EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 19-cv-23965-MGC

JOSE RAMON LÓPEZ REGUEIRO

plaintiff

v.

AMERICAN AIRLINES INC. and
LATAM AIRLINES GROUP, S.A.,

defendants.
_____/

DECLARATION OF MARIA PAULA ALVAREZ

I, Maria Paula Alvarez, make the following declarations in support of the Opposition to the Motion to Dismiss:

1. I am over the age of 18, and I give this declaration on my personal knowledge.
2. I am a citizen of the United States and a resident of the State of Florida.
3. On December 10, 2019, while in Florida, I accessed LATAM's website: https://www.latam.com/vamos/en_us/destinations/caribbean/cuba/havana/, which showcases Cuba as one of its popular Caribbean destinations and advertises restaurants, hotels, and tourist attractions in the island. *See* attached Exhibit A.
4. On the same date, I accessed LATAM's website: https://www.latam.com/en-us/flights-to-havana. This page advertises Havana as a tourist destination and suggests trip plans for going there. *See* attached Exhibit B.
5. I also accessed: https://www.latam.com/en_us/apps/personas/booking?fecha2_dia=24&country=us&vuelos_fecha_salida_ddmmaaaa=17/12/2019&auAvailability=1&language=en&nadults=1&cabina=Y&ninfants=0&fecha2_anomes=2019-12&ida_vuelta=ida_vuelta&fecha1_dia=17&fecha1_anomes=2019-12&from_city2=LIM&from_city1=LIM&flex=1&vuelos_fecha_regreso_ddm

maaaa=24/12/2019&to_city1=HAV&nchildren=0&to_city2=HAV#/. This website allows customers in Florida to purchase flights to the José Martí International Airport in Havana. *See* attached Exhibit C.

6. A connecting flight from Florida is available from the same website at: https://www.latam.com/en_us/apps/personas/booking?fecha2_dia=24&country=us&vuelos_fecha_salida_ddmmaaaa=17/12/2019&auAvailability=1&language=en&nadults=1&cabina=Y&ninfants=0&fecha2_anomes=2019-12&ida_vuelta=ida_vuelta&fecha1_dia=17&fecha1_anomes=2019-12&from_city2=MIA&from_city1=MIA&flex=1&vuelos_fecha_regreso_ddmmaaaa=24/12/2019&to_city1=LIM&nchildren=0&to_city2=LIM#/. *See* attached Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 10, 2019.

EXHIBIT A

GMT -4

SPANISH

CUBAN NATIONAL PESO, NATIONAL CURRENCY (MN), UTILIZED BY THE LOCAL POPULATION, AND CONVERTIBLE CUBAN PESO (CUC), EXCHANGE VALUE FOR TOURISTS

110V/220V

Surrounded by the blue waters of the Caribbean Sea, the Cuban capital is a place of contrasts. Sumptuous structures, like the Capitolio, share space with colorful houses and cars from the 1950s that take tourists from all over the world to see the city. Havana also features a rich cultural life, with good music, mojitos, and friendly people. An interesting contemporary scene has been blossoming in the city in the form of art galleries, shops, and cultural centers.

Explore passages to this destination

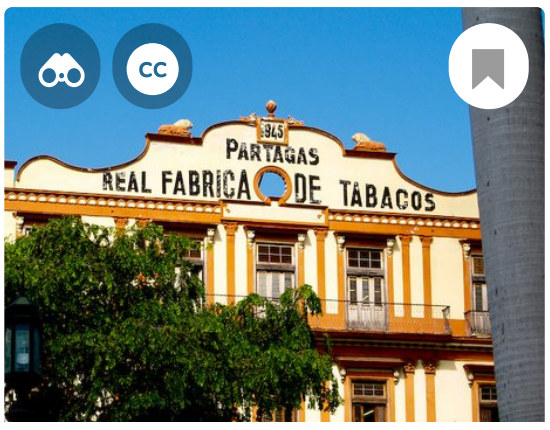
Selected

Top | Must See | Restaurants | Events | Hotels

Categories

Total: 45

Map



Malecon

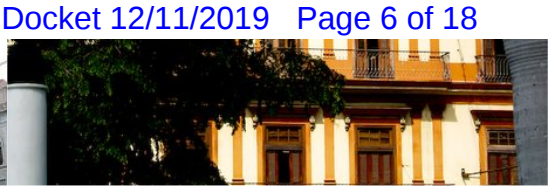
La Habana

Sights An...

