

EXHIBIT “2”

Filed Under Seal

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 19-23591-CIV-BLOOM/Louis

HAVANA DOCKS CORPORATION,

Plaintiff,

-vs-

NORWEGIAN CRUISE LINE
HOLDINGS, LTD.,

Defendant.
_____ /

VIDEO-RECORDED DEPOSITION OF
CORPORATE REPRESENTATIVE HUGO M. CANCIO

(Pages 1 through 94)

November 12, 2020
9:31 a.m. - 12:13 p.m.

Remotely Via Zoom Videoconference
Miami, Florida

Examination of the witness stenographically taken
before: Lance W. Steinbeisser, RPR
NCRA-Certified Stenographic Reporter

Page 2

REMOTE APPEARANCES:

On behalf of the Plaintiff:

COLSON HICKS EIDSON
 BY: ROBERTO MARTINEZ, ESQUIRE
 bob@colson.com
 and
 STEPHANIE A. CASEY, ESQUIRE
 scasey@colson.com
 255 Alhambra Circle, Penthouse
 Coral Gables, Florida 33134
 305-476-7400

On behalf of the Plaintiff:

MARGOL & MARGOL, P.A.
 BY: RODNEY S. MARGOL, ESQUIRE
 rodney@margolandmargol.com
 2029 3rd Street North
 Jacksonville Beach, Florida 32250-7429
 904-355-7508

On behalf of the Defendant:

HOGAN LOVELLS US LLP
 BY: RICHARD C. LORENZO, ESQUIRE
 richard.lorenzo@hoganlovells.com
 and
 DANIEL BALMORI, ESQUIRE
 daniel.balmori@hoganlovells.com
 600 Brickell Avenue, Suite 2700
 Coral Gables, Florida 33131-3085
 305-459-6652

Page 3

1 On behalf of the Defendant:
 2 NORWEGIAN CRUISE LINE
 3 BY: DANIEL S. FARKAS, ESQUIRE
 4 dfarkas@ncl.com
 5 and
 6 LINCOLN M. VIDAL, ESQUIRE
 7 lvidal@ncl.com
 8 7665 Northwest 19th Street
 9 Miami, Florida 33126-1201
 10 305-436-4690

11 On behalf of the Witness:

12 COLE, SCOTT & KISSANE, P.A.
 13 BY: BARRY A. POSTMAN, ESQUIRE
 14 barry.postman@csklegal.com
 15 222 Lakeview Avenue, Suite 120
 16 West Palm Beach, Florida 33401-6146
 17 561-383-9234

18 VIDEOGRAPHER: Tony Barlow

19 ALSO PRESENT: Ellie Futterman
 20 Jerry Johnson
 21
 22
 23
 24
 25

Page 4

1 INDEX TO EXAMINATIONS
 2 WITNESS PAGE
 3 HUGO M. CANCIO
 4 Direct Examination By Ms. Casey..... 6

5 INDEX TO EXHIBITS

6 EXHIBIT DESCRIPTION PAGE
 7 Plaintiff 38Depo notice 9
 8 Plaintiff 39Master Letter Agreement 19
 9 Plaintiff 40First Amendment to Master 23
 10 Letter Agreement
 11 Plaintiff 41Contrato de Servicio 66
 12

13 INDEX TO CERTIFICATES AND LETTERS
 14 PAGE
 15 CERTIFICATE OF OATH.....91
 16 CERTIFICATE OF REPORTER.....92
 17 READ & SIGN LETTER TO WITNESS.....93
 18 ERRATA SHEET.....94
 19
 20
 21
 22
 23
 24
 25

Page 5

1 THE VIDEOGRAPHER: Good morning. We are
 2 on the record for the video deposition of Hugo
 3 Cancio taken in the matter of Havana Docks
 4 Corporation versus Norwegian Cruise Line
 5 Holdings Ltd. Today is November 12, 2020, and
 6 the time is 9:30 a.m. This deposition is
 7 being conducted remotely via Zoom. The court
 8 reporter is Lance Steinbeisser, and the
 9 videographer is Tony Barlow, myself.

10 Will counsel please introduce themselves
 11 after which the court reporter will swear in
 12 the witness.

13 MS. CASEY: Good morning. This is
 14 Stephanie Casey on behalf of Havana Docks
 15 Corporation. With me today -- we are via
 16 Zoom, and calling in today are Bob Martinez,
 17 Ellie Futterman, who is a paralegal in our
 18 office, Rodney Margol, and Jerry Johnson is
 19 from Havana Docks Corporation. I think I have
 20 everyone.

21 MR. LORENZO: Good morning. Richard
 22 Lorenzo with the law firm of Hogan Lovells on
 23 behalf of Norwegian Cruise Lines Holdings Ltd.
 24 I'm joined today by my colleague Daniel
 25 Balmori, and we're also joined by Dan Farkas,

Page 6

1 Norwegian's general counsel, and Lincoln
2 Vidal, Norwegian's deputy general counsel.
3 Good morning, all. Thank you.
4 MR. POSTMAN: Good morning. My name is
5 Barry Postman. I'm here on behalf of Hugo and
6 Fuego Industries from Cole Scott & Kissane,
7 and I'm by myself today.
8 Thereupon--
9 HUGO M. CANCIO
10 was duly administered the oath: Do you swear or
11 affirm that the testimony you are about to give in
12 this cause will be the truth, the whole truth and
13 nothing but the truth?
14 THE WITNESS: Yes, I do.
15 DIRECT EXAMINATION
16 BY MS. CASEY:
17 Q. Mr. Cancio, good morning. How are you,
18 sir?
19 A. **Good morning. How are you?**
20 Q. Good.
21 Sir, just for the record, could you give
22 me your full name and spell your last name, please.
23 A. **Yes. My full name is Hugo, middle**
24 **initial M, last name Cancio, C-A-N-C-I-O.**
25 Q. And, sir, where are you employed?

Page 7

1 A. **Fuego Enterprises.**
2 Q. Are you employed by Norwegian Cruise
3 Line Holdings Ltd., the defendant in this action?
4 A. **No.**
5 Q. And from time to time in this deposition
6 I'm going to be referring to the Defendant
7 Norwegian Cruise Line Holdings Ltd. as either NCL
8 or Norwegian. Is that okay with you?
9 A. **That is fine.**
10 Q. Okay. You'll understand what I'm
11 talking about, hopefully.
12 Sir, have you had your deposition taken
13 before?
14 A. **Yes, I have.**
15 Q. Okay. In what context?
16 A. **I was a plaintiff in a lawsuit.**
17 Q. And was that here in Florida?
18 A. **Yes.**
19 Q. What kind of lawsuit?
20 A. **A civil lawsuit.**
21 Q. And do you know if it was in circuit
22 court or county court?
23 A. **I don't remember.**
24 Q. Was there a lot of money at issue or not
25 that much money at issue?

Page 8

1 A. **A lot of money at issue.**
2 Q. Okay. So it probably was circuit court.
3 And what was the nature of the lawsuit?
4 A. **We filed a lawsuit against the Homestead**
5 **Speedway for a breach of contract.**
6 Q. And, sir, you were personally named as a
7 plaintiff in the lawsuit, or was it one of your
8 companies?
9 A. **No, it was one of the companies that I**
10 **represented.**
11 Q. Okay. And was that Fuego Enterprises,
12 sir?
13 A. **No.**
14 Q. What was the plaintiff? What was the
15 entity?
16 A. **I don't remember the name of the**
17 **company. It's been many years, but Louis Aries was**
18 **one of the plaintiffs and --**
19 Q. And what's your relationship to him?
20 A. **We were partners.**
21 Q. And when did this deposition occur?
22 A. **To the best of my recollection, it's**
23 **over 15, 16 years ago.**
24 Q. Besides this deposition 15 or 16 years
25 ago, have you been deposed in any other action?

