UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

HAVANA DOCKS CORPORATION,

Plaintiff,

v.

Civil Action No.
19-cv-21724

CARNIVAL CORPORATION d/b/a CARNIVAL CRUISE LINE, a foreign corporation,

Defendant.
_____/

JOINT MOTION TO STAY DISCOVERY PENDING A RULING ON THE MOTION FOR RECONSIDERATION

The Parties jointly request that the Court enter an order staying discovery pending a ruling on Carnival Corporation's ("Carnival") motion for reconsideration. D.E. 65. This Court recently dismissed two cases brought by Plaintiff against MSC Cruises and Norwegian Cruise Lines under Title III of the LIBERTAD Act. *See Havana Docks Corp. v. MSC Cruises SA CO, et al.*, No. 19-cv-23588-BLOOM-Louis (S.D. Fla. Jan. 3, 2020), D.E. 40 and *Havana Docks Corp v. Norwegian Cruise Line Holdings, Ltd.*, No. 19-cv-23591-BLOOM-Louis (S.D. Fla. Jan. 7, 2020), D.E. 42. In light of the dismissal orders in those cases, Carnival has sought reconsideration of the Court's order denying its motion to dismiss. (ECF No. 65.) Due to the present posture of this case, the MSC case and the NCL case, the Parties agree that the prudent course is to stay discovery in this case, including an upcoming hearing before Judge McAliley, (ECF No. 62), until Carnival's motion for reconsideration is adjudicated. (ECF No. 62.) A stay would conserve the Parties' and the Court's time and resources pending determination of Carnival's motion for reconsideration and Plaintiff's ability to proceed before this Court. The Parties agree that if Carnival's motion is denied, they will jointly request an amended scheduling order requesting an enlargement of pre-trial deadlines to ensure that there is ample time for the Parties to complete discovery and develop their cases.

For the foregoing reasons, the Parties respectfully request that the Court enter an order staying discovery until Carnival's motion for reconsideration is resolved.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), counsel for Carnival certifies that he has conferred with opposing counsel, and Plaintiff joins the request for the relief sought herein.

Dated: January 8, 2020

Respectfully submitted,

By: s/ Roberto Martínez
Roberto Martínez
(Florida Bar No. 305596)
Stephanie A. Casey
(Florida Bar No. 97483)
Aziza F. Elayan-Martinez
(Florida Bar No. 92736)
Zachary A. Lipshultz
(Florida Bar No. 123594)
COLSON HICKS EIDSON, P.A.
255 Alhambra Circle, Penthouse
Coral Gables, Florida 33134
Telephone: (305) 476-7400
Facsimile: (305) 476-7444
bob@colson.com
scasey@colson.com
aziza@colson.com
zach@colson.com

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
Rodney@margolandmargol.com

Attorneys for Plaintiff Havana Docks Corporation

By: *s/ Stuart H. Singer*
Stuart H. Singer
(Florida Bar No. 377325)
Evan Ezray
(Florida Bar No. 1008228)
Johnathan Lott
(Florida Bar No. 0116423)
BOIES SCHILLER FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 356-0011
ssinger@bsfllp.com
eezray@bsfllp.com
jlott@bsfllp.com

Pedro A. Freyre
AKERMAN LLP
(Florida Bar No. 192140)
98 SE 7th St., Suite 1100
Miami, Florida 33131
Telephone: (305) 374-5600
Pedro.freyre@akerman.com

George J. Fowler, III
(*Pro Hac Vice*)
Luis Llamas
(Florida Bar No. 89822)
JONES WALKER LLP
201 St. Charles Ave.
New Orleans, LA 70170
Telephone: (504) 582-8752
gfowler@joneswalker.com
llamas@joneswalker.com

Attorneys for Defendant Carnival Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record via the court's CM/ECF System on January 8, 2020.

By:*/s/ Stuart H. Singer*
Stuart H. Singer, Esq.