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,
MSC CRUISES SA CO, and
MSC CRUISES (USA) INC.,

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.: 19-23591
BLOOM/LOUIS

NOTICE OF FILING INDEX OF EXHIBITS CITED IN PLAINTIFF'S STATEMENT OF MATERIAL FACTS IN SUPPORT OF OMNIBUS MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANTS

Plaintiff, by and through undersigned counsel, hereby files this Notice of Filing Index of Exhibits Cited in Plaintiff's Statement of Material Facts in Support of Omnibus Motion for Summary Judgment Against Defendants [D.E. 337] as required by this Court's Amended Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge [D.E.29].

Docket Entry Number	**Exhibit Number**	**Description of Exhibit**
318-1	1	Transcript of and Exhibits to the Deposition of Jerry Johnson in his capacity as Plaintiff's Rule 30(b)(6) designee in *Havana Docks Corporation v. Carnival Corporation*, dated November 24, 2020
318-2	2	Transcript of and Exhibits to the Deposition of Jerry Johnson in his capacity as Plaintiff's Rule 30(b)(6) designee in *Havana Docks Corporation v. MSC*, dated December 15, 2020
318-3	3	January 15, 2021 Declaration of Jerry Johnson in *Havana Docks Corporation v Norwegian Cruise Line Holdings*
318-4	4	Transcript of and Exhibits to the Deposition of Michael "Micky" Meir Arison in *Havana Docks Corporation v Carnival Corporation*, dated May 4, 2021
318-5	5	July 9, 2018 Document titled "Evaluation of the possibilities of Nipe Bay for developing a Cruise Port for Modern Cruise Ships" (HavanaDocks 396222-227 CONFIDENTIAL)

318-6	6	April 17, 2019 Email re Cuba announcement with new restrictions and sanctions (HavanaDocks 475791 CONFIDENTIAL)
318-7	7	April 17, 2019 Email re Cuba (HavanaDocks 388212 CONFIDENTIAL)
318-8	8	February 22, 2019 Letter to the Honorable Michael R. Pompeo (NCLH_23591 00111666-667)
318-9	9	March 19, 1911 Decree No. 184 (certified translation and original)
318-10	10	Form 666 submitted to Foreign Claims Settlement Commission (FCSC 00272-275) (HDC 001861-1864)
318-11	11	November 1 to November 13, 1960 Havana Docks Corporation Summary of Operations (HDC 002455)
318-12	12	June 29, 1921 Lease between Port of Havana Docks Company and United Fruit Company (HDC 004343-4357 CONFIDENTIAL)
318-13	13	July 1, 1921 Four Party Agreement between Havana Docks Company, Porto f Havana Docks Company, United Fruit Company and Old Colony Trust Company (HDC 004358-4361 CONFIDENTIAL)
318-14	14	July 1, 1921 Old Colony Trust Company Principal Indenture (HDC 004362-4377 CONFIDENTIAL)
318-15	15	February 16, 1922 Havana Docks Corporation Directors Meeting Minutes (HDC 004398-4402 CONFIDENTIAL)
318-16	16	November 22, 1960 Havana Docks Corporation Directors Meeting Minutes (HDC 005303-5306)

318-17	17	July 1, 1921 Old Colony Trust Indenture (HDC 008953-8981 CONFIDENTIAL)
318-18	18	June 1, 1946 The National City Bank of New York Indenture (HDC 008982-9050 CONFIDENTIAL)
318-19	19	February 20, 1922 Turner Construction Contract (HDC 009186-9208 CONFIDENTIAL)
318-20	20	1960 Budget (HDC 009210-9211 CONFIDENTIAL)
318-21	21	May 14, 1918 The Port of Havana Docks Company Meeting Minutes (HDC 010032-10041 CONFIDENTIAL)
318-22	22	November 11, 1910 Decree No. 1022 (HDC 011123-11135)
318-23	23	August 14, 1925 Old Colony Supplement Indenture (HDC 012563-12570)
318-24	24	March 9, 1928 Port of Havana Docks Special Directors Meeting Minutes (HDC 012636 CONFIDENTIAL)
318-25	25	Terms of Farmers' Loan & Trust Company Indenture (HDC 012666–12667 CONFIDENTIAL)
318-26	26	2010 Havana Docks Corporation Annual Report (HDC 013175-13177 CONFIDENTIAL)
318-27	27	August 14, 1917 Articles of Incorporation of Havana Docks Corporation with certificate from Delaware Secretary of State (HDC 018013-018026)
318-28	28	2019 Corporate Income Tax Return of Havana Docks Corporation (HDC 018874-18893)