Page 9

1 A. **No.**
2 Q. Okay. So just for the benefit of time
3 passing, I'll go through some of the sort of rules,
4 although I'm sure your attorneys have covered this
5 already with you.
6 You are testifying today under oath.
7 I'm going to be asking you questions. You're going
8 to be answering. If you can wait until I finish
9 asking my question so that you can answer, our
10 court reporter will be able to get everything down.
11 And if you could try -- I know sometimes it's hard
12 to not give a uh-huh or, you know, a shake of the
13 head or a nod of the head because that makes it
14 difficult for the court reporter to take down;
15 okay?
16 A. **I understand.**
17 Q. If I ask any question, sir, that you do
18 not understand, please let me know, and I'll
19 restate it. I won't be offended. And if I make
20 any misstatement or say anything that you don't
21 think is correct, please let me know as well, and
22 I'll try to either give you a better question or
23 correct the statement; okay?
24 A. **Okay.**
25 **(Plaintiff Exhibit 38 was marked for**

Page 10

1 **identification.)**
2 BY MS. CASEY:
3 Q. All right. Sir, I'm going to show you
4 what I think will be marked Plaintiff's 38
5 sequentially from the last deposition -- someone
6 correct me if that's incorrect -- which will be the
7 Plaintiff's Re-Notice of Deposition.
8 And, sir, just let me know when you can
9 pull that up.
10 MR. POSTMAN: Is this the one that you
11 sent yesterday?
12 MS. CASEY: It is.
13 MR. POSTMAN: He may not have seen it,
14 so that you know, because it came in yesterday
15 but --
16 BY MS. CASEY:
17 Q. Okay. Well, sir, I'll represent to you
18 that this is identical to the notice of deposition
19 except that the date is different because it
20 reflects today's date, but I'm anticipating that
21 you're going to tell me that you have not seen this
22 document before.
23 **A. I have not.**
24 Q. Okay. So, Ellie, could you put up the
25 original notice, please.

Page 11

1 MS. FUTTERMAN: Steph, that's going to
2 take me a minute. I have the one from
3 yesterday that we sent, so.
4 BY MS. CASEY:
5 Q. Okay. Well, how about this? If you,
6 sir, go to page 4 of the document that is in front
7 of you, Plaintiff's Exhibit 38. Let me know when
8 you get there.
9 MR. POSTMAN: You said page 4?
10 MS. CASEY: Yeah, page 4 which is
11 Exhibit 1.
12 MR. POSTMAN: Okay.
13 BY MS. CASEY:
14 Q. Okay. Have you seen this before? And I
15 will represent to you that it's the exact same
16 exhibit that was on the notice of deposition, the
17 original one. Have you seen this --
18 **A. Yes, I have.**
19 Q. Okay. And, sir, when did you see this
20 Exhibit 1 before?
21 **A. I believe a couple of days ago.**
22 Q. Sir, do you understand that Norwegian
23 has selected you to testify under oath today on
24 Norwegian's behalf as to certain topics identified
25 in this notice?

Page 12

1 **A. Yes, I do.**
2 Q. All right. And you understand that
3 Norwegian has authorized you to speak today as its
4 representative?
5 **A. Yes.**
6 Q. And you are going to testify under oath
7 today as to four topics; is that correct?
8 **A. Yes.**
9 Q. All right. And those topics are topics
10 II(B), IV(B), IV(D), and V(H). Do I have that
11 right?
12 **A. Yes.**
13 MR. LORENZO: Stephanie, I think it's
14 V(I) which is on page 8.
15 BY MS. CASEY:
16 Q. Well, I thought it was V(H), but that's
17 okay. I can cover V(I) too.
18 So, sir, what did you do to prepare for
19 this deposition today?
20 **A. Met with the lawyers from Norwegian and**
21 **my personal attorney.**
22 Q. When did you do that?
23 MR. POSTMAN: Just give the date.
24 **A. I believe it was Monday, Tuesday, and**
25 **yesterday.**

Page 13

1 BY MS. CASEY:
2 Q. How much time did you spend with your
3 attorneys on Monday?
4 MR. POSTMAN: So I'm going to object and
5 instruct the witness not to answer that
6 question in terms of how much time he spent
7 with his counsel.
8 I guess I need to give my name if I'm
9 doing the objecting. Does that make sense for
10 the court reporter since we're not in the same
11 room? This is Barry Postman on his behalf.
12 MS. CASEY: Mr. Postman, are you
13 defending this deposition on behalf of
14 Norwegian Cruise Lines?
15 MR. LORENZO: Richard Lorenzo is. I
16 make the same objection.
17 MR. POSTMAN: But just so the record --
18 I want to answer the question, since you've
19 asked it. No. I thought I said this at the
20 beginning. I'm representing the witness
21 individually as well as the corporate entity
22 Fuego Industries. And although he's a
23 corporate rep, he's also a person.
24 So on his behalf, he has rights, and I'm
25 asserting that objection. I guess Norwegian

Page 14

1 is too. But on his behalf, I'm asserting that
2 objection.
3 MR. LORENZO: Norwegian is asserting
4 that objection. Thanks.
5 MS. CASEY: And just so that the record
6 is clear, this portion of the deposition is
7 the Rule 30(b)(6) portion of the deposition.
8 THE STENOGRAPHER: Sorry. Can I just
9 add? If there is going to be two people
10 objecting -- you're not on the camera --
11 you're going to have to identify yourself
12 because it's really difficult for me to
13 identify your voices when I just hear voices.
14 BY MS. CASEY:
15 Q. So, sir, on Monday, how much time did
16 you spend with your attorneys meeting in
17 preparation for this deposition?
18 MR. LORENZO: Objection.
19 MR. POSTMAN: Join. And I instruct him
20 not to answer.
21 MS. CASEY: And, sir, Mr. Postman,
22 you're instructing him not to answer based on
23 what?
24 MR. POSTMAN: The attorney-client work
25 product privilege. I think you're entitled --

Page 15

1 you've asked me -- I'm happy to have the
2 conversation or just let this go --
3 MS. CASEY: No, I just want it on the
4 record.
5 BY MS. CASEY:
6 Q. And, sir, without telling me the
7 substance of any communication, can you tell me how
8 much time you spent with your attorneys on Tuesday
9 in preparation for this deposition?
10 MR. LORENZO: The same objection.
11 Objection. Attorney-client privilege.
12 MR. POSTMAN: Join, and I'm instructing
13 the witness not to answer.
14 MS. CASEY: What is the grounds?
15 MR. POSTMAN: It's the same grounds,
16 ma'am. Attorney-client privilege and work
17 product privileges.
18 BY MS. CASEY:
19 Q. And, sir, yesterday, without giving me
20 the substance of any communications that you had
21 with your attorneys, yesterday when you met with
22 your attorneys, how much time did you spend with
23 them in preparation for this deposition --
24 MR. LORENZO: Objection.
25 Attorney-client privilege. Work product.

Page 16

1 MR. POSTMAN: Join, and instruct him not
2 to answer. The same grounds.
3 BY MS. CASEY:
4 Q. Sir, in preparing for this deposition,
5 did you review the deposition testimony given by
6 Mr. Mario Parodi on behalf of Norwegian Cruise
7 Lines on November 5, 2020?
8 A. No.
9 Q. Did you review any other documents in
10 preparation for your deposition today?
11 A. No.
12 Q. Except for the three meetings that you
13 had with your attorneys, did you do anything else
14 in preparation for this deposition?
15 A. No.
16 Q. Did you speak with anybody from
17 Norwegian Cruise Line in preparation for this
18 deposition?
19 A. No.
20 Q. Sir, did you bring any documents or
21 notes with you today to assist you in giving your
22 testimony today?
23 A. No.
24 Q. All right. And if at any point in time
25 during this deposition you need to refer to a

Page 17

1 document, that's fine, but please let me know what
2 document you're referring to; okay?
3 A. Okay.
4 Q. Sir, what is your relationship with
5 Norwegian Cruise Line?
6 A. I have a consultant agreement, and my
7 company has an agreement to provide shore
8 excursions for Norwegian Cruise Lines.
9 Q. What company is that, sir?
10 A. Fuego Enterprises.
11 Q. And do you have any other companies
12 beyond Fuego Enterprises?
13 A. Yes.
14 Q. What companies are those?
15 A. Well, I do not. I -- I have to go back.
16 I do not. Those companies are wholly owned
17 subsidiaries of Fuego; so I don't personally own
18 those companies.
19 Q. And Fuego Enterprises is a corporation?
20 A. Yes, it is.
21 Q. And what are the subsidiaries of Fuego
22 Enterprises, Inc.?
23 A. OnCuba Travel.
24 Q. Is there another business entity called
25 Art Cuba?