Museum of the Revolution and Granma Memorial

La Habana

Sights And Attractions



Real Partagás Tobacco Factory

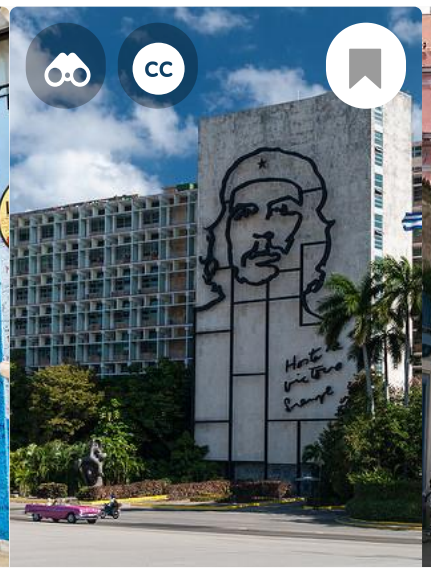
La Habana

Sights And Attr...

La Bodeguita del Medio

La Habana

Nightlife



Plaza de la Revolución

La Habana

Sights And...

Hemingway's Havana

La Habana

Sights An...

‹ 1 out of 8 ›

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LATAM

EXHIBIT B

LATAM AIRLINES

Search Flights to Havana (HAV)

One Way Round Trip

Flying to more than one destination?

FROM: City or airport

TO: City or airport

DEPART: 12/17/2019

RETURN: 12/24/2019

PASSENGERS: 1 Passenger

More options

Search Flights

Home / Flights / To Havana

No Search Results

Traveling to Havana

Founded in the16th century, Cuba's capital of Havana is known for its sunny weather and the warm waters of the Gulf of Mexico and the Atlantic Ocean. Its gorgeous beaches and a blend of historic and modernist architecture delight millions of travelers each year. Book your ight to Havana aboard a spacious and comfortable LATAM airplane today and get ready to dance the night away in one of Havana's famous nightclubs.

Reasons to visit Havana

See the baroque, asymmetrical beauty of the Cathedral of San Cristobal. Take a long walk down the El Malecón. Take a tour of the Havana Club Rum Factory for enlightenment on Havana's most famous rum. You can experience the Cuban Revolution at the Museum of the Revolution. Then, view the monuments to Jose Marti and Che Guevara at the Plaza de la Revolución. At Old Town's Camera Obscura, you'll discover awe-inspiring 360-degree views of the city. Afterward, go to the Malecon – the sea wall – and join the party.

When to travel to Havana

Most tourists hit Havana from December until March and July through August, Havana's premier seasons. Winter temperatures in January and February can drop as low as 15 degrees Celsius (59 Fahrenheit), which is chilly for usually tropical Havana.

Weather in Havana

Tuesday

68 °F
12/10/2019

Wednesday	85 °F 12/11/2019
Thursday	82 °F 12/12/2019
Friday	82 °F 12/13/2019
Saturday	81 °F 12/14/2019
Sunday	83 °F 12/15/2019
Monday	84 °F 12/16/2019

Powered by: OpenWeatherMap.org

Suggested Flights

Santa Cruz - Havana

Salta - Havana

Santiago - Havana

Cordoba - Havana

Buenos Aires - Havana

Asunción - Havana

Antofagasta - Havana

San Miguel de Tucumán - Havana

Lima - Havana

Mendoza - Havana

La Paz - Havana

Montevideo - Havana

Neuquén - Havana

From Havana

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LATAM

EXHIBIT C

LATAM LATAM Help Center

Lima to Havana

December 17 to December 24, 2019 1 adult Economy Change search

Flights

Step 2 of 6

Prices are per person and by segment, including taxes and fees. Final price will be shown when you select your complete itinerary. Review our baggage policy and other optional services fees.

Select your outbound flight

Mon 16 DEC	Tue 17 DEC	Wed 18 DEC
US$ 338	US$ 338	US$ 338

Money Points

Sort by: Recommended flight

08:40 LIM > **14:05** HAV
Direct – 5h 25min

LA2412 - Operated by LATAM Perú

Outbound from
US$ 338
2 seats left!

08:45 LIM > **19:05** HAV
1 stop – 10h 20min

08:45 LIM > **14:12** CUN
LA2458 - Operated by LATAM Perú

17:50 CUN > **19:05** HAV
40902 - Operated by Interjet

Outbound from
US$ 692
4 seats left!

08:45 LIM > **23:35** HAV
1 stop – 14h 50min

08:45 LIM > **14:12** CUN

Outbound from
US$ 586
2 seats left!

LA2458 - Operated by LATAM Perú
22:25 CUN > **23:35** HAV
40904 - Operated by Interjet

09:25 LIM > **09:35**[+1] HAV
2 stops – 24h 10min

Outbound from
US$ **1,019**
2 seats left!

