

**In the United States Court of Appeals  
for the Eleventh Circuit**

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No. 23-10171

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HAVANA DOCKS CORPORATION,

*Plaintiff – Appellee  
Cross Appellant*

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
NORWEGIAN CRUISE LINE HOLDINGS, LTD.,  
CARNIVAL CORPORATION,  
a foreign corporation doing business as  
Carnival Cruise Lines,  
MSC CRUISES S.A. Co.,  
MSC CRUISES (USA), INC., et al.,

*Defendants – Appellants  
Cross Appellees.*

**OPPOSITION TO MOTION FOR LEAVE TO FILE AMICUS  
BRIEF OF CRUISE LINES INTERNATIONAL ASSOCIATION**

*Havana Docks Corp. v. Royal Caribbean Cruises, Ltd., et al.*  
**AMENDED CERTIFICATE OF INTERESTED PERSONS**

Pursuant to Fed. R. App. P. 26.1 and 11th Cir. R. 26.1, Plaintiff-Appellee-Cross-Appellant Havana Docks Corporation hereby certifies that the following is a complete list of persons and entities having an interest in the outcome of these cases. Entries marked with an asterisk have been added or changed since Havana Docks' last filing.

1. 1972 Productions, Inc. Florida – Carnival Corporation Subsidiary
2. A.C.N. 098 290 834 Pty. Ltd. Australia – Carnival Corporation  
Subsidiary
3. A.J. Juneau Dock, LLC Alaska – Carnival Corporation Subsidiary
4. Admiral Management Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
5. Adventure Island Ltd. Bahamas – Carnival Corporation Subsidiary
6. Adventure of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
7. AIDA Kundencenter GmbH Germany – Carnival Corporation  
Subsidiary
8. AIDARadio GmbH Germany – Carnival Corporation Subsidiary

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9. Air-Sea Holiday GmbH Switzerland – Carnival Corporation  
Subsidiary
10. Akerman LLP – counsel for Carnival Corporation
11. Alaska Hotel Properties LLC Delaware – Carnival Corporation  
Subsidiary
12. Allure of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
13. American Society of Travel Advisors, Inc. – Amicus Curiae  
Supporting Defendants-Appellants
14. Anthem of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
15. Arrasas Limited Isle of Man – Norwegian Cruise Line Holdings, Ltd.  
Subsidiary
16. Baldrige, James D. – counsel for MSC Cruises S.A.
17. Balmori, Daniel – counsel for Norwegian Cruise Line Holdings, Ltd.
18. Barcelona Cruise Terminal SLU Spain – Carnival Corporation  
Subsidiary
19. Bash III, John F. – counsel for Norwegian Cruise Line Holdings, Ltd

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20. Bay Island Cruise Port, S.A. Honduras – Carnival Corporation  
Subsidiary
21. Behn, Aphra – shareholder of Havana Docks Corporation
22. Behn, Mickael – director of Havana Docks Corporation
23. Behn-Lucain, Melanie – shareholder of Havana Docks Corporation
24. Belize Cruise Terminal Limited Belize – Carnival Corporation  
Subsidiary
25. Belize Investments Limited St. Lucia – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
26. Belize Island Holdings Ltd. Belize – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
27. Bermuda Tenders, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
28. Black, Hillary S. – counsel for Carnival Corporation
29. Bloom, Honorable Beth – United States District Court Judge
30. Bluvacanze Spa Italy – MSC Cruises S.A. Subsidiary
31. Bohrer, Sanford L. – counsel for Royal Caribbean Cruises, Ltd.
32. Boies Schiller Flexner LLP – counsel for Carnival Corporation

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33. Bondi, Bradley J. – counsel for Amici Curiae U.S. Travel Association, United States Tour Operators Association, Inc., and the American Society of Travel Advisors, Inc. Supporting Defendants-Appellants
34. Breakaway Four, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
35. Breakaway One, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
36. Breakaway Three, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
37. Breakaway Two, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
38. Brilliance of the Seas Shipping Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
39. Buffett, Warren E. – shareholder of Havana Docks Corporation
40. Burck, William Anthony – counsel for Norwegian Cruise Line Holdings, Ltd.
41. Caluda, Nicholas John – counsel for Norwegian Cruise Line Holdings, Ltd.
42. Canodros CL Ecuador – Royal Caribbean Cruises Ltd. Subsidiary

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43. Carnival (UK) Limited UK – Carnival Corporation Subsidiary
44. Carnival Bahamas FC Limited Bahamas – Carnival Corporation Subsidiary
45. Carnival Bahamas Holdings Limited Bahamas – Carnival Corporation Subsidiary
46. Carnival Corporation (CCL) – Appellant
47. Carnival Corporation & plc Asia Pte. Ltd. Singapore – Carnival Corporation Subsidiary
48. Carnival Corporation Hong Kong Limited Hong Kong – Carnival Corporation Subsidiary
49. Carnival Corporation Korea Ltd. Korea – Carnival Corporation Subsidiary
50. Carnival Corporation Ports Group Japan KK Japan – Carnival Corporation Subsidiary
51. Carnival Finance, LLC Delaware – Carnival Corporation Subsidiary
52. Carnival Grand Bahama Investment Limited Bahamas – Carnival Corporation Subsidiary
53. Carnival Holdings (Bermuda) Limited Bermuda – Carnival Corporation Subsidiary

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54. Carnival Investments Limited Bahamas – Carnival Corporation  
Subsidiary
55. Carnival Japan, Inc. Japan – Carnival Corporation Subsidiary
56. Carnival License Holdings Limited Bahamas – Carnival Corporation  
Subsidiary
57. Carnival Maritime GmbH Germany – Carnival Corporation  
Subsidiary
58. Carnival North America LLC Florida – Carnival Corporation  
Subsidiary
59. Carnival PLC UK – Carnival Corporation Subsidiary
60. Carnival Port Holdings Limited UK – Carnival Corporation  
Subsidiary
61. Carnival Ports Inc. Florida – Carnival Corporation Subsidiary
62. Carnival Support Services India Private Limited India – Carnival  
Corporation Subsidiary
63. Carnival Technical Services (UK) Limited UK – Carnival Corporation  
Subsidiary
64. Carnival Technical Services Finland Limited Finland – Carnival  
Corporation Subsidiary