Page 18

1 **A. Can you repeat the name?**
2 Q. Art Cuba.
3 **A. I -- I don't know that company.**
4 Q. And beyond Fuego Enterprises, is there
5 any other entity through which you provide services
6 to Norwegian?
7 **A. No.**
8 Q. Do you have a personal agreement, an
9 agreement between you individually and Norwegian
10 Cruise Line?
11 **A. I do not.**
12 Q. Who at NCL made the decision to retain
13 Fuego Enterprises?
14 MR. LORENZO: Objection to the form.
15 MR. POSTMAN: If you know the answer,
16 you can answer.
17 BY MS. CASEY:
18 Q. You can answer. I'm sorry. I was going
19 to say as we go through this process, you'll see
20 that your attorneys will state objections. And
21 unless they instruct you not to answer the
22 question, you can go ahead and answer.
23 THE STENOGRAPHER: I'm sorry. I didn't
24 get an answer because there's papers moving in
25 the background.

Page 19

1 **A. I don't know how those decisions are**
2 **made internally, but I believe it was Mr. Frank**
3 **Del Rio.**
4 BY MS. CASEY:
5 Q. When did you first -- I'm sorry.
6 Scratch that?
7 When did Fuego Enterprises first enter
8 into a contract for services with Norwegian Cruise
9 Line?
10 **A. I don't remember the exact date, but it**
11 **might have been somewhere sometime in 2016.**
12 MS. CASEY: Ellie, can you pull up P9,
13 please.
14 MS. FUTTERMAN: Steph, this would be
15 Depo Exhibit 39.
16 MS. CASEY: Thank you.
17 (Plaintiff Exhibit 39 was marked for
18 identification.)
19 BY MS. CASEY:
20 Q. Sir, just let me know when you've had an
21 opportunity to look at that.
22 Have you had an opportunity to look at
23 it?
24 **A. I have the document in front of me, yes.**
25 Q. And, sir, is this the first contract

Page 20

1 that was entered into between Fuego Enterprises,
2 Inc., and Norwegian Cruise Line Holdings Ltd.?
3 **A. The date.**
4 Q. The date is on the first page.
5 **A. To the best of my recollection, yes,**
6 **although it may have been another agreement prior**
7 **to this.**
8 Q. We have not received any agreement prior
9 to this which is the reason that I'm asking.
10 Do you know if there was an agreement, a
11 written agreement, prior to this January 27, 2017,
12 agreement?
13 **A. I don't recall. There may have been.**
14 Q. Okay. And if you go to page 13 of this
15 agreement -- and I'm referring to the page numbers
16 that are at the top of the document.
17 **A. Yes.**
18 Q. All right. And, sir, is that your
19 signature there --
20 **A. Yes.**
21 Q. -- under Hugo Cancio, President/CEO?
22 **A. Yes.**
23 Q. And is that Mr. Del Rio's signature
24 under President/CEO Norwegian Cruise Line Holdings
25 Ltd.?

Page 21

1 **A. I believe so.**
2 Q. Now, sir, besides you, did anybody else
3 at Fuego Enterprises, Inc., provide services to
4 Norwegian pursuant to this master letter agreement?
5 **A. No. Well --**
6 Q. Did --
7 **A. Well, let me rephrase that. Ariel**
8 **Machado, vice-president of my company, which is --**
9 **he worked on behalf of Fuego, but he may be listed**
10 **in one of the agreements.**
11 Q. And were there any other employees of
12 Fuego Enterprises, Inc., besides you, sir, and
13 Ariel Machado?
14 **A. No.**
15 Q. And, sir, if you go to just the first
16 page, there's an Item 1, the first provision there,
17 it says "scope of work." Do you see that, sir?
18 **A. Yes, I do.**
19 Q. All right. And under that there's a
20 Subsection A, a Subsection B and a Subsection C.
21 And if you look at Subsection B, it refers to a
22 Schedule 1 and a Subsection C that refers to a
23 Schedule 2. Do you see that?
24 **A. Yes.**
25 Q. Okay. And then if you, sir, go to

Page 22

1 page 14 of this document, that's Schedule 1. Do
2 you see that?
3 **A. I'm looking.**
4 Q. You don't see it?
5 **A. Yeah, yeah, got it.**
6 Q. Okay. And, sir, is this an accurate
7 list of the services that Fuego Enterprises
8 provided for Norwegian while this agreement was in
9 effect?
10 **A. Yes.**
11 Q. Are there services that were listed in
12 Schedule 1 and 2 that Fuego Enterprises did not end
13 up providing?
14 **A. Can you repeat the question, please?**
15 Q. Are there services that were listed
16 under Schedule 1 and 2 in the master letter
17 agreement that Fuego Enterprises ended up not
18 actually providing, to your recollection?
19 **A. No.**
20 Q. And, sir, is it fair to say that you
21 pursuant to this agreement were acting as an agent
22 for Norwegian with respect to dealings with the
23 Cuban Government?
24 **A. A consultant, yes.**
25 Q. What difference do you see as between an

Page 23

1 agent and a consultant, if any?
2 **A. I would just rather use the word**
3 **"consultant."**
4 MS. CASEY: Okay. And then, Ellie, if
5 you could pull up P47.
6 MS. FUTTERMAN: This is Depo Exhibit 40.
7 (Plaintiff Exhibit 40 was marked for
8 identification.)
9 BY MS. CASEY:
10 Q. And, sir, let me know when you've had a
11 chance to look at that.
12 **A. I have it right in front of me.**
13 Q. Sir, is this an agreement that was
14 entered into between Fuego Enterprises, Inc., and
15 Norwegian Cruise Line Holdings Ltd.?
16 **A. Yes.**
17 Q. All right. And going through this
18 document, it looks like there were some changes
19 made to the scope of work under item revisions 2,
20 3, 4, I think, 5 and 6 and 7 and 8.
21 Do these revisions accurately reflect
22 the modifications to the services that Fuego
23 Enterprises provided for Norwegian Cruise Lines
24 while this first amendment was in effect?
25 **A. Yes.**

Page 24

1 Q. And are there services that are listed
2 in this first amendment to the master letter
3 agreement that Fuego Enterprises did not end up
4 providing?
5 **A. No.**
6 Q. Sir, as you noted in Exhibit 1 to
7 Plaintiff's Exhibit 38, which is the topics for
8 discussion today, we used the term "subject
9 property" many times. I'm going to try to refrain
10 from doing that today. Instead, I'm going to refer
11 to either the Havana Port Terminal or the Sierra
12 Maestra Port Terminal in Havana.
13 If I say those words, do you know what
14 I'm referring to?
15 **A. Yes.**
16 Q. Okay. And then just to be very sure,
17 can we pull Plaintiff's Exhibit 6, please.
18 Now, sir, this was an exhibit that was
19 used in Mr. Parodi's deposition, and he's already
20 testified as to what this is, but can you tell me
21 just so that we don't have any -- that we're sure
22 we're talking about the same thing, can you tell me
23 what is depicted in Plaintiff's Exhibit 6?
24 **A. This seems to be to me the Port of**
25 **Havana.**

Page 25

1 Q. Okay. And, sir, am I correct that there
2 is a Marginal Building -- and I'm looking at the
3 top picture there which is looking towards the
4 city. There's a Marginal Building and then three
5 piers that jut out into the harbor or into the
6 water. Is that an accurate description?
7 **A. It's an accurate description of the**
8 **picture in front of me, yes.**
9 Q. And the lower picture is the street view
10 looking out into the water; is that correct?
11 **A. That is correct.**
12 Q. What street is this? Do you know?
13 **A. I don't. I cannot tell from the picture**
14 **what street that is.**
15 Q. And then if -- Ellie, could you pull up
16 Plaintiff's Exhibit 4.
17 And, sir, what's depicted in this
18 picture?
19 **A. It seems to be the terminal, Sierra**
20 **Maestra.**
21 Q. Do you know what street this is? It's a
22 better angle.
23 **A. Yeah, no, I don't remember the name of**
24 **the street.**
25 Q. Oh, okay. I understand. I thought

Page 26

1 maybe you just couldn't tell from the prior
2 picture.
3 Have you been to this property, the
4 Havana Port Terminal?
5 **A. Yes.**
6 Q. How many times?
7 **A. Numerous times.**
8 Q. More than ten?
9 **A. Yes.**
10 Q. More than 20?
11 **A. Yes.**
12 Q. More than 40?
13 **A. I don't know. I'm sorry. I -- several**
14 **times, numerous times.**
15 Q. When was the first time that you went to
16 the Havana Port Terminal?
17 **A. Sometime in 2016.**
18 Q. And why did you go there sometime in
19 2016?
20 **A. I wanted to -- I was curious, and I**
21 **wanted to see the terminal.**
22 Q. Did you go from the street or did you go
23 to the port terminal via a cruise ship?
24 **A. No. I was -- I went from the street.**
25 Q. And were you doing that on behalf of --

