UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:19-cv-21724-BLOOM/MCALILEY

HAVANA DOCKS CORPORATION,

Plaintiff,

vs.

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

Defendant.
_____ /

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO CARNIVAL'S MOTION FOR RECONSIDERATION

Plaintiff Havana Docks Corporation ("Havana Docks") moves for an extension of time to respond to the motion for reconsideration (the "Motion," ECF No. 63) filed by Carnival Corporation ("Carnival") until January 31, 2020, as follows.

1. On January 7, 2020, Carnival moved for reconsideration of the Court's prior order denying its motion to dismiss. (ECF No. 63.) The basis for the Motion is the Court's orders dismissing Havana Docks' cases against MSC Cruises ("MSC") and Norwegian Cruise Lines ("NCL"), dated January 3, 2020 and January 7, 2020, respectively. Havana Docks' deadline to respond to the Motion is presently January 21, 2020.

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2. The undersigned are conferring internally and with Plaintiff about how to proceed with this case and the others brought against MSC, NCL and Royal Caribbean Cruise Lines in light of the Court's orders.

3. The earliest deadline for any potential next steps in these cases is January 31, 2020, which is Plaintiff's deadline to move for reconsideration in the MSC case.

4. Havana Docks response to the Motion will be affected by how it proceeds with the MSC case.

5. To ensure consistent positions are taken in all four cases, Plaintiff requests a ten-day enlargement of time to respond to Carnival's motion for reconsideration until January 31, 2020.

6. This motion is made in good faith and not for the purposes of delay, and will not prejudice Carnival.

For the foregoing reasons, Havana Docks respectfully requests a ten-day extension of time, up to and including January 31, 2020, to file its response brief to Carnival's motion for reconsideration (ECF No. 63).

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), the undersigned certifies that he conferred with opposing counsel who states that Carnival takes no position on this motion.

DATED: January 8, 2020.

Respectfully submitted,

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Attorneys for Plaintiff Havana Docks Corporation

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 8 January 2020, 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 EXTENSION OF TIME TO RESPOND TO CARNIVAL'S MOTION FOR RECONSIDERATION

Before the Court is motion for extension of time to respond to Carnival's motion for reconsideration (the "Motion," ECF No. __). Having considered the Motion and the record in this case, the Court finds good cause exists for the requested enlargement and **grants** the Motion (**ECF No. ___**) as follows.

1. The Plaintiff's deadline to respond to Carnival's motion for reconsideration (ECF No. 63) is now January 31, 2020.

Done and ordered, in Chambers, at Miami, Florida on January __, 2020.

_____
Hon. Beth Bloom
United States District Judge