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65. Carnival Technical Services GmbH Germany – Carnival Corporation  
Subsidiary
66. Carnival Vanuatu Limited Vanuatu – Carnival Corporation  
Subsidiary
67. Casey, Stephanie A. – counsel for Havana Docks Corporation
68. CC U.S. Ventures, Inc. Delaware – Carnival Corporation Subsidiary
69. CCL Gifts, LLC Florida – Carnival Corporation Subsidiary
70. Celebrity Apex Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
71. Celebrity Cruise Lines Inc. Cayman Islands – Royal Caribbean  
Cruises Ltd. Subsidiary
72. Celebrity Cruises Holdings Inc. Liberia – Royal Caribbean Cruises  
Ltd. Subsidiary
73. Celebrity Cruises Inc., doing business as Celebrity Cruises Liberia –  
Royal Caribbean Cruises Ltd. Subsidiary
74. Celebrity Eclipse Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
75. Celebrity Edge Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary



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76. Celebrity Equinox Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
77. Celebrity Reflection Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
78. Celebrity Silhouette Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
79. Celebrity Solstice Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
80. Cisalpina Tours Spa Italy – MSC Cruises S.A. Subsidiary
81. Classic Cruises II, LLC Delaware – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
82. Classic Cruises, LLC Delaware – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
83. Clement & Murphy PLLC – counsel for Royal Caribbean Cruises,  
Ltd.
84. Clement, Paul D. – counsel for Royal Caribbean Cruises, Ltd.
85. CNS Compañía Naviera Seaside 1 SA Panama – MSC Cruises S.A.  
Subsidiary
86. Colson Hicks Eidson – counsel for Havana Docks Corporation

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87. Compañia Naviera Evo 1 SA Panama – MSC Cruises S.A. Subsidiary
88. Compañia Naviera Evo 2 SA Panama – MSC Cruises S.A. Subsidiary
89. Compañia Naviera Fantasia SA Panama – MSC Cruises S.A.  
Subsidiary
90. Compañia Naviera Meraviglia SA Panama – MSC Cruises S.A.  
Subsidiary
91. Compañia Naviera Musica SA Panama – MSC Cruises S.A.  
Subsidiary
92. Compañia Naviera Ocean Cay SA Panama – MSC Cruises S.A.  
Subsidiary
93. Compañia Naviera Orchestra SA Panama – MSC Cruises S.A.  
Subsidiary
94. Compañia Naviera Pacifica S.A. Panama – MSC Cruises S.A.  
Subsidiary
95. Compañia Naviera Preziosa SA Panama – MSC Cruises S.A.  
Subsidiary
96. Compañia Naviera Seaside 2 SA Panama – MSC Cruises S.A.  
Subsidiary

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97. Compañía Naviera Serenata SA Panama – MSC Cruises S.A.

Subsidiary

98. Compañía Naviera Vista 1 SA Panama – MSC Cruises S.A.

Subsidiary

99. Compañía Naviera Vista 2 SA Panama – MSC Cruises S.A.

Subsidiary

100. Compañía Naviera Vista 3 SA Panama – MSC Cruises S.A.

Subsidiary

101. Compañía Naviera Vista 4 SA Panama – MSC Cruises S.A.

Subsidiary

102. Compañía Naviera Vista 5 SA Panama – MSC Cruises S.A.

Subsidiary

103. Compañía Naviera World Class 1 SA Panama – MSC Cruises S.A.

Subsidiary

104. Compañía Naviera World Class 2 SA Panama – MSC Cruises S.A.

Subsidiary

105. Compañía Naviera World Class 3 SA Panama – MSC Cruises S.A.

Subsidiary

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106. Compañía Naviera World Class 4 SA Panama – MSC Cruises S.A.

Subsidiary

107. Compañía Naviera Yc1 SA Panama – MSC Cruises S.A. Subsidiary

108. Compañía Naviera Yc2 SA Panama – MSC Cruises S.A. Subsidiary

109. Compañía Naviera Yc3 SA Panama – MSC Cruises S.A. Subsidiary

110. Compañía Naviera Yc4 SA Panama – MSC Cruises S.A. Subsidiary

111. Compañía Naviera Yc5 SA Panama – MSC Cruises S.A. Subsidiary

112. Compañía Naviera Yc6 SA Panama – MSC Cruises S.A. Subsidiary

113. Constellation Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary

114. Cooke, Honorable Marcia G. – United States District Judge

115. Cooper, Jonathan Gordon – counsel for Norwegian Cruise Line

Holdings, Ltd

116. Costa Crociere PTE Ltd. Singapore – Carnival Corporation

Subsidiary

117. Costa Crociere S.p.A. Italy – Carnival Corporation Subsidiary

118. Costa Cruceros S.A. Argentina – Carnival Corporation Subsidiary

119. Costa Cruise Lines Inc. Florida – Carnival Corporation Subsidiary

120. Costa Cruise Lines UK Limited UK – Carnival Corporation

Subsidiary

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121. Costa Cruises Customer Center S.L.U. Spain – Carnival Corporation  
Subsidiary
122. Costa Cruises Shipping Services (Shanghai) Company Limited China  
– Carnival Corporation Subsidiary
123. Costa Cruises Travel Agency (Shanghai) Co., Ltd. China – Carnival  
Corporation Subsidiary
124. Costa Cruises Turkey Turizm Gelisim A.S. Turkey – Carnival  
Corporation Subsidiary
125. Costa Cruzeiros Agencia Maritima e Turismo Ltda. Brazil – Carnival  
Corporation Subsidiary
126. Costa International B.V. Netherlands – Carnival Corporation  
Subsidiary
127. Costa Kreuzfahrten GmbH Switzerland – Carnival Corporation  
Subsidiary
128. Cozumel Cruise Terminal S.A. de C.V. Mexico – Carnival Corporation  
Subsidiary
129. Cruise Administration Services, Inc. Philippines – Carnival  
Corporation Subsidiary

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130. Cruise Conglomerate Maritime Ltd Guernsey – MSC Cruises S.A.  
Subsidiary
131. Cruise Lines International Association – Amicus Curiae Supporting  
Defendants-Appellants
132. Cruise Quality Travel Spain SL Spain – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
133. Cruise Ships Catering & Services International N.V. Curacao –  
Carnival Corporation Subsidiary
134. Cruise Terminal Services, S.A. de C.V. Mexico – Carnival  
Corporation Subsidiary
135. Cruiseport Curacao C.V. Curacao – Carnival Corporation Subsidiary
136. CSMART Real Estate B.V. Netherlands – Carnival Corporation  
Subsidiary
137. CSMART Real Estate C.V. Netherlands – Carnival Corporation  
Subsidiary
138. D.R. Cruise Port, Ltd. Bahamas – Carnival Corporation Subsidiary
139. Dvoretzky, Shay – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants-Appellants
140. Elayan-Martinez, Aziza F. – counsel for Havana Docks Corporation