Page 27

1 scratch that.
2 Were you doing that in connection with
3 any work that you were performing for Norwegian
4 Cruise Lines?
5 **A. I was taking a look at the terminal. I**
6 **was not allowed to be in the terminal, so I was**
7 **looking at the building from the outside.**
8 Q. Why were you not allowed to get into the
9 terminal?
10 **A. Because --**
11 MR. LORENZO: Objection to form.
12 You can answer if you know.
13 **A. Because I was not authorized to come**
14 **into the terminal.**
15 BY MS. CASEY:
16 Q. Are Cuban people that have no business
17 in the terminal allowed to walk into the terminal?
18 MR. LORENZO: Objection to form.
19 You can answer.
20 **A. As far as I'm concerned, no one is**
21 **allowed into the terminal unless you work at the**
22 **terminal.**
23 BY MS. CASEY:
24 Q. Is there a security person at the
25 terminal entrance preventing people from walking

Page 28

1 in?
2 **A. Yes.**
3 Q. If a cruise line passenger were to try
4 to walk in through the door from the street, would
5 they be able to do that?
6 MR. LORENZO: Objection to form.
7 **A. Yes.**
8 BY MS. CASEY:
9 Q. But a regular Cuban citizen who is not a
10 passenger on a cruise ship would not be able to
11 walk into the terminal building?
12 **A. Unless they work at the terminal, no.**
13 Q. When was the last time you visited the
14 Havana Port Terminal?
15 **A. Sometime end of 2 -- mid 2018.**
16 Q. And when you visited in mid 2018, was
17 that to conduct any services on behalf of Norwegian
18 Cruise Line?
19 **A. Yes.**
20 Q. What were you doing for Norwegian Cruise
21 Line at the time?
22 **A. I was just looking at the operations.**
23 Q. Have you visited the Havana Port
24 Terminal by cruise ship?
25 **A. Yes.**

Page 29

1 Q. Maybe that's -- that wasn't a very good
2 question.
3 But have you disembarked at the Havana
4 Port Terminal from a cruise ship?
5 **A. Yes, I have.**
6 Q. And was the cruise ship one operated by
7 Norwegian Cruise Lines?
8 **A. Yes.**
9 Q. Have you disembarked at the Havana Port
10 Terminal on a cruise ship that was not operated by
11 Norwegian Cruise Line?
12 **A. No.**
13 Q. And, sir, I forgot to ask you this, but
14 does Fuego Enterprises perform services for any
15 other cruise lines?
16 **A. No.**
17 Q. Does Fuego Enterprises, Inc., have any
18 other clients besides Norwegian Cruise Lines?
19 **A. No.**
20 Q. And is that true from 2016 through 2019?
21 **A. Yes.**
22 Q. When you visited by cruise and you
23 disembarked at the Havana Port Terminal, was there
24 flags or signage from the Norwegian Cruise Line
25 brand?

Page 30

1 **A. No.**
 2 Q. Any marketing materials of Norwegian
 3 Cruise Line at the Havana Port Terminal?
 4 **A. No.**
 5 Q. Are there any model Norwegian Cruise
 6 Line ships at the Havana Port Terminal?
 7 **A. Yes.**
 8 Q. Okay. And where are they located?
 9 **A. Inside -- I don't remember exactly the**
 10 **location, but, yes, there was a ship model there.**
 11 Q. And if you could just walk me through.
 12 If you land -- or if you disembark from a Norwegian
 13 Cruise Line ship, how do you get from the ship to
 14 the Havana Port Terminal?
 15 **A. When you disembark, you go through the**
 16 **immigration booth which is already in the**
 17 **terminal --**
 18 Q. And --
 19 **A. -- inside the terminal.**
 20 Q. So you go from -- I'm assuming a gangway
 21 from the ship onto --
 22 **A. Yes.**
 23 Q. -- onto the port terminal.
 24 And you would arrive at the second
 25 floor; correct?

Page 31

1 **A. Yes.**
 2 Q. All right. And then the first thing
 3 that you would go through, as you said, sir, is
 4 immigration?
 5 **A. That is correct.**
 6 Q. And then would you go through customs
 7 and security?
 8 **A. Customs.**
 9 Q. And that's on the -- again on the second
 10 floor; right?
 11 **A. That is correct.**
 12 Q. Are there any stores on the second
 13 floor?
 14 **A. Yes.**
 15 Q. What kinds of stores?
 16 **A. Many souvenir stores.**
 17 Q. And those are for passengers to buy
 18 souvenirs?
 19 MR. LORENZO: Objection to form.
 20 **A. Those stores are -- I have no -- nothing**
 21 **to say about the stores. They're state-owned**
 22 **stores and they're just there.**
 23 BY MS. CASEY:
 24 Q. All right. But they're open for
 25 passengers?

Page 32

1 MR. LORENZO: Objection to form.
 2 **A. They're open.**
 3 BY MS. CASEY:
 4 Q. And passengers can -- I'm asking
 5 because, for example, you testified that a Cuban
 6 person off the street can't walk into the terminal.
 7 So I'm trying to determine who is allowed to go
 8 shop at these stores.
 9 So my question to you, sir, is: Are the
 10 Norwegian Cruise Line passengers permitted to shop
 11 at these stores that are located in the Havana Port
 12 Terminal?
 13 MR. LORENZO: Objection to form.
 14 **A. I'm sorry. I cannot answer that**
 15 **question.**
 16 BY MS. CASEY:
 17 Q. Why not?
 18 **A. Because I -- I don't know whether**
 19 **they're authorized or not. That was not my job to**
 20 **find out whether an American passenger disembarking**
 21 **on an American cruise ship is authorized to buy**
 22 **products in a store, and I personally never seen**
 23 **any passengers purchasing at any of those stores.**
 24 Q. How many cruise ships did you take to
 25 Cuba?

Page 33

1 **A. I believe two.**
 2 Q. Okay. And so your testimony today,
 3 under oath, is on those two cruise sailings that
 4 stopped at Havana Port Terminal, you never saw one
 5 Norwegian passenger visiting a store at the Havana
 6 Port Terminal?
 7 MR. LORENZO: Objection to form.
 8 **A. That is correct.**
 9 BY MS. CASEY:
 10 Q. And what about currency exchange? Is
 11 there a currency exchange in the Havana Port
 12 Terminal?
 13 **A. Yes, there is.**
 14 Q. And have you ever exchanged money at the
 15 currency exchange that's at the Havana Port
 16 Terminal?
 17 **A. No.**
 18 Q. Have you ever seen any Norwegian Cruise
 19 Line passengers exchange money at the currency
 20 exchange?
 21 **A. Yes.**
 22 Q. All right. And then passengers in order
 23 to leave the terminal building, they then have to
 24 go to the ground floor; correct?
 25 **A. That is correct.**

Page 34

1 Q. All right. And how do you get to the
2 ground floor?
3 **A. There is two ways. There's an elevator
4 and there's a stairs.**
5 Q. And then how do passengers exit the
6 Havana Port Terminal building? Do they leave by
7 the front door or somewhere else?
8 MR. LORENZO: Objection to form.
9 You can answer if you know.
10 **A. They either take a bus to go on on their
11 shore excursions, or if they were doing a walking
12 tour of Old Havana, they would just walk through
13 the front door.**
14 BY MS. CASEY:
15 Q. And the buses are arranged by whom?
16 **A. Havanatur.**
17 Q. Is Havanatur an agency of the Cuban
18 Government?
19 MR. LORENZO: Objection to form.
20 **A. I can't speak on behalf of Havanatur.**
21 BY MS. CASEY:
22 Q. What is Havanatur?
23 **A. Havanatur is an international travel
24 agency, I believe, registered in Panama.**
25 Q. Sir, between -- let's start at Topic

Page 35

1 II(B) which is the Cuban ports, excluding the
2 subject property which as we've discussed today
3 means the Havana Port Terminal, contains
4 immigration, customs and medical screening
5 capabilities.
6 And my question is, between 2015 and
7 2019, which ports in Cuba contained immigration,
8 customs, and medical screening?
9 MR. LORENZO: Objection to form.
10 You can answer if you know.
11 **A. As far as I was concerned at the time,
12 only the terminal Havana or the Havana Terminal.**
13 BY MS. CASEY:
14 Q. Okay. Is it your testimony today, sir,
15 that Havana Port Terminal is the only port terminal
16 in Cuba that contains immigration?
17 MR. LORENZO: Objection to form.
18 **A. No, it's not.**
19 BY MS. CASEY:
20 Q. Okay. What other Cuban ports have
21 immigration capabilities?
22 MR. LORENZO: Objection to form.
23 You can answer if you know.
24 **A. The Port of Cienfuegos and the Port of
25 Santiago de Cuba.**

