

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

Case No.: 19-cv-22842-DPG

SUCESORES DE DON
CARLOS NUÑEZ Y
DOÑA PURA GALVEZ,
INC., d/b/a BANCO
NUÑEZ,

Plaintiff,

v.

SOCIÉTÉ GÉNÉRALE, S.A., d/b/a
SG AMERICAS, INC.; THE BANK OF
NOVA SCOTIA, d/b/a SCOTIA
HOLDINGS (US) INC., a/k/a THE BANK
OF NOVA SCOTIA, MIAMI AGENCY;
THE NATIONAL BANK OF CANADA,
d/b/a NATIONAL BANK OF CANADA
FINANCIAL GROUP, INC.; and BANCO
BILBAO VIZCAYA ARGENTARIA, S.A.,
d/b/a BBVA, USA.,

Defendants.

**DEFENDANT SOCIÉTÉ GÉNÉRALE, S.A.'S UNOPPOSED MOTION FOR LEAVE
TO EXCEED THE PAGE LIMITATION AS TO ITS REPLY IN
SUPPORT OF ITS MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Defendant Société Générale, S.A. ("SG") respectfully moves for leave to file a twenty-page reply ("Reply") in support of its motion to dismiss the Amended Complaint filed by Plaintiff on September 24, 2019 ("Amended Complaint") [DE 16]. SG's Reply would exceed, by 10 pages, the ten-page limit for replies permitted by Local Rule 7.1(c)(2). Good cause exists for the granting SG's request to file a twenty-page Reply, which is not opposed by the Plaintiff:

1. On July 10, 2019, Plaintiff filed the initial complaint in this matter, alleging that SG “trafficked” in Plaintiff’s expropriated property within the meaning of Title III of the Cuban Liberty and Democratic Solidarity Act, 22 U.S.C. § 6021, *et. seq.* (“Helms-Burton”). This complaint was subsequently amended on September 24, 2019 to, among others, add additional defendants (“Amended Complaint”).

2. SG has moved to dismiss the Amended Complaint on numerous grounds, including that the court lacks personal jurisdiction over SG, that plaintiff did not acquire ownership of its claim within the requisite time period, and that the Complaint fails to state a claim for several different reasons that implicate both U.S. and international law. [DE 29].

3. Plaintiff has filed its response brief, addressing these arguments, and raising a number of new assertions which must be addressed by SG in its reply brief, including the effect of purported jurisdiction under Fed. R. Civ. P. 4(k)(2), as well as other arguments relating to standing and the legal sufficiency of the claims against SG. To adequately address these issues, SG requires 10 additional pages for the Reply.

4. This request is not made with intent to delay and will not prejudice Plaintiff, as evidenced by their consent to the relief requested.

CONCLUSION

5. For the foregoing reasons, SG respectfully requests that the Court grant its *unopposed* motion for leave to file a twenty-page Reply in support of its Motion to Dismiss the Amended Complaint.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Counsel for SG has conferred with Plaintiff’s counsel, who do not oppose the relief requested herein.

Dated: January 7, 2020

Respectfully submitted,

REED SMITH LLP

By: /s/ Jose I. Astigarraga

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*Attorneys for Defendant Société Générale,
S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that the foregoing is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Jose I. Astigarraga
José I. Astigarraga