318-29	29	2021 Certificate of Good Standing from Delaware Secretary of State (HDC 021747-21749)
318-30	30	September 13, 1918 Havana Docks Directors Meeting Minutes (HDC 022587-022596)
318-31	31	May 14, 1918 Havana Docks Directors Meeting Minutes (HDC 022597-022627 CONFIDENTIAL)
318-32	32	August 10, 2021 Declaration of Duncan Hall (Custodian of Records for the Internet Archive's Wayback Machine) (HDC 022628-22647)
318-33	33	August 24, 2021 Havana Docks Directors Meeting Minutes (HDC 023107-23108)
318-34	34	August 24, 2021 Havana Docks Stockholder Meeting Minutes (HDC 023109-23110)
318-35	35	Composite Exhibit: Analyses of Pier Operations and Auxiliary Operations Revenue (HDC 006440, HDC 006423, HDC 006406, HDC 006390, HDC 006374, HDC 006359, HDC 006343, HDC 006327, HDC 006311, HDC 006295, HDC 006279, HDC 006263, HDC 006246, HDC 006229, HDC 006212, HDC 006195, HDC 006179, HDC 006162, HDC 006146, HDC 006130, HDC 006114, HDC 006098, HDC 006082, HDC 006066, HDC 006049, HDC 006033, HDC 006016, HDC 006000, HDC 005984, HDC 005968, HDC 005936, HDC 005920, HDC 005904, HDC 005888, HDC 005872, HDC 005855, HDC 005839, HDC 023122, HDC 023139-23140, HDC 023121, HDC 023137-23138, HDC 023120, HDC 023135-23136, HDC 023119, HDC 023119, HDC 023133-23134, HDC 023131-23132, HDC 023117, HDC 023129, HDC 023130, HDC 023116, HDC 023127, HDC 023128, HDC 023115, HDC 023125, HDC 023126, HDC 023114, HDC 023123-23124, HDC 005271-5276, HDC 005263, HDC 005255-5260, HDC 005247, HDC 005238-5244, HDC 005230, HDC 005222-

		5227, HDC 005214, HDC 005206-5211, HDC 005198, HDC 005190-5195, HDC 005182, HDC 005166, HDC 005157-5163, HDC 005149, HDC 005140-5146, HDC 005132, HDC 005115, HDC 005107-5112, HDC 005090-5096, HDC 009218-9234, HDC 004896-4901, HDC 008047-8060, HDC 011918-11923, HDC 002509-2511, HDC 002518-2519, HDC 011908-11911, HDC 009210-9211 CONFIDENTIAL)
318-36	36	Composite Exhibit: Havana Docks' Pre-Confiscation Financial Reports (HDC 004482-4483, HDC 004516-4517, HDC 004530-4531, HDC 012182-2184, HDC 012214-12215, HDC 012246-12247, HDC 012304-12305, HDC 012364-12365, HDC 12465-12466, HDC 010160-10163, HDC 010255-10258, HDC 010366-10369, HDC 010451-10454, HDC 010560-10563, HDC 010658, HDC 003725-3726, HDC 010736, HDC 003727-3736, HDC 011569-11570, HDC 002968-2971, HDC 002964-2967, HDC 008047-8061 CONFIDENTIAL)
318-37	37	Composite Exhibit: Havana Docks' Post-Certified Claim Financial Reports (HDC 005712-5715, HDC 003208-3214, HDC 008339-8342, HDC 003252-3259, HDC 006514-6515, HDC 008399-8401, HDC 006455-6456, HDC 008621-8624, HDC 011225-11226, HDC 11593-11594, HDC 011394-11397, HDC 011451-11452, HDC 011529-11531, HDC - 11597-1599, HDC 021174-21179, HDC 021191-21193, HDC 021216-21226, HDC 021230, HDC 021247-21251, HDC 021265, HDC 21266-21269, HDC 021270, HDC 021271-21273, HDC 021274-21275, HDC 021276-21279, HDC 021288-21290, HDC 013063-13065, HDC 013095-13096, HDC 013137-13139, HDC 013140, HDC 013123-13127, HDC013175-13177 CONFIDENTIAL)
318-38	38	Composite Exhibit: Havana Docks' Corporation Tax Returns (HDC 008184-8185, HDC 002744-2745, HDC 008192-8210, HDC 008233-8247, HDC 002666-2688, HDC 002405-2414, HDC 002625, HDC 002980-2981, HDC 002982-2986, HDC 003013-3018, HDC 003033-3037, HDC 003065-3070, HDC 003076-3081, HDC 003088, HDC