Page 36

1 BY MS. CASEY:
2 Q. Any other port, sir, besides Cienfuegos,
3 Santiago, and Havana that contain immigration?
4 MR. LORENZO: Objection to form.
5 **A. Not that I know of.**
6 BY MS. CASEY:
7 Q. And what about customs? Which ports in
8 Cuba contain customs facilities?
9 MR. LORENZO: Objection to form.
10 You can answer if you know.
11 **A. The Port of Cienfuegos and the Port of
12 Santiago de Cuba.**
13 BY MS. CASEY:
14 Q. And which Cuban ports contain medical
15 screening capabilities in Cuba?
16 MR. LORENZO: Objection to form.
17 You can answer if you know.
18 **A. Can you repeat the question?**
19 BY MS. CASEY:
20 Q. Which ports in Cuba contain medical
21 screening capabilities?
22 **A. Medical screening capabilities. I don't
23 know -- I don't understand the question what you
24 mean by medical screening capabilities.**
25 Q. Well, sir, Norwegian Cruise Lines has

Page 37

1 taken the position in this litigation that the
2 Havana Port Terminal was a port terminal that they
3 stopped at because it contained immigration,
4 customs, and medical screening capabilities. Those
5 are the words of Norwegian.
6 And so my question to you -- maybe the
7 first question is -- what does Norwegian mean when
8 it says medical screening capabilities?
9 **A. I assume they mean that there's a
10 medical staff at the ports ready to attend to any
11 passengers in need.**
12 Q. Okay. And so what Cuban ports have
13 medical screening capabilities?
14 **A. I've seen it at the Port of Havana.**
15 Q. What about Cienfuegos?
16 **A. I never seen it at Cienfuegos, but I'm
17 sure they probably have it, but I have never seen
18 it.**
19 Q. And what about Santiago?
20 MR. LORENZO: Objection to form.
21 **A. Again, medical screening capabilities, I
22 haven't seen at the Port of Santiago.**
23 BY MS. CASEY:
24 Q. What about Punta Frances, do you know if
25 Punta Frances is capable of accepting cruise ships?

Page 38

1 **A. Punta Frances, is that the one in -- I**
 2 **need to be reminded where is that at.**
 3 Q. Isla de la Juventud.
 4 **A. Yes.**
 5 Q. Yes, it is able to accept cruise ships?
 6 **A. Yes.**
 7 Q. And does Punta Frances or Isla de la
 8 Juventud contain immigration?
 9 MR. LORENZO: Objection to form.
 10 **A. Yes.**
 11 BY MS. CASEY:
 12 Q. And Punta Frances, Isla de la Juventud,
 13 does it have customs facilities?
 14 MR. LORENZO: Objection to form.
 15 Answer if you know.
 16 **A. I don't know.**
 17 BY MS. CASEY:
 18 Q. Do you know if Punta Frances, Isla de la
 19 Juventud, has medical screening capabilities?
 20 MR. LORENZO: Objection to form.
 21 **A. I don't know.**
 22 BY MS. CASEY:
 23 Q. What about Matanzas, do you know what
 24 facilities are available in Matanzas?
 25 MR. LORENZO: Objection to form.

Page 39

1 **A. None that I know of.**
 2 BY MS. CASEY:
 3 Q. And what about Antilla Nipe Bay?
 4 MR. LORENZO: Objection to form.
 5 **A. None that I know of.**
 6 BY MS. CASEY:
 7 Q. What about Port Mariel in Havana?
 8 MR. LORENZO: Objection to form.
 9 **A. None.**
 10 BY MS. CASEY:
 11 Q. And what about María la Gorda, do you
 12 know what facilities it has?
 13 MR. LORENZO: Objection to form.
 14 **A. No, I do not.**
 15 BY MS. CASEY:
 16 Q. Do you know -- if there's several
 17 stops -- if a cruise ship has several stops in Cuba
 18 on the itinerary, do passengers have to clear
 19 customs and immigration at every stop?
 20 MR. LORENZO: Objection to form.
 21 **A. Yes.**
 22 BY MS. CASEY:
 23 Q. And so it's your testimony, sir, that if
 24 there's an itinerary that contains a stop in
 25 Havana, in Santiago, and Cienfuegos, let's say,

Page 40

1 that passengers would have to clear customs and
 2 immigration at the Port of Havana and then in
 3 Cienfuegos and then in Santiago; is that your
 4 testimony?
 5 **A. Yes.**
 6 Q. What's the source of that information?
 7 MR. LORENZO: Objection to form.
 8 **A. Myself.**
 9 BY MS. CASEY:
 10 Q. In your experience -- when you say
 11 myself, what do you mean?
 12 **A. You asked a question what's my -- the**
 13 **source, and I said, "I'm the source."**
 14 Q. Okay. And so the source is that you've
 15 done research on this or is the source your
 16 personal experience? What is your source?
 17 **A. Both.**
 18 Q. Okay. What research have you done that
 19 lead you to conclude that if a Norwegian Cruise
 20 Line ship has three stops in Cuba on its itinerary,
 21 passengers must clear customs and immigration at
 22 every stop?
 23 **A. I visited those ports facilities before**
 24 **Norwegian utilized those ports.**
 25 Q. Okay. And have you done any research

Page 41

1 into it, into this question?
 2 MR. LORENZO: Objection to form.
 3 **A. I do not understand the question.**
 4 BY MS. CASEY:
 5 Q. What was the kind of research that you
 6 did that lead you to the conclusion that an NCL
 7 passenger on a cruise ship that has three stops on
 8 its itinerary in Cuba must clear customs and
 9 immigration at every stop?
 10 MR. LORENZO: Objection to form.
 11 **A. Well, Number 1, it's a Cuban mandate**
 12 **that they have to clear customs and immigration.**
 13 **And Number 2, as I said before, I**
 14 **personally visited those ports facilities prior to**
 15 **the arrivals of Norwegian Cruise Lines Holdings to**
 16 **those destinations.**
 17 BY MS. CASEY:
 18 Q. Okay. When you say it's a Cuban
 19 mandate, what's the source of that? It's a law?
 20 MR. LORENZO: Objection to form.
 21 **A. I believe foreign passengers arriving in**
 22 **any foreign country has to clear immigration and**
 23 **customs.**
 24 BY MS. CASEY:
 25 Q. Right, but my question is, do they need

Page 42

1 to clear immigration and customs at the first port
2 of call in that foreign country or in every single
3 port of call on the itinerary if every single port
4 of call is in the same country?
5 MR. LORENZO: Objection to form.
6 **A. At every single port facility.**
7 BY MS. CASEY:
8 Q. And what Cuban law is it that requires
9 that, sir?
10 MR. LORENZO: Objection to form.
11 **A. I'm not a member of the Cuban**
12 **Government. I cannot answer that question nor I**
13 **know of any law that says that.**
14 BY MS. CASEY:
15 Q. When a ship anchors offshore in Cuba,
16 can immigrations and customs be done onboard the
17 ship by the Cuban Government?
18 MR. LORENZO: Objection to form.
19 **A. I do not know what you mean by -- I**
20 **don't know -- I don't understand the question.**
21 BY MS. CASEY:
22 Q. Okay. When a ship anchors offshore in
23 Cuba, can the Cuban Government officials that
24 perform customs and immigration come on shore --
25 I'm sorry -- come onto the ship and perform their

Page 43

1 services on the ship?
2 MR. LORENZO: Objection to form.
3 **A. No.**
4 BY MS. CASEY:
5 Q. Okay. And what is your source for that
6 answer?
7 **A. My -- in my conversations with**
8 **immigration officials, that was not authorized.**
9 Q. When did you have these conversations?
10 **A. Several times.**
11 Q. Can you give me a year?
12 **A. All the years that we had operations in**
13 **Cuba.**
14 Q. And who were the immigration officials
15 that you spoke with?
16 **A. From the head of immigration to the**
17 **officers in charge of the Port of Havana.**
18 Q. Okay. And can I have the name?
19 **A. I don't remember the names.**
20 Q. Was anybody else present when you had
21 these conversations with immigration officials?
22 **A. Might have been.**
23 Q. Okay. And if someone might have been
24 there, who would that person be?
25 **A. All their immigration officials.**