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141. Ellis George Cipollone O'Brien Annaguey LLP – counsel for Havana Docks Corporation
142. Enchantment of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
143. Eurosoft Corporation Limited United Kingdom – Norwegian Cruise Line Holdings, Ltd. Subsidiary
144. Eurosoft Cruise Line (Shanghai) Co., Ltd. China – Norwegian Cruise Line Holdings, Ltd. Subsidiary
145. Explora SA Switzerland – MSC Cruises S.A. Subsidiary
146. Explorer II New Build, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
147. Explorer III New Build, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
148. Explorer New Build, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
149. Explorer of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
150. F.P.M. SAS French Polynesia – Carnival Corporation Subsidiary
151. F.P.P. SAS French Polynesia – Carnival Corporation Subsidiary

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152. Fields, Lazaro – counsel for Havana Docks Corporation
153. Fleet Maritime Services (Bermuda) Limited Bermuda – Carnival Corporation Subsidiary
154. Fleet Maritime Services Holdings (Bermuda) Limited Bermuda – Carnival Corporation Subsidiary
155. Fleet Maritime Services International Limited Bermuda – Carnival Corporation Subsidiary
156. Foreman Friedman, PA – counsel for Amicus Curiae Cruise Lines International Association Supporting Defendants in the District Court
157. Fowler III, George J. – counsel for Carnival Corporation
158. Freedom of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
159. Freyre, Pedro A. – counsel for Carnival Corporation
160. Friedman, Darren Wayne – Counsel for Amicus Curiae Cruise Lines International Association Supporting Defendants in the District Court
161. Future Investments, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary



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162. Gayles, Honorable Darrin P. – United States District Court Judge
163. GG Operations Inc. Delaware – Royal Caribbean Cruises Ltd.  
Subsidiary
164. Gibs, Inc. Delaware – Carnival Corporation Subsidiary
165. Global Experience Innovators, Inc. Florida – Carnival Corporation  
Subsidiary
166. Global Fine Arts, Inc. Florida – Carnival Corporation Subsidiary
167. Global Fleet Management LLC Liberia – Royal Caribbean Cruises  
Ltd. Subsidiary
168. Global Fleet Management Two LLC Liberia – Royal Caribbean  
Cruises Ltd. Subsidiary
169. Global Shipping Service (Shanghai) Co., Ltd. China – Carnival  
Corporation Subsidiary
170. Going Srl Italy – MSC Cruises S.A. Subsidiary
171. Goodman, Honorable Jonathan – United States Magistrate Judge
172. Goulette Cruise Holding Limited UK – MSC Cruises S.A. Subsidiary
173. Grand Cruise Shipping Unipessoal Lda Portugal (Madeira) –  
Carnival Corporation Subsidiary

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174. Grand Turk Cruise Center Ltd. Turks & Caicos – Carnival Corporation Subsidiary
175. Grandeur of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
176. Gray, Corey P. – counsel for Carnival Corporation
177. Great Stirrup Cay Limited Bahamas – Norwegian Cruise Line Holdings, Ltd. Subsidiary
178. Greensboro S.L. Spain – Royal Caribbean Cruises Ltd. Subsidiary
179. Gwart Srl Italy – MSC Cruises S.A. Subsidiary
180. GXI, LLC Delaware – Carnival Corporation Subsidiary
181. HAL Antillen N.V. Curacao – Carnival Corporation Subsidiary
182. HAL Beheer B.V. Netherlands – Carnival Corporation Subsidiary
183. HAL Maritime Ltd. British Virgin Islands – Carnival Corporation Subsidiary
184. HAL Nederland N.V. Curacao – Carnival Corporation Subsidiary
185. HAL Properties Limited Bahamas – Carnival Corporation Subsidiary
186. HAL Services B.V. Netherlands – Carnival Corporation Subsidiary
187. Harmony of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary

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188. Harper, Chadwick J. – counsel for Royal Caribbean Cruises, Ltd.
189. Harvard Law School – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants in the District  
Court
190. Havana Docks Corporation – Appellee
191. Hernacki, Andrew T. – counsel for MSC Cruises S.A.
192. Hoch, Dorothy – shareholder of Havana Docks Corporation
193. Hogan Lovells LLP – counsel for Norwegian Cruise Line Holdings,  
Ltd.
194. Holding Division Iberocruceros SLU Spain – Carnival Corporation  
Subsidiary
195. Holland & Knight LLP – counsel for Royal Caribbean Cruises, Ltd.  
and Carnival Corporation
196. Holland America Line Inc. Washington – Carnival Corporation  
Subsidiary
197. Holland America Line N.V. Curacao – Carnival Corporation  
Subsidiary
198. Holland America Line U.S.A., Inc. Delaware – Carnival Corporation  
Subsidiary

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199. Hospedagm De Pomene (Mozambique) Lda Mozambique – MSC  
Cruises S.A. Subsidiary
200. HSE Hamburg School of Entertainment GmbH Germany – Carnival  
Corporation Subsidiary
201. Ibero Cruzeiros Ltda. Brazil – Carnival Corporation Subsidiary
202. Iberocruceros SLU Spain – Carnival Corporation Subsidiary
203. Independence of the Seas Inc. – Royal Caribbean Cruises Ltd.  
Subsidiary
204. Infinity Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
205. Information Assistance Corporation Bermuda – Carnival Corporation  
Subsidiary
206. Insignia Vessel Acquisition, LLC Delaware – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
207. International Cruise Services, S.A. de C.V. Mexico – Carnival  
Corporation Subsidiary
208. International Leisure Travel Inc. Panama – Carnival Corporation  
Subsidiary
209. International Maritime Recruitment Agency, S.A. de C.V. Mexico –  
Carnival Corporation Subsidiary

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210. Island for Science, Inc. Indiana – Royal Caribbean Cruises Ltd.  
Subsidiary
211. Islas Galapagos Turismo y Vapores CA Ecuador – Royal Caribbean  
Cruises Ltd. Subsidiary
212. Jewel of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
213. Johnson, Jerry M. – director of Havana Docks Corporation
214. Jones Day – counsel for Amicus Curiae Peter Kucik Supporting  
Defendants-Appellants
215. Jones Walker, LLP – counsel for Carnival Corporation
216. Kats, Vitaliy – counsel for Amici Curiae U.S. Travel Association,  
United States Tour Operators Association, Inc., and the American  
Society of Travel Advisors, Inc. Supporting Defendants-Appellants
217. Klingler, Richard – counsel for Havana Docks Corporation
218. Kroeger, Thomas A. – counsel for Havana Docks Corporation
219. Krystalsea Limited British Virgin Islands – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
220. Kucik, Peter – Amicus Curiae Supporting Defendants-Appellants

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221. Kwazulu Cruise Terminal (Pty) Ltd South Africa – MSC Cruises S.A.  
Subsidiary
222. Labadee Investments Ltd. Cayman Islands – Royal Caribbean  
Cruises Ltd. Subsidiary
223. Landau, Christopher – counsel for Havana Docks Corporation
224. Leonardo Five, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
225. Leonardo Four, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
226. Leonardo One, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
227. Leonardo Six, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd.  
Subsidiary
228. Leonardo Three, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
229. Leonardo Two, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
230. Li, Vincent – counsel for Havana Docks Corporation
231. Liberia – Royal Caribbean Cruises Ltd. Subsidiary

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232. Liberty of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.

