

Norwegian objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are "discrete subparts" because they seek information about separate subjects. Additionally, Norwegian objects to the definition of the "Cuban Government" as overbroad. Subject to and without waiving the foregoing objections, after conducting a reasonable investigation, Norwegian responds that it is not aware of any such persons.

INTERROGATORY NO. 17:

17. Identify all persons that have made any loan, any extension of credit, or any financing from which any of the proceeds were used by NCL to fund any portion of NCL's cost for the use of the Subject Property.

RESPONSE TO INTERROGATORY NO. 17:

Norwegian objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects. Subject to and without waiver of the foregoing objections, after conducting a reasonable investigation, Norwegian responds that it is not aware of any such persons.

INTERROGATORY NO. 18:

18. Identify all persons that have made any loan, any extension of credit, or any financing from which any of the proceeds were used by NCL to make any payments to, directly or indirectly, related to any construction on, or any improvements to, the Subject Property.

RESPONSE TO INTERROGATORY NO. 18:

Norwegian objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects. Subject to and without waiving the foregoing objections, after conducting a reasonable investigation, Norwegian responds that it is not aware of any such persons.

INTERROGATORY NO. 19:

19. Identify all persons that have made any loan, any extension of credit, or any financing from which any of the proceeds were used by NCL to make any payments, directly or indirectly, to Global Ports Holdings related to the Subject Property or any other port facility in Cuba.

RESPONSE TO INTERROGATORY NO. 19:

Norwegian objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as

the previous joining questions are “discrete subparts” because they seek information about separate subjects.

Norwegian also objects to this Interrogatory because it is unduly burdensome and oppressive to the extent it seeks information concerning “any other port facility” beyond the Subject Property in Cuba. Norwegian further objects to this Interrogatory because (1) it is not relevant, material, or necessary to this action because this information is not relevant to any claim or defense in this action, nor is it relevant to Plaintiff’s alleged damages, and (2) it seeks or calls for information “related to the Subject Property or any other port facility in Cuba” that is potentially unlimited in time and scope, and thus, it is not proportional to the needs of the case. Subject to and without waiving the foregoing objections, after conducting a reasonable investigation, Norwegian responds that it is not aware of any such persons.

INTERROGATORY NO. 20:

20. Identify any communications, transactions or dealings by NCL with Global Ports Holdings or China Communications Construction Company, Ltd. relating to the Subject Property.

RESPONSE TO INTERROGATORY NO. 20:

Norwegian also objects to this Interrogatory on the ground that it exceeds the permissible limit of 25 interrogatories without securing leave of Court or a stipulation from Norwegian, as the previous joining questions are “discrete subparts” because they seek information about separate subjects.

Norwegian objects to this Interrogatory because it is not relevant, material, or necessary to this action because (1) any communications, transactions, or dealings between Norwegian and Global Ports Holding or China Communications Construction Company, Ltd. is not relevant to any claim or defense in this action, nor is it relevant to Plaintiff’s alleged damages, and (2) it

seeks or calls for the information “relating to the Subject Property” that is potentially unlimited in time and scope, and thus, it is not proportional to the needs of the case. Norwegian further objects to this Interrogatory to the extent it seeks or calls for financial documents that would lead to the unwarranted disclosure and discussion of commercially sensitive non-public information about Norwegian.

OVERVIEW STATEMENT

1. The foregoing responses reflect Norwegian’s current knowledge, understanding, and belief respecting the matters about which inquiry has been made. Discovery has just begun in this matter, and therefore, without in any way obligating itself to do so, Norwegian reserves the right to amend, modify, supplement, clarify, or further explain these responses and objections.

2. By responding to these Interrogatories, Norwegian does not waive any rights to object to any further inquiry or any effort to compel responses beyond those provided.

3. By making a specific objection to a particular Interrogatory, Norwegian does not imply that the specific objection is not applicable in response to any other Interrogatory nor that the general objections are not applicable to that Interrogatory.

4. A statement that responsive information or documents will be produced should not be taken to mean that any such information or documents exist; rather, they will be produced only if they exist and can be located through a reasonable search of Norwegian’s records.

5. The foregoing responses are made solely for the purpose of and in relation to discovery conducted in this case. Each response is given subject to all appropriate objections (including but not limited to objections concerning relevancy, specificity, over breadth, undue burden, materiality, confidentiality, proprietary or trade secret material, customer information, or

inadmissibility), which would require the exclusion of any response contained herein. All such objections are, therefore, reserved and may be imposed at any time in the future, including at trial. No response to any portion of any Interrogatory shall be deemed a waiver of any objection set forth herein.

6. Except for facts explicitly admitted in these responses, no admission of any nature whatsoever is to be implied or inferred from these responses. The fact that Norwegian has responded to an Interrogatory should not be taken as an admission, or a concession of the existence, of any fact set forth or assumed by such Interrogatory or that such response constitutes evidence of any fact thus set forth or assumed.

7. The foregoing responses are without prejudice to Norwegian's rights to use or rely on, at any time, any information subsequently discovered or omitted from these responses as a result of mistake, error, oversight, or inadvertence. Norwegian further reserves the right to provide additional information and evidence at any time and to object on appropriate grounds to the introduction of any portion of these responses into evidence.

