UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:19-cv-23591-BLOOM/LOUIS

HAVANA DOCKS CORPORATION,

Plaintiff,

vs.

NORWEGIAN CRUISE LINE HOLDINGS LTD.,

Defendant.
_____ /

HAVANA DOCKS' MOTION FOR LEAVE TO
FILE EXHIBITS TO MOTION TO COMPEL (D.E. 128) UNDER SEAL

Pursuant to Local Rule 5.4 of the Southern District of Florida and the protective order governing this case (the "Protective Order," ECF No. 86), Plaintiff Havana Docks Corporation ("Havana Docks") seeks leave to file under seal Exhibits A, G, H, I, J, K, L, N and O to its Motion to Compel Production of Evidence Withheld Under the Attorney-Client Privilege and Work Product Doctrine (the "Motion," ECF No. 128).

Havana Docks publicly filed a notice containing some of the exhibits cited in the Motion. (ECF No. 129.) However, other exhibits were designated confidential by the cruise company defendants[1] or are presumptively confidential under the

[1] Havana Docks reserves the right to seek de-designation of these documents in full following the meet and confer process set out in the protective order.

Protective Order at this juncture, necessitating this request for leave to file those exhibits under seal. The exhibits Havana Docks requests to file under seal are:

- Exhibit A – Norwegian Amended Privilege Log, Attorney Legend and List of Names and Email Domains of Individuals Appearing on the Log
- Exhibit G – Excerpts of Deposition of Lincoln Vidal
- Exhibit H – Declaration of Lincoln Vidal
- Exhibit I – Excerpts of Deposition of Giora Israel
- Exhibit J – Excerpts of Deposition of Arnaldo Perez
- Exhibit K – Declaration of Lawrence Kaye
- Exhibit L – Declaration of Lincoln Vidal
- Exhibit N – Lobbying Entries on Norwegian's Amended Privilege Log
- Exhibit O – Excerpts of Deposition of Frank Del Rio

On January 16, 2021, Havana Docks served on all counsel of record a complete version of all exhibits cited in the Motion, including those it now seeks to file under seal.

Havana Docks takes no position on the duration of any sealing of these records.

Pursuant to Local Rule 7.1(a)(3)(A), the undersigned has conferred with Norwegian regarding the relief sought in this motion, and was advised that Norwegian does not oppos this motion.

Dated: January 18, 2021.

Respectfully submitted,

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Attorneys for Plaintiff Havana Docks Corp.

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 18th day of January, 2021, 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

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[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE TO FILE EXHIBITS TO MOTION TO COMPEL UNDER SEAL

Before the Court is Plaintiff Havana Docks Corporation's motion for leave to file exhibits to motion to compel (D.E. 128) under seal (the "Motion," ECF No. __). Having considered the Motion and the record in this case, the Court **grants** the Motion (ECF No. ___). Havana Docks may file under seal Exhibits A, G, H, I, J, K, L, N and O to its Motion to Compel Evidence Withheld under the Attorney Client Privilege and Work Product Doctrine.

Done and ordered, in Chambers, at Miami, Florida on January ____, 2021.

_____
Hon. Lauren F. Louis
United States Magistrate Judge