Page 44

1 Q. But you don't remember the names of any
2 of them?
3 **A. No, I do not.**
4 Q. Was there anybody at any of these
5 conversations that you had with immigration
6 officials -- let me rephrase that.
7 Present at any of these meetings with
8 immigration officials, was there ever any person
9 from Norwegian Cruise Lines?
10 **A. No.**
11 Q. All right. Let's turn to topic IV(B).
12 MR. LORENZO: Ms. Casey, it's Richard
13 Lorenzo. I see we've been going for about an
14 hour, and I see that you're shifting to
15 another category. I don't know if this might
16 be an appropriate time to take a short comfort
17 break.
18 MS. CASEY: Sure, of course. Let's
19 break for ten minutes.
20 MR. LORENZO: That will be great. Thank
21 you so much.
22 THE VIDEOGRAPHER: We are going off the
23 record. The time is 10:28 a.m.
24 (Break from 10:28 a.m. to 10:40 a.m.)
25 THE VIDEOGRAPHER: We are back on the

Page 45

1 record. The time is 10:40 a.m.
2 BY MS. CASEY:
3 Q. Sir, when we left off, we were going to
4 start talking about Topic IV(B), and the topic is,
5 "The facts and documents that support the
6 Defendant's contention that its transactions and
7 uses of the subject property were necessary for the
8 conduct of lawful travel to Cuba, and the names and
9 positions of Defendant employees with such
10 knowledge."
11 I'll start with the facts part of the
12 question. Sir, could you tell me what are the
13 facts that support Norwegian's contention that its
14 transaction and uses of the Havana Port Terminal
15 facility in Cuba was necessary to the conduct of
16 lawful travel to Cuba?
17 **A. The travel to Cuba was part of the Obama**
18 **Administration's policy to engage in travel and**
19 **meaningful interaction between Americans and the**
20 **Cuban people. So under those regulations, the**
21 **cruise lines, the airlines were fully authorized by**
22 **the US Government and permitted to engage into**
23 **those travel services between the 12 categories of**
24 **travel approved by the Office of Foreign Asset**
25 **Control.**

Page 46

1 Q. Okay, sir, and those are the facts that
2 support Norwegian's contention that the
3 transactions and uses of the Havana Port Terminal
4 facility in Cuba was necessary to the conduct of
5 lawful travel to Cuba?
6 MR. LORENZO: Objection.
7 **A. You would have to ask Norwegian that and**
8 **their lawyers.**
9 BY MS. CASEY:
10 Q. Well, sir, I'm asking you because you
11 are speaking on behalf of Norwegian today in this
12 deposition.
13 **A. I understand, but I'm no legal expert on**
14 **that.**
15 Q. And I'm not asking you for any legal
16 conclusions. I'm asking you for what facts "what
17 facts" support Norwegian's contention.
18 **A. And my opinion on that is that travel to**
19 **Cuba by cruise lines or by airplanes was fully**
20 **authorized and in conjunction with the Obama**
21 **Administration Cuba policies.**
22 Q. Okay. Any other facts that Norwegian
23 Cruise Line will rely upon to support its defense
24 that its transactions and uses of the Havana Port
25 Terminal were necessary to the conduct of lawful

Page 47

1 travel to Cuba?
2 MR. LORENZO: Objection to form.
3 **A. I believe that's a question that should**
4 **be addressed to Norwegian.**
5 BY MS. CASEY:
6 Q. Yes. And, sir, again, you are
7 Norwegian. Today you are testifying on behalf of
8 Norwegian Cruise Line Holdings Ltd., so I'm asking
9 you as the representative selected by Norwegian
10 Cruise Line whether those are the entirety of the
11 facts that Norwegian will rely upon to support its
12 defense that its transactions and uses of the
13 Havana Port Terminal were necessary to the conduct
14 of lawful travel to Cuba.
15 **A. I believe that's -- those are the facts.**
16 Q. And what documents support Norwegian's
17 contention that its transactions and uses of the
18 Havana Port Terminal were necessary to the conduct
19 of lawful travel to Cuba?
20 **A. You will have to address that question**
21 **to Norwegian's lawyers.**
22 Q. Sir, once again, you have been
23 designated by Norwegian Cruise Line to testify on
24 behalf of Norwegian Cruise Line as to the documents
25 that support Norwegian Cruise Line's contention

Page 48

1 that its transactions and uses of the subject
2 property, the Havana Port Terminal, were necessary
3 to the conduct of lawful travel to Cuba; so I'm
4 asking you.
5 **A. Again, I'm not a lawyer. I cannot**
6 **speculate on those facts. However, the regulations**
7 **are posted by the Office of Foreign Asset Control.**
8 **They're there available for anyone to see. I'm not**
9 **going to get into the specific statute that allows**
10 **that.**
11 **All I can speak in a general manner,**
12 **that travel to Cuba was fully authorized by the**
13 **United States Government, by the Office of Foreign**
14 **Asset Control, and it was -- it was the -- it was**
15 **the Obama Administration's intentions to engage the**
16 **Cubans by meaningful interaction traveling by**
17 **cruise lines and by air.**
18 Q. Do I understand correctly, sir, what
19 you're saying is that the documents that Norwegian
20 Cruise Line will use to support its defense that
21 its transactions and uses of the subject property
22 were necessary to the conduct of lawful travel to
23 Cuba consists of the OFAC regulations; is that
24 accurate?
25 **A. The cruise lines were fully authorized**

Page 49

1 **by the Obama Administration's -- whichever**
2 **department is in charge, whether it's the commerce**
3 **department or the transportation department, but**
4 **the cruise lines as well as the airlines were fully**
5 **authorized to engage in travel related services to**
6 **Cuba.**
7 Q. Sir, the topic that was noticed for
8 deposition today says, "The facts and documents
9 that support Defendant's contention that its
10 transactions and uses of the subject property were
11 necessary to the conduct of lawful travel to Cuba."
12 I'm not trying to trick you. This is a
13 topic that we provided to Norwegian and that
14 Norwegian selected you as the representative who
15 would be prepared to testify about that. And so
16 I'm just trying to find out from you, sir, what
17 documents "documents" support Norwegian's
18 contention that its transactions and uses of the
19 Havana Port Terminal were necessary to the conduct
20 of lawful travel to Cuba.
21 **A. And I believe I answered the question**
22 **several times. The cruise lines were fully**
23 **authorized under the travel guidance posted by the**
24 **Office of Foreign Asset Control. It was fully**
25 **authorized under the Obama Administration that**

Page 50

1 **cruise lines, airlines, and Americans could travel**
2 **to Cuba under the 12 categories of travels and**
3 **regulations posted at the website for the Office of**
4 **Foreign Asset Control. I don't have those specific**
5 **documents, and I don't know what documents you're**
6 **referring to.**
7 Q. I don't know what documents they are
8 either, sir; that's why we noticed this topic for
9 deposition and why we are asking you, sir, as the
10 representative for Norwegian to identify them for
11 us.
12 **A. Okay.**
13 Q. Can you identify any documents for us?
14 MR. LORENZO: Objection to form.
15 BY MS. CASEY:
16 Q. Can you identify any documents for us
17 that are responsive to Topic IV(B)?
18 MR. LORENZO: Objection to form.
19 **A. Yeah, I don't have those documents.**
20 MR. POSTMAN: Do you want see IV(B)? Do
21 you want to see it? Show it to him just so he
22 sees it.
23 BY MS. CASEY:
24 Q. Sir, do you have anything else to add to
25 your answer?

Page 51

1 **A. No.**
2 Q. Sir, were you involved in obtaining any
3 license from the US Government?
4 **A. No.**
5 Q. And to break that down, did Fuego
6 Enterprises, Inc., ever make any application for
7 any license from the US Government in order to
8 conduct business in Cuba?
9 **A. No.**
10 Q. And were you involved in Norwegian
11 Cruise Line's efforts to obtain any license from
12 the US Government to operate in Cuba?
13 **A. No.**
14 Q. Were you involved in -- I'm sorry.
15 Scratch that.
16 Did Fuego Enterprises obtain any license
17 from the Cuban Government to operate in Cuba?
18 **A. No.**
19 Q. Do you know if Fuego Enterprises was
20 required to obtain any license from the Cuban
21 Government to operate in Cuba?
22 **A. You're referring on behalf of Norwegian;**
23 **correct?**
24 Q. No, no, on behalf of Fuego Enterprises
25 first, sir.