		018734-18742, HDC 003083-3085, HDC 003110-3115, HDC 018743-18745, HDC 003142-3150, HDC 003193-3207, HDC 003226-3238, HDC 003292-3307, HDC 003309, HDC 008318-8327, HDC 008329-8330, HDC 008379-8388, HDC 008401-8402, HDC 008417-8427, HDC 008594-8604, HDC00 8668-8682, HDC 008645-8656, HDC 008748-8758, HDC 008764, HDC 008702-8715, HDC 011192-11199, HDC 011176-11180, HDC 011282-11294, HDC 011427-11438, HDC 011496-11509, HDC 011566, HDC 021168-021173, HDC 021184-021190, HDC 021208-021215, 021231-021238, HDC 021280-021287, HDC 000342-348, HDC 013082-13088, HDC 013099-13107, HDC 013113-13122, HDC 013213-13223, David Bush subpoena records, HDC 013288-13314, HDC 013316-13350, HDC 013721-13745, HDC 013352-13377, HDC 018836-18864, HDC 018866-18893 CONFIDENTIAL)
318-39	39	Map of Proposed Piers (MSC0000000172)
318-40	40	August 4, 2021 Declaration of Bradley M. Rose
318-41	41	August 30, 2021 Declaration of Bradley M. Rose in Response to Subpoena and Production of Documents, with exhibits
318-42	42	July 16, 1996 William J. Clinton, Statement of Action on Title III of the Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1995
318-43	43	June 20, 2018 Hearing of the Subcommittee of National Security of the House of Representative's Committee on Oversight and Government Reform, "Holding Cuban Leaders Accountable," Report No. 115-87
318-44	44	November 1, 2018 Miami Herald Article re National Security Advisor Ambassador John R. Bolton delivered Remarks on the Trump Administration's Policies in Latin America at Miami-Dade College
318-45	45	January 16, 2019 State Department Announcement re: Suspension of Title III right-of-action for 45 days
318-46	46	February 5, 2019 Email re Confidential and Legally Privileged – Title III Suspension Language (NCLH_23591-00577934-577936 CONFIDENTIAL)

318-47	47	February 11, 2019 Letter to Carnival Corporation (Arison) from Rodney S. Margol, Esq. (HDC 018654-18655)
318-48	48	February 11, 2019 Letter to Carnival Corporation (Perez) from Rodney S. Margol, Esq. (HDC 018650-18651)
318-49	49	February 11, 2019 Letter to MSC from Rodney S. Margol, Esq. (HDC 018658-18659)
318-50	50	February 11, 2019 Letter to Frank Del Rio, Norwegian Cruise Lines Holdings, Ltd. from Rodney S. Margol, Esq. (HDC 01554-1555)
318-51	51	February 11, 2019 Letter to Royal Caribbean International from Rodney S. Margol, Esq. (HDC 01550-1551)
318-52	52	February 11, 2019 Letter to Royal Caribbean Cruise Lines from Rodney S. Margol, Esq.
318-53	53	March 4, 2019 State Department Announcement re: Suspension of Title III right-of-action for an additional 30 days
318-54	54	April 3, 2019 State Department Announcement re: Secretary Pompeo extends the Title III right-of-action suspension until May 1, 2019
318-55	55	Embassy of Switzerland Certification, dated June 12, 1968 (HDC 001718-1720)
318-56	56	April 1, 2015 Video of Frank Del Rio Wharton Business School Interview (HDC-NCL000945)
318-57	57	Transcript of April 1, 2015 Video of Frank Del Rio Wharton Business School Interview
318-58	58	Havana Docks Corporation's Second Amended and Supplemental Answers and Objections to Carnival Corporation's Third Set of Interrogatories, dated August 20, 2021
318-59	59	Update on Potential Cruise Opportunities with Cuba (RCL-Havana0066790-66792 CONFIDENTIAL)

323-1	60	January 23, 2019 Email re Update on Cuba Title III (NCL_23591-00110447-110448)
323-2	61	January 24, 2019 Email re Confidential & Privileged – Title III Suspension (NCLH_23591-0578134-578136 CONFIDENTIAL)
335-1	62	Havana Dock's Corporation's Second Amended and Supplemental Answer and Objections to Defendant's Third Set of Interrogatories dated July 30, 2021
335-2	63	Havana Docks Corporation's Answers and Objections to the First Request for Admissions Served by Defendant dated March 19, 2021

Dated: September 19, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed under seal with the Clerk of the Court. I also certify that the foregoing document will be served on the 20th day of September, 2021, on all counsel of record or pro se parties via electronic mail.

By: s/ *Roberto Martínez*
Roberto Martínez