Subsidiary

233. Lindsay III, Alvin F. – counsel for Norwegian Cruise Line Holdings,  
Ltd.

234. Lioli, Samuel V. – counsel for Amicus Curiae Peter Kucik Supporting  
Defendants-Appellants

235. Lipshultz, Zachary A. –counsel for Havana Docks Corporation

236. Lipshutz, Brian M. – counsel for Carnival Corporation

237. Llamas, Luis Emilio – counsel for Carnival Corporation

238. Loeb, Robert – counsel for MSC Cruises S.A. CO.; MSC Cruises  
(USA), Inc.; MSC Cruises, S.A.

239. Longoria-Green, Carmen N. – counsel for Amicus Curiae The  
Chamber of Commerce of the United States of America Supporting  
Defendants-Appellants

240. Lorenzo, Richard C. – counsel for Norwegian Cruise Line Holdings,  
Ltd.

241. Louis, Honorable Lauren F. – United States Magistrate Judge

242. Lutz, Zachary P. – counsel for Norwegian Cruise Line Holdings, Ltd

243. MacArthur Trust – shareholder of Havana Docks Corporation

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244. \*Maderal, Francisco – former counsel for Havana Docks Corporation
245. \*Manhas, Robbie – counsel for MSC Cruises S.A. Co., MSC Cruises (USA), Inc.; MSC Cruises, S.A.
246. Marcus, Steven – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants-Appellants
247. Margol & Margol, P.A. – counsel for Havana Docks Corporation
248. Margol, Rodney S. – counsel for Havana Docks Corporation (now at Spohrer Dodd Trial Attorneys)
249. Marina New Build, LLC Republic of the Marshall Islands –  
Norwegian Cruise Line Holdings, Ltd. Subsidiary
250. Mariner of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
251. Mariner, LLC Republic of the Marshall Islands – Norwegian Cruise  
Line Holdings, Ltd. Subsidiary
252. Marseille Provence Cruise Terminal SAS France – MSC Cruises S.A.  
Subsidiary
253. Martinez, Honorable Jose E. – United States District Court Judge
254. Martinez, Roberto – counsel for Havana Docks Corporation



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255. Massey & Gail LLP – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants in the District  
Court
256. Massey, Jonathan S. – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants in the District  
Court
257. Mayer Brown LLP – counsel for Amicus Curiae The Chamber of  
Commerce of the United States of America Supporting Defendants-  
Appellants
258. McAliley, Honorable Chris M. – United States Magistrate Judge
259. Mediterranean Cruises Travel Agency (Shanghai) Co Ltd China –  
MSC Cruises S.A. Subsidiary
260. Michel, Christopher – counsel for Norwegian Cruise Line Holdings,  
Ltd
261. Milestone N.V. Curacao – Carnival Corporation Subsidiary
262. Millennium Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
263. Moriceau, Alisha – counsel for Carnival Corporation
264. Msc Crewing Services Philippines Philippines – MSC Cruises S.A.  
Subsidiary

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265. MSC Cruceros SA Argentina – MSC Cruises S.A. Subsidiary
266. MSC Cruceros SA Spain – MSC Cruises S.A. Subsidiary
267. MSC Cruise Management (UK) Ltd UK – MSC Cruises S.A.  
Subsidiary
268. MSC Cruises (Australia) Pty Ltd Australia – MSC Cruises S.A.  
Subsidiary
269. MSC Cruises (Canada) Ltd Canada – MSC Cruises S.A. Subsidiary
270. MSC Cruises (Ireland) Ltd Ireland – MSC Cruises S.A. Subsidiary
271. MSC Cruises (USA) Inc USA – MSC Cruises S.A. Subsidiary
272. MSC Cruises (USA) Inc. – Appellant
273. MSC Cruises Asia Company Ltd China – MSC Cruises S.A.  
Subsidiary
274. MSC Cruises Barcelona Terminal SL Spain – MSC Cruises S.A.  
Subsidiary
275. MSC Cruises Belgium NV Belgium – MSC Cruises S.A. Subsidiary
276. MSC Cruises Gmbh Germany – MSC Cruises S.A. Subsidiary
277. MSC Cruises Japan Ltd Japan – MSC Cruises S.A. Subsidiary
278. MSC Cruises Limited UK – MSC Cruises S.A. Subsidiary
279. MSC Cruises Ltd Cyprus – MSC Cruises S.A. Subsidiary

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280. MSC Cruises S.A. Co. – Appellant
281. MSC Cruises Scandinavia AB Sweden – MSC Cruises S.A.  
Subsidiary
282. MSC Cruises Ship Management (Shanghai) Ltd China – MSC  
Cruises S.A. Subsidiary
283. MSC Cruises Shipping Service (Shanghai) Ltd China – MSC Cruises  
S.A. Subsidiary
284. MSC Cruises The Netherlands BV Netherlands – MSC Cruises S.A.  
Subsidiary
285. MSC Cruises, S.A. – Appellant
286. MSC Cruzeiros Do Brasil Ltda Brazil – MSC Cruises S.A. Subsidiary
287. MSC Cruzeiros SA Portugal – MSC Cruises S.A. Subsidiary
288. MSC Food & Beverage Division Spa Italy – MSC Cruises S.A.  
Subsidiary
289. MSC Italcatering Do Brasil Ltda Brazil – MSC Cruises S.A.  
Subsidiary
290. MSC Kreuzfahrten (Austria) Gmbh Austria – MSC Cruises S.A.  
Subsidiary
291. MSC Kreuzfahrten AG Switzerland – MSC Cruises S.A. Subsidiary

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292. MSC Krstarenja Doo Croatia – MSC Cruises S.A. Subsidiary
293. MSC Kruvaziyer Turizm AS Turkey – MSC Cruises S.A. Subsidiary
294. MSC Logistics (Mozambique) Ltd Mozambique – MSC Cruises S.A.  
Subsidiary
295. Msc Malta Seafarers Company Ltd Malta – MSC Cruises S.A.  
Subsidiary
296. MSC Mediagrafica Srl Italy – MSC Cruises S.A. Subsidiary
297. MSC Miami Cruise Terminal LLC USA – MSC Cruises S.A.  
Subsidiary
298. MSC Ocean Cay Ltd Bahamas – MSC Cruises S.A. Subsidiary
299. MSC Starlight Cruises Pty Ltd South Africa – MSC Cruises S.A.  
Subsidiary
300. Munyan, Katherine – counsel for MSC Cruises S.A. CO.; MSC  
Cruises (USA), Inc.; MSC Cruises, S.A.
301. Musica Cruise Limited UK – MSC Cruises S.A. Subsidiary
302. Nautica Acquisition, LLC Delaware – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
303. Navigator of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary

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304. Navigator Vessel Company, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
305. Navitrans S.R.L. Italy – Carnival Corporation Subsidiary
306. NCL (Bahamas) Ltd. d/b/a Norwegian Cruise Line Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
307. NCL (Guernsey) Limited Guernsey – Norwegian Cruise Line Holdings, Ltd. Subsidiary
308. NCL America Holdings, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
309. NCL America LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
310. NCL Australia Pty Ltd. Australia – Norwegian Cruise Line Holdings, Ltd. Subsidiary
311. NCL Construction Corp., Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
312. NCL Corporation Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
313. NCL Cruises Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary

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314. NCL Emerald Corporation, Limited Ireland – Norwegian Cruise Line Holdings, Ltd. Subsidiary
315. NCL Finance, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
316. NCL HK Holding, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
317. NCL Holding AS Norway – Norwegian Cruise Line Holdings, Ltd. Subsidiary
318. NCL Hong Kong Limited Hong Kong – Norwegian Cruise Line Holdings, Ltd. Subsidiary
319. NCL International, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary
320. NCL Japan KK Japan – Norwegian Cruise Line Holdings, Ltd. Subsidiary
321. NCL Singapore Pte. Ltd. Singapore – Norwegian Cruise Line Holdings, Ltd. Subsidiary
322. NCL UK IP CO LTD UK – Norwegian Cruise Line Holdings, Ltd. Subsidiary

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323. NCL US IP CO 1, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
324. NCL US IP CO 2, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
325. NCLC Investments Canada Ltd. Canada – Norwegian Cruise Line Holdings, Ltd. Subsidiary
326. NCLM Limited Malta – Norwegian Cruise Line Holdings, Ltd. Subsidiary
327. Nelson, Timothy G. – counsel for Amicus Curiae Cruise Lines International Association Supporting Defendants-Appellants
328. Nemeroff, Justin B. – counsel for MSC Cruises S.A.
329. New Co Armonia SA Panama – MSC Cruises S.A. Subsidiary
330. New Co Lirica SA Panama – MSC Cruises S.A. Subsidiary
331. New Co Opera SA Panama – MSC Cruises S.A. Subsidiary
332. New Co S32 SA Panama – MSC Cruises S.A. Subsidiary
333. New Co Sinfonia SA Panama – MSC Cruises S.A. Subsidiary
334. \*Norford, Elizabeth – counsel for Carnival Corporation
335. Norwegian Carnival Ltd United Kingdom – Norwegian Cruise Line Holdings, Ltd. Subsidiary

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336. Norwegian Compass Ltd. United Kingdom – Norwegian Cruise Line Holdings, Ltd. Subsidiary
337. Norwegian Cruise Co. Inc. Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
338. Norwegian Cruise Line Agência de Viagens Ltda. Brazil – Norwegian Cruise Line Holdings, Ltd. Subsidiary
339. Norwegian Cruise Line Group Italy S.r.l. Italy – Norwegian Cruise Line Holdings, Ltd. Subsidiary
340. Norwegian Cruise Line Group UK Limited (formerly Prestige Cruise Services (Europe) Limited) United Kingdom – Norwegian Cruise Line Holdings, Ltd. Subsidiary
341. Norwegian Cruise Line Holdings, Ltd. (NCLH) – Appellant
342. Norwegian Cruise Line India Private Limited India – Norwegian Cruise Line Holdings, Ltd. Subsidiary
343. Norwegian Dawn Limited Isle of Man – Norwegian Cruise Line Holdings, Ltd. Subsidiary
344. Norwegian Epic, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd. Subsidiary



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345. Norwegian Gem, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
346. Norwegian Jewel Limited Isle of Man – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
347. Norwegian Pearl, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
348. Norwegian Sextant Ltd. United Kingdom – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
349. Norwegian Sky, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
350. Norwegian Spirit, Ltd. Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
351. Norwegian Star Limited Isle of Man – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
352. Norwegian Sun Limited Bermuda – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary
353. Norwegian USCRA, Ltd. Bermuda – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
354. Nualy Investments Inc Panama – MSC Cruises S.A. Subsidiary

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355. Class Plus One, LLC Delaware – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary

356. Class Plus Two, LLC Delaware – Norwegian Cruise Line Holdings,  
Ltd. Subsidiary

357. Oasis of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary

358. Ocean Bahamas Innovation Ltd. Bahamas – Carnival Corporation  
Subsidiary

359. Ocean Medallion Fulfillment, Ltd. Bahamas – Carnival Corporation  
Subsidiary

360. Oceanadventures S.A. Ecuador – Royal Caribbean Cruises Ltd.  
Subsidiary

361. Oceania Cruises S. de R.L. (formerly Oceania Cruises, Inc.) Panama –  
Norwegian Cruise Line Holdings, Ltd. Subsidiary

362. OCI Finance Corp. Delaware – Norwegian Cruise Line Holdings, Ltd.  
Subsidiary

363. Odds On Gaming Corporation Delaware – Carnival Corporation  
Subsidiary

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364. Odyssey of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.

Subsidiary

365. Oliu, Pascual A. – counsel for Carnival Corporation

366. Operadora Catalina S.r.L. Dominican Republic – Carnival

Corporation Subsidiary

367. Orrick, Herrington & Sutcliffe LLP – counsel for MSC Cruises S.A.

368. Otazo-Reyes, Honorable Alicia M. – United States Magistrate Judge

369. Ovation of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.

Subsidiary

370. P&O Princess American Holdings UK – Carnival Corporation

Subsidiary

371. P&O Princess Cruises International Limited UK – Carnival

Corporation Subsidiary

372. P&O Princess Cruises Pension Trustee Limited UK – Carnival

Corporation Subsidiary

373. P&O Properties (California), Inc. California – Carnival Corporation

Subsidiary

374. P&O Travel Limited UK – Carnival Corporation Subsidiary

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375. Palumbo Malta Shipyard Limited Malta – MSC Cruises S.A.  
Subsidiary
376. Palumbo Shipyard Limited Malta – MSC Cruises S.A. Subsidiary
377. \*Paul Hastings, LLP – counsel for Amici Curiae U.S. Travel  
Association, United States Tour Operators Association, Inc., and the  
American Society of Travel Advisors, Inc. Supporting Defendants-  
Appellants
378. Paul, Weiss, Rifkind, Wharton & Garrison LLP – counsel for Carnival  
Corporation
379. Pegg, Allen P. – counsel for Norwegian Cruise Line Holdings, Ltd.
380. Pettlier, Romain Le – shareholder of Havana Docks Corporation
381. Piccapietra Finance S.r.l. Italy – Carnival Corporation Subsidiary
382. Ponce, Scott D. – counsel for Royal Caribbean Cruises, Ltd. And  
Carnival Corporation
383. Prestige Cruise Holdings S. de R.L. (formerly Prestige Cruise  
Holdings, Inc.) Panama – Norwegian Cruise Line Holdings, Ltd.  
Subsidiary
384. Prestige Cruise Services LLC Delaware – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary

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385. Prestige Cruises Air Services, Inc. Florida – Norwegian Cruise Line Holdings, Ltd. Subsidiary
386. Prestige Cruises International S. de R.L. (formerly Prestige Cruises International, Inc.) Panama – Norwegian Cruise Line Holdings, Ltd. Subsidiary
387. Prestige Cruises Management S.A.M. Monaco – Carnival Corporation Subsidiary
388. Prestige Cruises N.V. Curacao – Carnival Corporation Subsidiary
389. Preziosa Cruise Limited UK – MSC Cruises S.A. Subsidiary
390. Pride of America Ship Holding, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
391. Pride of Hawaii, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
392. Princess Bermuda Holdings, Ltd. Bermuda – Carnival Corporation Subsidiary
393. Princess Cays Ltd. Bahamas – Carnival Corporation Subsidiary
394. Princess Cruise Corporation Inc. Panama – Carnival Corporation Subsidiary

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395. Princess Cruise Lines, Ltd. Bermuda – Carnival Corporation  
Subsidiary
396. Princess Cruises and Tours, Inc. Delaware – Carnival Corporation  
Subsidiary
397. Princess U.S. Holdings, Inc. California – Carnival Corporation  
Subsidiary
398. \*Proctor, Ryan M – counsel for Amicus Curiae Peter Kucik  
Supporting Defendants-Appellants
399. Quantum of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
400. Quinn Emanuel Urquhart & Sullivan, LLP – counsel for Norwegian  
Cruise Line Holdings, Ltd
401. Radiance of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
402. RCI Holdings LLC Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
403. RCL (UK) Ltd. – Royal Caribbean Cruises Ltd. Subsidiary England  
and Wales

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404. RCL Cruise Holdings LLC Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
405. RCL Cruises Ltd. – Royal Caribbean Cruises Ltd. Subsidiary  
England and Wales
406. RCL GEO LLC Florida – Royal Caribbean Cruises Ltd. Subsidiary
407. RCL Holdings Cooperatief U.A. Netherlands – Royal Caribbean  
Cruises Ltd. Subsidiary
408. RCL Horizon LLC Liberia – Royal Caribbean Cruises Ltd. Subsidiary
409. RCL Investments Ltd. – Royal Caribbean Cruises Ltd. Subsidiary  
England and Wales
410. RCL Monarch LLC Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
411. RCL New Vessel Holding Company LLC Liberia – Royal Caribbean  
Cruises Ltd. Subsidiary
412. RCL Sovereign LLC Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
413. RCL TUI Cruises German Holding GmbH & Co. KG Germany –  
Royal Caribbean Cruises Ltd. Subsidiary

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414. RCL Worldwide (Hong Kong) Limited Hong Kong – Royal Caribbean Cruises Ltd. Subsidiary
415. RCL Worldwide Ltd. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
416. RCL Zenith LLC Liberia – Royal Caribbean Cruises Ltd. Subsidiary
417. RCT Maintenance & Related Services S.A. Honduras – Carnival Corporation Subsidiary
418. RCT Pilots & Related Services, S.A. Honduras – Carnival Corporation Subsidiary
419. RCT Security & Related Services S.A. Honduras – Carnival Corporation Subsidiary
420. Regatta Acquisition, LLC Delaware – Norwegian Cruise Line Holdings, Ltd. Subsidiary
421. Rhapsody of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
422. Rider-Longmaid, Parker – counsel for Amicus Curiae Cruise Lines International Association Supporting Defendants-Appellants
423. Riviera New Build, LLC Republic of the Marshall Islands – Norwegian Cruise Line Holdings, Ltd. Subsidiary



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424. Roatan Cruise Terminal S.A. de C.V. Honduras – Carnival Corporation Subsidiary
425. Rosenkranz, E. Joshua – counsel for MSC Cruises S.A.
426. Rowen, Matthew D. – counsel for Royal Caribbean Cruises, Ltd.
427. Royal Caribbean Cruise Lines AS Norway – Royal Caribbean Cruises Ltd. Subsidiary
428. Royal Caribbean Cruises (Asia) Pte. Ltd. Singapore – Royal Caribbean Cruises Ltd. Subsidiary
429. Royal Caribbean Cruises Services (China) Company Limited China – Royal Caribbean Cruises Ltd. Subsidiary
430. Royal Caribbean Cruises, Ltd. (RCL) – Appellant
431. Royal Hyway Tours, Inc. Alaska – Carnival Corporation Subsidiary
432. Saieh, Sabrina S. – counsel for Havana Docks Corporation
433. Saladrigas, Caitlin F. – counsel for Royal Caribbean Cruises, Ltd.
434. Santa Cruz Terminal, S.L. Spain – Carnival Corporation Subsidiary
435. Schultz, Meredith L. – counsel for Carnival Corporation
436. Seabourn Cruise Line Limited Bermuda – Carnival Corporation Subsidiary

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437. Seahawk One, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd.