Page 52

1 **A. We have -- we don't need -- we don't**
2 **have any licenses requirements.**
3 Q. Okay. And now on behalf of Norwegian
4 Cruise Lines, did Norwegian Cruise Line need to
5 obtain any license from the Cuban Government to
6 operate cruises to Cuba?
7 MR. LORENZO: Objection to form.
8 **A. No.**
9 BY MS. CASEY:
10 Q. And did Norwegian Cruise Lines --
11 scratch that.
12 Do you know if Norwegian Cruise Lines
13 was required by the Cuban Government to obtain any
14 licenses from the Cuban Government to operate
15 cruises to Cuba?
16 MR. LORENZO: Objection to form.
17 **A. No.**
18 BY MS. CASEY:
19 Q. Sir, you were involved in all berthing
20 requests that were made on behalf of Norwegian
21 Cruise Lines to Aries Transportes S.A., weren't
22 you?
23 **A. Yes, in most of them, yes.**
24 Q. Can you tell me what Aries
25 Transportes S.A. is?

Page 53

1 **A. I'm sorry. Can you repeat the question?**
2 Q. Can you tell me what Aries
3 Transportes S.A. is?
4 **A. Aries is the Cuban entity that manages**
5 **the Port of Havana.**
6 Q. Okay. And it manages all ports or just
7 the Havana Port Terminal?
8 MR. LORENZO: Objection to form.
9 **A. I believe the ports that we were engaged**
10 **with.**
11 BY MS. CASEY:
12 Q. What were those ports?
13 **A. The Port of Havana, the Port of**
14 **Cienfuegos and the Port of Santiago de Cuba.**
15 Q. Having had the experience of being
16 included on most of the berthing requests made to
17 Aries, did you see any proposed itineraries from
18 Norwegian Cruise Lines that did not include a stop
19 in Havana?
20 **A. Not that I remember.**
21 Q. And, sir, what persons at Norwegian
22 Cruise Lines would know or have information about
23 Topic IV(B)?
24 **A. Allow me to check it.**
25 **I believe Norwegian Cruise Line**

Page 54

1 **Holdings' legal department.**
 2 Q. All right. And, sir, you'll recall in
 3 the beginning of this deposition I asked you if
 4 you're going to refer to any documents, you let me
 5 know what those documents you are. It looks like
 6 you looked at a document. Could you let me know
 7 what is it that you looked at?
 8 MR. LORENZO: Ms. Casey, I provided a
 9 hard copy of the re-notice of the 30(b)(6)
 10 deposition. He was looking at Section IV(B).
 11 BY MS. CASEY:
 12 Q. Okay.
 13 Were there any notes on the re-notice of
 14 deposition that you were just looking at, sir?
 15 A. No.
 16 Q. What persons at the legal department
 17 would have knowledge on the topics -- or on the
 18 topic notices IV(B)?
 19 MR. LORENZO: Objection to form.
 20 A. I believe Mr. Lincoln Vidal and Mr. Dan
 21 Farkas.
 22 BY MS. CASEY:
 23 Q. Who is Lincoln Vidal?
 24 A. One of the attorneys at the -- one of
 25 the in-house attorneys at Norwegian Cruise Line

Page 55

1 **Holdings.**
 2 Q. Did you meet with Mr. Vidal in
 3 preparation for your testimony today?
 4 A. He was present at one or two of the
 5 meetings, yes.
 6 Q. And then the other gentleman you
 7 mentioned was Dan Farkas; is that right?
 8 A. Yes.
 9 Q. Who is Dan Farkas?
 10 A. He's the lead counsel at Norwegian
 11 Cruise Line Holdings.
 12 Q. Did you meet with Mr. Farkas in
 13 preparation for your testimony today?
 14 A. I did not meet with neither one of them.
 15 They were present on the preparations with my
 16 attorney.
 17 Q. I'm sorry. I didn't get the end of what
 18 you said.
 19 A. I said they were present during some of
 20 the preparations that I had before this deposition.
 21 Q. Let's turn to Topic IV(D).
 22 That topic, sir, are "The reasons for
 23 the decision to choose the subject property as the
 24 location to dock the ships operated by the
 25 Defendant, and the names and the positions of the

Page 56

1 Defendant employees involved in that decision."
 2 MR. LORENZO: Ms. Casey, do you have any
 3 objection to my providing him a hard copy of
 4 that so he has it in front of him so it's not
 5 on the screen?
 6 MS. CASEY: Of course not, of course
 7 not.
 8 MR. LORENZO: Thank you.
 9 BY MS. CASEY:
 10 Q. Sir, let me know when you're ready.
 11 A. I am.
 12 Q. And, you know, I apologize because I'm
 13 going to do this now out of turn, but you mentioned
 14 Mr. Lincoln Vidal and Mr. Dan Farkas for the prior
 15 Topic IV(B).
 16 Are there any other employees that you
 17 can think of that would have knowledge about that
 18 Topic IV(B), B as in "boy"?
 19 A. I cannot speak on behalf of who at
 20 Norwegian was knowledgeable of that, but I would --
 21 I would -- I would say that -- that the principals
 22 at Norwegian could have been knowledgeable on the
 23 subject.
 24 Q. And, sir, again, you can speak on behalf
 25 of Norwegian for purposes of this deposition

Page 57

1 because you are the corporate representative that
 2 Norwegian Cruise Lines has actually selected to
 3 speak on its behalf.
 4 Who are the other individuals that you
 5 were thinking of besides Mr. Vidal and Mr. Farkas?
 6 A. When I said I cannot speak on behalf of
 7 Norwegian, I'm referring that I'm not -- I'm not an
 8 employee. I'm not at the site of headquarter's
 9 offices. I don't know what goes on there.
 10 My job was to represent them in this
 11 particular endeavor of operations in Cuba. So I
 12 don't know what goes on internally in Norwegian,
 13 who's knowledgeable or whatever. So this -- when I
 14 say I'm not in a position to speak to that
 15 particular subject, that's what I'm trying to say.
 16 Q. Okay. Sir, do you understand that as
 17 part of what you're doing here today, testifying on
 18 behalf of Norwegian Cruise Line, you had to become
 19 prepared to speak on the topics that were
 20 designated for deposition here today. Do you
 21 understand that?
 22 A. Yes, I do.
 23 Q. Okay. But you're telling me that you
 24 were not prepared to identify other persons besides
 25 Mr. Vidal and Mr. Farkas?

Page 58

1 MR. POSTMAN: Object to the form.
 2 MR. LORENZO: Objection to form.
 3 **A. I'm saying that the persons at Norwegian**
 4 **with regard to this particular subject that I had**
 5 **all communications with was their legal department.**
 6 BY MS. CASEY:
 7 Q. And my question is a little different.
 8 My question to you, sir, is what are the persons,
 9 the Norwegian Cruise Line employees, that would
 10 have knowledge of Topic IV(B) regardless of whether
 11 you personally worked with them?
 12 MR. LORENZO: Objection to form.
 13 **A. And my answer would be, I can't**
 14 **speculate on that, but I would assume that the**
 15 **principals at Norwegian were aware of that**
 16 **particular subject.**
 17 BY MS. CASEY:
 18 Q. And who are the principals of Norwegian?
 19 **A. Mr. Frank Del Rio, the CEO of the**
 20 **company.**
 21 Q. Anyone else?
 22 **A. No.**
 23 Q. All right. Let's turn to IV(D), D as in
 24 "David."
 25 Have you reviewed that topic, sir?