09:25 LIM > **14:25** MEX
LA2472 - Operated by LATAM Perú

17:00 MEX > **20:15** CUN
402382 - Operated by Interjet

08:25 CUN > **09:35** HAV
40900 - Operated by Interjet

09:25 LIM > **09:35**[+1] HAV
2 stops – 24h 10min

Outbound from
US$ **1,019**
2 seats left!

09:25 LIM > **14:25** MEX
LA2472 - Operated by LATAM Perú

19:00 MEX > **22:15** CUN
402386 - Operated by Interjet

08:25 CUN > **09:35** HAV
40900 - Operated by Interjet

09:25 LIM > **09:35**[+1] HAV
2 stops – 24h 10min

Outbound from
US$ **1,019**
2 seats left!

09:25 LIM > **14:25** MEX
LA2472 - Operated by LATAM Perú

20:00 MEX > **23:15** CUN
402388 - Operated by Interjet

08:25 CUN > **09:35** HAV
40900 - Operated by Interjet

09:25 LIM > **09:35**[+1] HAV
2 stops – 24h 10min

Outbound from
US$ **1,019**
2 seats left!

09:25 LIM > **14:25** MEX
LA2472 - Operated by LATAM Perú

18:00 MEX > **21:20** CUN
402384 - Operated by Interjet

08:25 CUN > **09:35** HAV
40900 - Operated by Interjet

General flight information

- For roundtrips: The prices of return flights will vary depending on which outbound flight you choose.
- If you choose a fare that allows a partial or full refund, remember that you can only request the refund before the first flight on your itinerary departs.
- Review the cabin upgrade conditions associated with your fare.
- The airplane model may vary for operational reasons.
- The quotas and prices are subject to confirmation in the following steps.
- You can use coupons for a cabin upgrade only when purchasing Plus and Top fares. Review the cabin upgrade conditions associated with your fare.
- Please review our baggage policies, and optional services.

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LATAM

EXHIBIT D

LATAM LATAM Help Center

Miami to Lima

December 17 to December 24, 2019 1 adult Economy Change search

Flights

Step 2 of 6

Prices are per person and by segment, including taxes and fees. Final price will be shown when you select your complete itinerary. Review our baggage policy and other optional services fees.

Select your outbound flight

Mon 16 DEC	Tue 17 DEC	Wed 18 DEC
US$ 854	US$ 611	US$ 611

Money Points

Sort by: Recommended flight

01:00 MIA > **06:45** LIM
Direct – 5h 45min

LA2461 - Operated by LATAM Perú

Outbound from
US$ 611
2 seats left!

16:40 MIA > **22:25** LIM
Direct – 5h 45min

LA2467 - Operated by LATAM Perú

Outbound from
US$ 611
4 seats left!

21:15 MIA > **10:50**[+1] LIM
1 stop – 13h 35min

21:15 MIA > **07:20**[+1] SCL
LA501 - Operated by LATAM Airlines

09:05 SCL > **10:50** LIM
LA600 - Operated by LATAM Airlines

Outbound from
US$ 2,571

21:15 MIA > **12:12**[+1] LIM
1 stop 14h 57min

Outbound from
US$ 2,198

– 14h 37min

21:15 MIA > 07:20 SCL
LA501 - Operated by LATAM Airlines

10:28 SCL > 12:12 LIM
LA640 - Operated by LATAM Airlines

08:35 MIA > **20:47** LIM
1 stop – 12h 12min

Outbound from
US$ **819**
2 seats left!

08:35 MIA > 10:26 CUN
AA1157 - Operated by American Airlines

15:35 CUN > 20:47 LIM
LA2459 - Operated by LATAM Perú

16:34 MIA > **05:44**[+1] LIM
1 stop – 13h 10min

Outbound from
US$ **1,240**
4 seats left!

16:34 MIA > 18:20 CUN
AA158 - Operated by American Airlines

00:32 CUN > 05:44 LIM
LA2457 - Operated by LATAM Perú

08:30 MIA > **22:30** LIM
1 stop – 14h

Outbound from
US$ **1,659**
5 seats left!

08:30 MIA > 09:40 MCO
AA2544 - Operated by American Airlines

16:25 MCO > 22:30 LIM
LA2473 - Operated by LATAM Perú

06:54 MIA > **22:30** LIM
1 stop – 15h 36min

Outbound from
US$ **1,659**
5 seats left!

06:54 MIA > 08:05 MCO
AA2657 - Operated by American Airlines

16:25 MCO > 22:30 LIM
LA2473 - Operated by LATAM Perú

General flight information

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- Review the cabin upgrade conditions associated with your fare.
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- The quotas and prices are subject to confirmation in the following steps.
- You can use coupons for a cabin upgrade only when purchasing Plus and Top fares. Review the cabin upgrade conditions associated with your fare.
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