GENERAL OBJECTIONS

The following objections are incorporated into each specific response above as if fully repeated in each response and are intended, and shall be deemed, to be in addition to any specific objection. The production of any information in response to these Interrogatories and these objections and responses by Norwegian shall be without prejudice to any objections Norwegian may have to the competency, relevancy, or admissibility of any document or information at any hearing or trial and shall not be deemed a waiver of any such objections.

1. Norwegian objects to each Interrogatory, including the Definitions and Instructions, to the extent they attempt to impose burdens on Norwegian beyond what is required

by the Federal Rules of Civil Procedure, the Local Rules of the Southern District of Florida, any other applicable laws or rules, and/or what the parties have agreed to or will agree to regarding any electronically stored information protocol, protective order, privilege agreement, or expert stipulation. Unless otherwise stated, Norwegian is providing responses only on behalf of itself.

2. Norwegian objects to each Interrogatory to the extent it seeks information that is protected from discovery by the attorney-client privilege, the work-product doctrine, or any other applicable privilege, protection, or immunity. Norwegian hereby asserts such privileges and protections to the extent implicated by each Interrogatory and will exclude all privileged and protected information from its responses to the Interrogatories. Any disclosure of such protected or privileged information is inadvertent and is not intended to waive any privileges or protections. Fed. R. Civ. P. 26(b)(5)(B); Fed. R. Evid. 502(b). Plaintiff must not use such information for any purpose until further order of the Court.

3. Norwegian objects to each Interrogatory as overly burdensome and seeking information not proportional to the needs of the case because the Interrogatories are not time limited. Seeking information of an infinite duration is not proportional to the needs of the case because the only acts Plaintiff alleges that Norwegian engaged in occurred in and after 2017. Accordingly, unless otherwise stated, Norwegian has limited its responses to the time period from March 1, 2016 through July 1, 2019, which includes a reasonable time period before and after which Norwegian is alleged to have violated any statute.

4. Norwegian objects to each Interrogatory that seeks confidential and sensitive personal identification material relating to Norwegian's guests or confidential, proprietary, or trade secret material from Norwegian, including Norwegian's internal, confidential cost and pricing materials. Norwegian will not provide responses regarding any confidential and sensitive

personal identification material until the parties agree on, or the Court enters, an appropriate confidentiality order.

5. Norwegian objects to the definition of “NCL” and “Person” as overbroad, unduly burdensome, and ambiguous to the extent they refer to unnamed, undefined “corporations, businesses, subsidiaries, divisions, subdivisions, committees, affiliates, predecessors, successors, and parents; and any current or former directors, officers, employees, agents, representatives or other persons acting or purporting to act, on behalf of the preceding entities” as well as undefined persons and legal entities. Unless otherwise stated, Norwegian has limited its responses to documents from the named defendant, Norwegian Cruise Line Holdings Ltd.

6. Norwegian objects to the definition of “Employee” as overbroad and unduly burdensome in that it includes all individuals acting on Norwegian’s behalf even if they were not Norwegian employees and therefore, seeks documents outside of Norwegian’s possession, custody, or control. Norwegian further objects to the definition as seeking attorney-client and work-product documents, as the definition includes Norwegian’s counsel. Unless otherwise stated, Norwegian will interpret the term employee to refer to individuals in a direct employment relationship with Norwegian.

7. Norwegian objects to each Interrogatory to the extent it purports to assume disputed facts or facts that are inaccurate, calls for or assumes legal conclusions, or is otherwise defective in form. Norwegian denies any such disputed or inaccurate facts or legal conclusions that are or may be assumed by an Interrogatory, Definition, or Instruction. Subject to and without waiving any objections, Norwegian’s responses are not intended to be admissions or legal conclusions and may not be construed as such.

8. Norwegian objects to each Interrogatory to the extent it prematurely calls for expert analysis and expert testimony and states that Norwegian will provide expert disclosures as provided by the Federal Rules of Civil Procedure, the Court's Scheduling Orders, and any applicable stipulations.

VERIFICATION

These answers and responses have been provided by:

NORWEGIAN CRUISE LINE
HOLDINGS LTD.,

Name: Lincoln M. Vidal

Title: Vice President & Assistant General Counsel

Signature: *Lincoln M. Vidal*

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

Before me, the undersigned authority duly authorized to administer oaths and take acknowledgements, PERSONALLY APPEARED, Lincoln M. Vidal, who is personally known to me ~~or who has produced~~ _____ as identification and who, upon first having been duly sworn, did depose and say that the answers and responses to the foregoing interrogatories propounded by Plaintiff are true and correct.

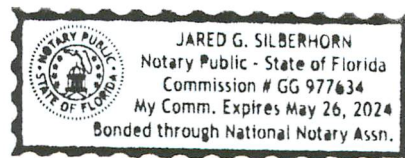
SWORN TO and subscribed this 12TH day of OCTOBER, 2020.

Jared G. Silberhorn
NOTARY PUBLIC

TYPED NAME: JARED G. SILBERHORN

COMMISSION EXPIRES: 5/26/24

COMMISSION NO.: GG 977634



Dated: October 12, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2020, the foregoing was served on the following counsel of record via electronic mail:

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By: /s/ Allen P. Pegg
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