UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:19-cv-23591-BLOOM/LOUIS

HAVANA DOCKS CORPORATION,

Plaintiff,

vs.

NORWEGIAN CRUISE LINE HOLDINGS LTD.,

Defendant.
_____ /

JOINT NOTICE OF MOOTNESS AS TO
NOTICED ISSUE IN DOCKET ENTRY 152

The Court held a discovery hearing in this matter on March 18, 2021, in connection with, among other issues, Defendant's Notice of Hearing (ECF No. 152). Defendant sought to compel the production of a ledger from Havana Docks Corporation in response to its third request for documents, which asks for:

> All documents sufficient to identify all of the payments, including reimbursement payments made to Javier Garcia-Bengochea, made by You to any third-party related to any efforts to enforce the terms of the Helms-Burton Act, identifying the payment recipient, date, amount, and the purpose of each payment.

Havana Docks objected on the basis of relevance and proportionality.

The parties have further conferred and have reached an agreement pursuant to which Plaintiff will produce the ledger kept by Jerry Johnson on behalf of Havana Docks, showing all payments made to third parties (with amounts of attorneys' fees and any attorney-client information reflected in that ledger being redacted) in

response to this discovery request and subject to Defendant's reservation of rights to later seek the production of any redacted attorneys' fees amounts should grounds therefor exist and Havana Docks' reservation of rights to object to production of same. Accordingly, the parties notify the Court that the sole issue raised in Defendant's Notice of Hearing (ECF No. 152) is now moot.

Dated: March 24, 2021.

Respectfully submitted,

s/ Stephanie A. Casey
Roberto Martínez
Florida Bar No.: 305596
Stephanie A. Casey
Florida Bar No.: 97483
Zachary A. Lipshultz
Florida Bar No. 123594
Aziza F. Elayan-Martínez
Florida Bar No. 92736

COLSON HICKS EIDSON, P.A.
255 Alhambra Circle, PH
Coral Gables, FL 33134
Tel: (305) 476-7400

– and –

Rodney S. Margol
Florida Bar No. 225428

MARGOL & MARGOL, P.A.
2029 3rd Street North
Jacksonville Beach, Florida 32250
Telephone: (904) 355-7508
Facsimile: (904) 619-8741

Attorneys for Plaintiff

s/ Allen P. Pegg
Richard C. Lorenzo
Florida Bar No. 071412
Allen P. Pegg
Florida Bar No. 597821

HOGAN LOVELLS US LLP
600 Brickell Avenue, Suite 2700
Miami, Florida 33131
Tel: (305) 459-6500

Attorneys for Defendant