Subsidiary

438. Seahawk Two, Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd.

Subsidiary

439. SeaVacations Limited UK – Carnival Corporation Subsidiary

440. SeaVacations UK Limited UK – Carnival Corporation Subsidiary

441. Serenade of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.

Subsidiary

442. Seven Seas Cruises S. de R.L. Panama – Norwegian Cruise Line

Holdings, Ltd. Subsidiary

443. SG Cruises GmbH Switzerland – Royal Caribbean Cruises Ltd.

Subsidiary

444. SG Expeditions Cyprus Limited Cyprus – Royal Caribbean Cruises

Ltd. Subsidiary

445. SG Expeditions SAGL Switzerland – Royal Caribbean Cruises Ltd.

Subsidiary

446. Shaffer, Derek L. – counsel for Norwegian Cruise Line Holdings, Ltd

447. Shanghai Coast Cruise Consulting Co. Lda China – Carnival

Corporation Subsidiary

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448. Shanmugam, Kannon K. – counsel for Carnival Corporation
449. Ship Care (Bahamas) Limited Bahamas – Carnival Corporation  
Subsidiary
450. Silver Cloud Shipping Co. Ltd. Bahamas – Royal Caribbean Cruises  
Ltd. Subsidiary
451. Silver Muse Shipping Co. Ltd. Bahamas – Royal Caribbean Cruises  
Ltd. Subsidiary
452. Silver Shadow Shipping Co. Ltd. Bahamas – Royal Caribbean  
Cruises Ltd. Subsidiary
453. Silver Spirit Shipping Co. Ltd. Bahamas – Royal Caribbean Cruises  
Ltd. Subsidiary
454. Silver Wind Shipping Ltd. Bahamas – Royal Caribbean Cruises Ltd.  
Subsidiary
455. Silversea Cruise Finance Ltd. Bahamas – Royal Caribbean Cruises  
Ltd. Subsidiary
456. Silversea Cruise Holding Ltd. Bahamas – Royal Caribbean Cruises  
Ltd. Subsidiary
457. Silversea Cruises (Europe) Ltd. England and Wales – Royal  
Caribbean Cruises Ltd. Subsidiary

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458. Silversea Cruises (UK) Ltd. England and Wales – Royal Caribbean Cruises Ltd. Subsidiary
459. Silversea Cruises Australia Pty. Ltd. Australia – Royal Caribbean Cruises Ltd. Subsidiary
460. Silversea Cruises Canada Ltd. Canada – Royal Caribbean Cruises Ltd. Subsidiary
461. Silversea Cruises Ltd. Bahamas – Royal Caribbean Cruises Ltd. Subsidiary
462. Silversea Cruises South Africa Pty. Ltd. South Africa – Royal Caribbean Cruises Ltd. Subsidiary
463. Silversea New Build Seven Ltd. Bahamas – Royal Caribbean Cruises Ltd. Subsidiary
464. Silversea RCL Holdings LLC Liberia – Royal Caribbean Cruises Ltd. Subsidiary
465. Silversea SAM Monaco – Royal Caribbean Cruises Ltd. Subsidiary
466. Singer, Stuart H. – counsel for Carnival Corporation
467. Sirena Acquisition Cayman Islands – Norwegian Cruise Line Holdings, Ltd. Subsidiary
468. Sitmar Cruises Inc. Panama – Carnival Corporation Subsidiary

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469. Sixthman Ltd. Bermuda – Norwegian Cruise Line Holdings, Ltd.

Subsidiary

470. Skadden, Arps, Slate, Meagher & Flom, LLP - counsel for Amicus

Curiae Cruise Lines International Association Supporting

Defendants-Appellants

471. SNC Fantasia Bail France – MSC Cruises S.A. Subsidiary

472. SNC Splendida Bail France – MSC Cruises S.A. Subsidiary

473. Societe Labadee Nord, S.A. Haiti – Royal Caribbean Cruises Ltd.

Subsidiary

474. Spanish Cruise Services N.V. Curacao – Carnival Corporation

Subsidiary

475. Spectrum of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.

Subsidiary

476. Spezia & Carrara Cruise Terminal Srl Italy – MSC Cruises S.A.

Subsidiary

477. Spohrer Dodd Trial Attorneys – counsel for Havana Docks

Corporation

478. SSC Finance Corp. Delaware – Norwegian Cruise Line Holdings, Ltd.

Subsidiary

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479. Stander, Robert N. – counsel for Amicus Curiae Peter Kucik  
Supporting Defendants-Appellants
480. Sullivan, Kathleen M. – counsel for Norwegian Cruise Line Holdings,  
Ltd
481. Summit Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary
482. Sun Princess II Limited Bermuda – Carnival Corporation Subsidiary
483. Sun Princess Limited Bermuda – Carnival Corporation Subsidiary
484. Sunshine Shipping Corporation Ltd. Bermuda – Carnival  
Corporation Subsidiary
485. Super, John – counsel for Norwegian Cruise Line Holdings, Ltd.
486. Symphony of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
487. T&T International, Inc. Texas – Carnival Corporation Subsidiary
488. Tager, Evan M. – counsel for Amicus Curiae The Chamber of  
Commerce of the United States of America Supporting Defendants-  
Appellants
489. Taormina, Benjamin A. – counsel for Royal Caribbean Cruises, Ltd.
490. Terminal De Cruceros Punta Del Este SA Uruguay – MSC Cruises  
S.A. Subsidiary

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491. The Chamber of Commerce of the United States of America –  
Amicus Curiae Supporting Defendants-Appellants
492. Torcatt Enterprises Limitada Costa Rica – Royal Caribbean Cruises  
Ltd. Subsidiary
493. Tour Alaska, LLC Delaware – Carnival Corporation Subsidiary
494. Transnational Services Corporation Panama – Carnival Corporation  
Subsidiary
495. Tribe, Laurence H. – counsel for Amicus Curiae Cruise Lines  
International Association Supporting Defendants in the District  
Court
496. Trident Insurance Company Ltd. Bermuda – Carnival Corporation  
Subsidiary
497. Trieste Adriatic Maritime Initiatives Srl Italy – MSC Cruises S.A.  
Subsidiary
498. U.S. Travel Association – Amicus Curiae Supporting Defendants-  
Appellants
499. United States Tour Operators Association, Inc. – Amicus Curiae  
Supporting Defendants-Appellants
500. Venable LLP – counsel for Defendant-Appellant MSC Cruises S.A.

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501. Venezia Investimenti Srl Italy – MSC Cruises S.A. Subsidiary
502. Vice, Abigail Frisch – counsel for Carnival Corporation
503. Vision of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
504. Von Bokern, Jordan L. – counsel for Amicus Curiae The Chamber of  
Commerce of the United States of America Supporting Defendants-  
Appellants
505. Voyager of the Seas Inc. Liberia – Royal Caribbean Cruises Ltd.  
Subsidiary
506. Voyager Vessel Company, LLC Delaware – Norwegian Cruise Line  
Holdings, Ltd. Subsidiary
507. Wang, Jonas – counsel for MSC Cruises S.A. CO.; MSC Cruises  
(USA), Inc.; MSC Cruises, S.A.
508. West Sicily Gates Srl Italy – MSC Cruises S.A. Subsidiary
509. Westmark Hotels of Canada, Ltd. Canada – Carnival Corporation  
Subsidiary
510. Westmark Hotels, Inc. Alaska – Carnival Corporation Subsidiary
511. Whisper SpA Italy – Royal Caribbean Cruises Ltd. Subsidiary
512. Whitaker, Walter H. – shareholder of Havana Docks Corporation



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513. White Sand Inc. Liberia – Royal Caribbean Cruises Ltd. Subsidiary

514. World Leading Cruise Management (Shanghai) Co., Ltd. China –  
Carnival Corporation Subsidiary

515. XP Tours S.A. Ecuador – Royal Caribbean Cruises Ltd. Subsidiary

Pursuant to Federal Rules of Appellate Procedure 27(a)(3) and 29, Plaintiff-Appellee-Cross-Appellant Havana Docks Corporation hereby opposes the motion by Cruise Lines International Association (CLIA) to file an amicus curiae brief in support of appellants in these consolidated appeals. In support of this opposition, Havana Docks states as follows:

1. Havana Docks has no problem with the four appellants in this case rounding up as many amici as they wish, as long as those amici are independent of appellants. Thus, Havana Docks did not object to any of the other three amicus briefs filed in support of appellants.

