UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ODETTE BLANCO DE FERNANDEZ
née BLANCO ROSELL, *et al.*

CASE NO.: 1:21-cv-20443-GAYLES

Plaintiffs,

v.

CROWLEY MARITIME CORPORATION *et al.*,

Defendants.
_____/

NOTICE OF PENDING, REFILED, RELATED OR SIMILAR ACTION

In accordance with Local Rule 3.8 Plaintiffs respectfully submit this Notice of Pending, Refiled, Related or Similar Action. This action is related to a prior-filed, lower-numbered, similar action captioned *Odette Blanco de Fernandez née Blanco Rosell, et al., v. Seaboard Marine, Ltd.*, Case No. 1:19-cv-23590-BB (Bloom, J.) ("*Seaboard* Action").

The subject matter of this action is materially similar to the *Seaboard* Action. *See* IOP 2.15. Odette Blanco de Fernandez née Blanco Rosell is a plaintiff in both this action and in the *Seaboard* Action. Both this action and the *Seaboard* Action are actions to recover damages and interest under the Cuban Liberty and Democratic Solidarity (LIBERTAD) Act of 1996, codified at 22 U.S.C. § 6021, et seq. (the "Helms-Burton Act" or "Act") for trafficking in property which was confiscated by the Cuban Government on or after January 1, 1959, and as to which plaintiffs in both actions own claims. The property which was confiscated by the Cuban Government on or after January 1, 1959, and as to which plaintiffs in both action own claims ("Confiscated Property"), is the same in both actions.

Because this action and the *Seaboard* Action involve the same plaintiff, the same subject matter, the same statutory causes of action based on the ownership of claims to the same Confiscated Property, the same method of calculation of damages, and materially similar allegations, the disposition of this action would "entail the unnecessary duplication of judicial labor" if heard separately from the *Seaboard* Action.

Dated: February 4, 2021

Respectfully submitted,

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