

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

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

CARNIVAL CORPORATION,  
Defendant.

---

Case No. 19-cv-21724  
BLOOM/MCALILEY

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

MSC CRUISES SA, et al.,  
Defendants.

---

Case No. 19-cv-23588  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
Defendant.

---

Case No. 19-cv-23590  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

NORWEGIAN CRUISE LINE HOLDINGS,  
LTD.,  
Defendant.

---

Case No.: 19-cv-23591  
BLOOM/LOUIS

**PLAINTIFF HAVANA DOCKS CORPORATION'S  
UNOPPOSED MOTION TO ENLARGE PAGE LIMIT FOR  
MOTION TO DETERMINE AWARD OF ATTORNEYS' FEES AND COSTS**

Plaintiff Havana Docks Corporation (“Havana Docks”) moves unopposed to enlarge its page limit to 40 pages for its forthcoming motion to determine award of attorneys’ fees and costs.

1. As an element of damages, Havana Docks is entitled to an award of court costs and reasonable attorneys’ fees. *See* 22 U.S.C. § 6082(a)(1)(A)(ii).

2. Havana Docks’ deadline to file its motion for attorneys’ fees and costs is November 4, 2022. (ECF No. 438.)

3. At the September 21, 2022, status conference the Court directed the parties to attempt to agree on the amount of fees and costs through the conferral procedure outlined in Southern District of Florida Local Rule 7.3.

4. Havana Docks served the Defendants with its time sheets and costs on October 7 and 12, 2022.

5. Since then, Havana Docks attempted to confer with the defendants on numerous occasions to understand if there are any objections to the undersigned’s rates, hours expended, or costs.

6. Yesterday afternoon, Defendants relayed that they are available to confer about Havana Docks attorneys’ fees and costs after 4 pm tomorrow, November 2, 2022.

7. To date, Defendants have not provided any objections or topics to confer about. As a result, Havana Docks does not know whether the Defendants dispute the reasonableness of the undersigned’s hourly rates, the hours they expended litigating these cases, or the costs they incurred.

8. Considering the deadline to file the motion for attorneys' fees and costs is this Friday, in an abundance of caution, Havana Docks is preparing its motion under the assumption that the Defendants will dispute all aspects of it.

9. Based on that assumption, Havana Docks requires an additional 20 pages to brief the reasonableness of the undersigned billing rates, the number of hours expended, and the costs incurred in the cases over the approximately three and a half years of litigation.

10. Before filing this motion, the undersigned conferred with counsel for Defendants and is authorized to represent that the Defendants do not oppose the requested enlargement provided that Plaintiff agrees to Defendants having a corresponding increase in their page limit. Plaintiff has no opposition.

For the foregoing reasons, Havana Docks respectfully requests that the Court grant this motion and permit it to file a forty-page motion for attorneys' fees and costs.

Dated: November 1, 2022.

Respectfully submitted,

**COLSON HICKS EIDSON, P.A.**

255 Alhambra Circle, Penthouse

Coral Gables, Florida 33134

Telephone: (305) 476-7400

Facsimile: (305) 476-7444

E-mail: [eservice@colson.com](mailto:eservice@colson.com)

By: s/ Roberto Martínez

Roberto Martínez

Florida Bar No. 305596

[Bob@colson.com](mailto:Bob@colson.com)

Stephanie A. Casey

Florida Bar No. 97483

scasey@colson.com

Zachary A. Lipshultz  
Florida Bar No. 123594

zach@colson.com

Thomas A. Kroeger  
Florida Bar No. 19303

tom@colson.com

Aziza F. Elayan-Martínez  
Florida Bar No. 92736

aziza@colson.com

Sabrina S. Saieh  
Florida Bar No. 125290

sabrina@colson.com

– and –

**MARGOL & MARGOL, P.A.**

2029 3<sup>rd</sup> Street North  
Jacksonville Beach, Florida 32250  
Telephone: (904) 355-7508  
Facsimile: (904) 619-8741

Rodney S. Margol  
Florida Bar No. 225428  
Rodney@margolandmargol.com

*Attorneys for Plaintiff Havana Docks Corporation*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court. I also certify that the foregoing document is being served on this 1<sup>st</sup> day of November on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner.

By: s/ Roberto Martínez  
Roberto Martínez

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

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

CARNIVAL CORPORATION,  
Defendant.

---

Case No. 19-cv-21724  
BLOOM/MCALILEY

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

MSC CRUISES SA, et al.,  
Defendants.

---

Case No. 19-cv-23588  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
Defendant.

---

Case No. 19-cv-23590  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

NORWEGIAN CRUISE LINE HOLDINGS, LTD.,  
Defendant.

---

Case No.: 19-cv-23591  
BLOOM/LOUIS

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO ENLARGE PAGE  
LIMIT FOR MOTION TO DETERMINE AWARD OF ATTORNEYS' FEES AND  
COSTS**

This matter is before the Court on Plaintiff Havana Docks Corporation's ("Havana Docks") unopposed motion to enlarge page limit for motion to determine award of attorneys' fees and costs. (ECF No. \_\_.) Having considered the motion and the record in this case, the motion (ECF No. \_\_) is **GRANTED**. The page limit for Havana Docks' motion to determine award of attorneys' fees and costs is enlarged to 40 pages.

**DONE AND ORDERED**, in Chambers at Miami, Florida on November \_\_, 2022.

---

Beth Bloom  
United States District Judge