UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:20-cv-20078-RNS

MARIA DOLORES CANTO MARTI, as personal representative of the Estates of Dolores Marti Mercade and Fernando Canto Bory,

Plaintiff,

v.

IBEROSTAR HOTELES Y APARTAMENTOS S.L., a Spanish limited liability company,

Defendant.

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PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Maria Dolores Canto Marti ("Plaintiff"), by and through undersigned counsel, hereby files supplemental authority in support of her Renewed Motion to Lift Stay and if Denied, Motion for Certification of Order Under 28 U.S.C. § 1292(B) [D.E. 32] (the "Motion"). Since filing Plaintiff's Reply in support of her Motion on March 24, 2021 [D.E. 35], Plaintiff has learned of the below ***five*** other actions involving Helms-Burton Act claims against EU defendants that have participated in their respective actions by, at least, filing a motion to dismiss. The court records reflect that such EU defendants have not suffered any sanctions by the EU or the EU Commission for doing so:

1) *Banco Nunez v. Societe Generale*, No. 1:19-cv-22842-DPG (S.D. Fla.) transferred to No. 1:20-cv-00851-KMW-KNF (S.D.N.Y); [1]
2) *Del Valle et al. v. Trivago GMBH et al.*, No. 1:19-cv-22619-BB (S.D. Fla.);[2]

[1] In *Banco Nunez v. Societe Generale*, No. 1:19-cv-22842-DPG (S.D. Fla.), French defendant Societe Generale, S.A. filed a motion to dismiss [D.E. 29] and other filings in *Banco Nunez v. Societe Generale*, No. 1:20-cv-00851-KMW-KNF (S.D.N.Y).
[2] In *Del Valle et al. v. Trivago GMBH et al.*, No. 1:19-cv-22619-BB (S.D. Fla.), Dutch defendant Booking.com B.V. filed a motion to dismiss [D.E. 52] and other filings.

3) *Mata et al. v. Expedia Inc. et al.*, No. 1:19-cv-22529-FAM (S.D. Fla.);[3]
4) *Echevarria et al. v. Trivago GMBH et al.*, No. 1:19-cv-22620-FAM (S.D. Fla.);[4] and
5) *Pujol Moreira et al. v. Societe Generale et al.*, No. 1:20-cv-09380-JMF (S.D.N.Y).[5]

Dated: March 26, 2021

Respectfully submitted,

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[3] In *Mata et al v. Expedia Inc. et al.*, No. 1:19-cv-22529-FAM (S.D. Fla.), Spanish defendant Melia Hotels International, S.A. filed a motion to dismiss [D.E. 70] and other filings; and Dutch defendant Booking.com B.V. filed a motion to dismiss [D.E. 78] and other filings.
[4] In *Echevarria et al. v. Trivago GMBH et al.*, No. 1:19-cv-22620-FAM (S.D. Fla.), Dutch defendant Booking.com B.V. filed a motion to dismiss [D.E. 37] and other filings.
[5] In *Pujol Moreira et al. v. Societe Generale et al.*, No. 1:20-cv-09380-JMF (S.D.N.Y), French defendant Societe Generale, S.A. filed a motion to dismiss [D.E. 25] and other filings.