2. Proposed amicus CLIA, however, does not meet even this minimal standard, because CLIA is *not* independent of appellants. Rather, as CLIA itself recognizes, “Defendants-Appellants ... are four of the six voting members of [CLIA’s] Global Executive Committee, which voted to authorize and file the proposed brief.” CLIA Mot. 1 n.\*. In other words, CLIA is not just a trade association that happens to include appellants among its members (as some of the other amici—the U.S. Chamber of Commerce and various travel-related associations—may be). Rather, CLIA is controlled by appellants, and (by CLIA’s own admission) appellants themselves “voted to authorize and file” the CLIA brief. *Id.*

3. CLIA’s motion identifies no precedent in the history of American law where an entity controlled by a party has been allowed to file an amicus brief in support of that party. That omission is not surprising: an amicus brief filed by an entity controlled by a party provides no independent perspective, but instead simply allows that party to evade the court’s word limitations. If this brief is allowed, no logical stopping point would prevent amicus briefs filed by a party’s corporate subsidiaries, affiliates, or other controlled entities.

4. CLIA’s assertion that its “internal operations are not relevant to this motion,” *id.* at 5, can only be described as puzzling. No one is challenging CLIA’s “internal operations” *per se*. Rather, Havana Docks is simply pointing out that it would be an unprecedented abuse of the amicus process to allow an entity concededly controlled by certain litigants to file an amicus brief in support of those very same litigants.

5. Such abuse is particularly manifest here because the record developed below shows that appellants used CLIA as a joint defense group to coordinate their legal strategy in response to private lawsuits (like this one) filed under Title III of the LIBERTAD Act, Pub. L. No. 104-114, 110 Stat. 785 (1996). As Bradley M. Rose, CLIA’s longtime outside

General Counsel, explained in a declaration filed below, every CLIA member is required to sign an agreement known as the “CLIA Common Legal Interest Agreement” in an effort to bring their communications within the scope of the attorney-client privilege. *See* Carnival Dkt. (No. 19-21724) 318-40 at ECF pp. 3-4. As a joint defense group, CLIA “spearheaded” a “common legal strategy ... related to challenging Title III, defending potential Title III litigation, and resolving Title III claims on behalf of its members.” *Id.* at 6; *see also id.* at 8 (“CLIA’s counsel (including myself) provided legal advice, created attorney work product and facilitated conversations related to furthering a common strategy to ... challenge Title III lawsuits.”); Carnival Dkt. 318-41 (compiled and authenticated records of same). If CLIA is allowed to file an amicus brief here, any joint defense group could claim that it is also entitled to file an amicus brief supporting its litigant members.

6. CLIA insists, however, that its proposed amicus brief provides “important context” that appellants fail to provide. CLIA Mot. 5; *see also id.* at 2 (“CLIA’s proposed amicus brief is especially important because the parties do not address the industry-wide consequences of the district court’s ruling, nor do they situate the cruises’ excursions within the

broader context of travel to Cuba during this time.”). But appellants are perfectly familiar with “industry-wide consequences,” as they collectively account for over three-quarters of the cruise industry’s passengers and revenue, *see, e.g.*, 2021 Worldwide Cruise Line Market Share, CRUISE MARKET WATCH, <https://cruisemarketwatch.com/market-share/> (last visited July 11, 2023), and their own briefs devote pages to attempting to “situate the cruises’ excursions within the broader context of travel to Cuba during this time,” CLIA Mot. 2; *see generally* Joint Br. 12-19, 47-59; Carnival Br. 9-14, 36-42. In any event, this is exactly the “context” that two other amicus briefs—one authored by several travel associations and the other by a former government official—seek to provide. *See* U.S. Travel Ass’n *et al.* Amicus Br. 6-14; Kucik Amicus Br. 3-13, 15-26. Insofar as appellants left out any “important context” from their briefs, CLIA Mot. 5, that is their own choice. Alleged shortcomings in appellants’ briefs hardly justify allowing an entity that they control, and that accordingly has no independent perspective to provide, an opportunity to fill a supposed gap created by this Court’s word limitations. It is telling that no other industry participant *not* controlled by appellants felt the

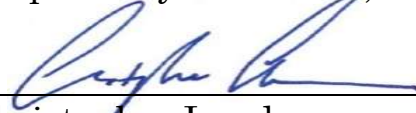
need to provide such additional “important context,” *id.*, which is really nothing more than an unwarranted extension of appellants’ briefs.

7. Indeed, the district court denied CLIA leave to file an amicus brief, noting that “CLIA has failed to explain how its brief will benefit the Court by offering a new or unique perspective beyond that already presented by the parties,” who are “represented by extremely capable and skilled counsel” and who were allowed to “engage in a modified and greatly expanded” briefing process. *Carnival Dkt. 358 at 2-4.*

8. The same is true here. Appellants and their unopposed amici have already provided this Court with voluminous briefing setting forth their position in these consolidated appeals. Three of the four appellants filed an overlength Joint Brief, while the fourth appellant filed a freestanding full-length brief. Three other amici have filed briefs supporting appellants. These five briefs, authored by able appellate counsel, already have set forth 48,775 words in support of appellants and exhaustively canvass all the issues. Appellants and their amici should be more than capable of making their case in 48,775 words. There is nothing to be gained by allowing appellants to add yet another 4,571 words to the mix through their mouthpiece CLIA.

July 11, 2023

Respectfully submitted,



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## CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rules of Appellate Procedure 27(d)(1)(E), 27(d)(2)(A), and 32(g)(1), I certify that the foregoing motion is proportionately spaced using 14-point Century Schoolbook font and contains 1,032 words, excluding the parts of the motion exempted from length limits by Rules 27(d)(2) and 32(f).



Christopher Landau



## CERTIFICATE OF SERVICE

I hereby certify that, on July 11, 2023, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the Eleventh Circuit by using the appellate CM/ECF system. I further certify that all participants in the case are registered CM/ECF users and will be served by the appellate CM/ECF system.



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Christopher Landau