

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

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

CARNIVAL CORPORATION,  
Defendant.

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Case No. 19-cv-21724  
BLOOM/MCALILEY

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

MSC CRUISES SA, et al.,  
Defendants.

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Case No. 19-cv-23588  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
Defendant.

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Case No. 19-cv-23590  
BLOOM/LOUIS

HAVANA DOCKS CORPORATION,  
Plaintiff,

v.

NORWEGIAN CRUISE LINE HOLDINGS,  
LTD.,  
Defendant.

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

**JOINT NOTICE REGARDING PLAINTIFF'S FEES AND COSTS**

Following a status conference held in this matter on September 21, 2022, the Court directed Plaintiff to file a motion for attorneys' fees and costs by November 4, 2022. The parties agreed to confer pursuant to Local Rule 7.3 to attempt to reach

agreement on the fees and costs to be awarded by the Court as part of the judgments in these cases. The parties have so conferred and reached an agreement as outlined below:

The attorney's fees and costs to be awarded to Havana Docks through September 30, 2022, are as follows, in each individual matter:

- In *Havana Docks Corporation v. Carnival Corporation*, 19-cv-21724: \$3,464,764.69 in attorney's fees, and \$223,766.78 in costs;
- In *Havana Docks Corporation v. MSC Cruises S.A., et al.*, 19-cv-23588: \$2,398,015.65 in fees, and \$245,951.11 in costs;
- In *Havana Docks Corporation v. Royal Caribbean Cruises, Ltd.*, 19-cv-23590: \$2,062,935.8 in fees, and \$233,974.67 in costs; and
- In *Havana Docks Corporation v. Norwegian Cruise Line Holdings, Ltd.*, 19-cv-23591: \$2,817,073.61 in fees, and \$261,002 in costs.

Plaintiff agrees to these sums for the fees and costs incurred up to and including September 30, 2022, and reserves its right to seek recovery of the fees and costs it has and will incur in litigating these cases after October 1, 2022, including through appellate and judgment enforcement proceedings. Defendants, in turn, reserve all rights to challenge any additional fees requested, and preserve all rights to challenge any award of fees should any part of the Court's final judgment be reversed on appeal.

**NOTICE OF ENDORSEMENT**

Pursuant to CM/ECF Administrative Procedure 3J(3), the undersigned certifies that counsel for the Defendants have authorized me to file this joint notice on their behalf with the electronic signature of their counsel affixed hereto.

Dated: November 4, 2022.

Respectfully submitted,

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**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 this 4 November 2022, 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 for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Roberto Martínez  
Roberto Martínez