Page 59

1 **A. May I? (D)?**
 2 Q. D as in "David."
 3 **A. Yes.**
 4 Q. Are you ready, sir?
 5 **A. Yes, I am.**
 6 Q. Okay. Can you tell me what were the
 7 reasons for the decision to include a Havana stop
 8 on the itineraries to Cuba?
 9 **A. Because it was the only port that was**
 10 **authorized at the moment.**
 11 Q. Okay. Authorized to do what?
 12 **A. For the cruise lines to use that**
 13 **facility.**
 14 Q. Let's break that down.
 15 I'm asking -- let's start with this.
 16 What were the reasons for choosing to stop in the
 17 city of Havana, regardless of what port terminal
 18 was used, but what were the reasons that NCL
 19 considered in making a decision to include a stop
 20 in the city of Havana on its Cuba cruises?
 21 **A. Well, Havana is the capital of the**
 22 **country of Cuba. It's where all the cultural**
 23 **facilities, museums, art galleries are. You know,**
 24 **Cuba is a cultural powerhouse, but the majority of**
 25 **that concentration on cultural venues and**

Page 60

1 **historical venues are in the city of Havana.**
 2 Q. And you've been there several times,
 3 sir. Is the Havana Port Terminal located close to
 4 Old Havana? Is that right?
 5 **A. Yes.**
 6 Q. All right. And is Old Havana an
 7 attractive tourist area?
 8 **A. Is Old Havana what? I didn't --**
 9 Q. An attractive tourist area.
 10 **A. Yes, it is.**
 11 Q. Are there tourist attractions -- and
 12 you, I think, started talking about this. Are
 13 there tourist attractions located close by to the
 14 Havana Port Terminal?
 15 **A. Please elaborate on tourist attractions.**
 16 Q. Sure.
 17 Are there areas or monuments or
 18 buildings of interest in Old Havana? What is there
 19 to see? Let me start just by asking. What is
 20 there to see? I have not personally been there.
 21 What is there to see in Old Havana?
 22 **A. Old Havana itself, it's a historical**
 23 **landmark. It's one of the most sought-after cities**
 24 **in the world, from churches to monuments to museums**
 25 **to the streets itself. The architecture of Old**

Page 61

1 **Havana, the richness of the history in Old Havana.**
 2 **Havana was the -- the center of the colonial years**
 3 **for the Spanish Conquistadors. So the city is rich**
 4 **in its history.**
 5 Q. And a lot of those attractions that
 6 you're describing are near the Havana Port
 7 Terminal; is that right?
 8 **A. The city of Havana itself is a**
 9 **historical site. The city of Old Havana has some**
 10 **of those monuments, as I mentioned, and museums and**
 11 **so forth.**
 12 Q. Okay. Who was responsible at Norwegian
 13 for planning the itineraries to Cuba?
 14 **A. I believe it's Mr. Mario Parodi. At**
 15 **least that's my contact person.**
 16 Q. And what goes into deciding where to
 17 stop? What factors would Norwegian Cruise Line
 18 consider when deciding which cities to stop at on a
 19 particular itinerary?
 20 MR. LORENZO: Objection to form.
 21 You can answer.
 22 **A. My job was to execute those decisions.**
 23 **I'm not going to speculate on what positions -- of**
 24 **how they make those decisions.**
 25

Page 62

1 BY MS. CASEY:
2 Q. Do you know which departments at
3 Norwegian Cruise Line would be involved in making
4 those decisions?
5 **A. I know the person that will be involved**
6 **in making the decision, and I believe it's Mario**
7 **Parodi.**
8 Q. Anybody else that you know of?
9 **A. Yes. There's another lady executive**
10 **that worked -- at least I communicated with there.**
11 **Her name is Jennifer -- I don't remember her last**
12 **name.**
13 Q. "Marmanillo" maybe?
14 **A. Yeah, could be.**
15 Q. Was the legal department consulted
16 before a decision was made by Norwegian Cruise Line
17 to select the Havana Port Terminal as a location to
18 dock ships in Havana?
19 MR. LORENZO: Objection to form.
20 **A. I don't know.**
21 BY MS. CASEY:
22 Q. Do you know who made the decision at
23 Norwegian Cruise Lines to approve the itineraries
24 that included a stop at the Havana Port Terminal?
25 MR. LORENZO: Objection to form.

Page 63

1 **A. I don't know.**
2 BY MS. CASEY:
3 Q. And then, sir, can you tell me what the
4 reasons were for Norwegian Cruise Line's choice to
5 stop at the Havana Port Terminal facility in
6 Havana?
7 **A. Can you repeat your question, please?**
8 Q. Sure.
9 What were the reasons for Norwegian
10 Cruise Lines to choose to stop at the Havana Port
11 Terminal facility in Havana?
12 **A. Aside from what I already answered that**
13 **Havana is, you know -- is a city -- it's the**
14 **capital of the nation and where most passengers**
15 **like to go because of the -- the -- the cultural**
16 **venues that reside within the boundaries of the**
17 **city of Havana. It was the city where we could**
18 **comply more with the 12 categories of travel under**
19 **the current regulations. Aside from that, it was**
20 **the only port available at the time we started the**
21 **operations.**
22 Q. And it was the only port available for a
23 cruise ship to dock at in the city of Havana; is
24 that what you're saying?
25 **A. It was the only port available for**

Page 64

1 **Norwegian Cruise Lines at the time.**
2 Q. Well, Norwegian Cruise Lines stopped at
3 other ports in Cuba; is that not right, sir?
4 **A. Yes.**
5 Q. Okay. So is it fair to say that your
6 testimony is that the Havana Port Terminal was the
7 only cruise port terminal that you, sitting here,
8 are aware of that would allow a cruise ship to dock
9 in the city of Havana?
10 MR. LORENZO: Objection to form.
11 **A. I think it's fair to say that the Havana**
12 **port at the time we started the operations was the**
13 **only port authorized for Norwegian Cruise Line to**
14 **use.**
15 BY MS. CASEY:
16 Q. In Havana?
17 **A. The Havana port was the only port**
18 **authorized for Norwegian Cruise Lines to use at the**
19 **time we started the operations.**
20 Q. Okay. Is it your testimony, sir, that
21 the Havana Port Terminal was the only port that the
22 Cuban Government authorized Norwegian Cruise Line
23 to use in all of the island of Cuba?
24 **A. At the beginning --**
25 MR. LORENZO: Objection to form.

Page 65

1 **A. Yes, at the beginning of our operations**
2 **to Cuba.**
3 BY MS. CASEY:
4 Q. When did Norwegian Cruise Line begin
5 operating to Cuba?
6 **A. I believe sometime in 2017.**
7 Q. Okay. Is it fair to say that it was in
8 March of 2017?
9 **A. Yes.**
10 Q. And your testimony here today is, in
11 March of 2017 the only city that Norwegian Cruise
12 Line stopped at was Havana.
13 All right. Can we take a break?
14 MR. POSTMAN: Sure. How long?
15 MS. CASEY: Five minutes.
16 MR. POSTMAN: Can we make it ten?
17 MS. CASEY: Sure.
18 MR. POSTMAN: Great. Thank you.
19 THE VIDEOGRAPHER: We are going off the
20 record. The time is 11:12 a.m.
21 (Break from 11:12 a.m. to 11:25 a.m.)
22 THE VIDEOGRAPHER: We are back on the
23 record. The time is 11:27 a.m.
24 BY MS. CASEY:
25 Q. All right, sir. The final topic that

Page 66

1 you were noticed for is Topic V(D), "All agreements
2 entered into by the Defendant, and any person or
3 entity acting on its behalf relating to the subject
4 property."
5 Do you see that?
6 **A. Yes.**
7 **(Plaintiff Exhibit 41 was marked for**
8 **identification.)**
9 BY MS. CASEY:
10 Q. Okay. I'm going to -- Ellie, could you
11 call up V2, and I believe that's going to be
12 Plaintiff's Exhibit 41.
13 Sir, take a minute to take a look at
14 that document, and then I'm going to ask you a few
15 questions about it.
16 **A. Okay.**
17 Q. So, sir, if you could just look -- this
18 is a -- do you recognize this document?
19 **A. Yes, I do.**
20 Q. Okay. What is this document?
21 **A. This document is an agreement between**
22 **Aries S.A. and Norwegian Cruise Line Holdings Ltd.**
23 Q. And remind me what Aries is.
24 **A. Aries is the Cuban entity in charge of**
25 **the Port of Havana or that manages the Port of**

Page 67

1 **Havana.**
2 Q. Okay. And does Aries manage the ports
3 in Cienfuegos?
4 **A. Yes.**
5 Q. And does Aires manage the port in
6 Santiago de Cuba?
7 **A. Yes.**
8 Q. And, sir, if you look on page 2 of this
9 contract -- and actually maybe before we do that,
10 if we go to page 9 of this contract -- and, sir, I
11 forgot to ask you, and I think I know the answer,
12 but are you fluent in Spanish?
13 **A. Yes, I am.**
14 Q. And you can read Spanish?
15 **A. Yes.**
16 Q. This document is in Spanish, but you'll
17 be able to read it today; correct?
18 **A. Yes.**
19 Q. Okay. You'll be better off than me
20 because I only read Portuguese because I'm from
21 Brazil, but I try my best, so we'll work together.
22 If you go to page 9 of this document,
23 what does it say the signing date of this document
24 is?
25 **A. Can you repeat the question, please?**

Page 68

1 Q. What date was this document signed?
2 **A. Oh, you're asking me -- oh, the 27th of**
3 **July 2017.**
4 Q. Okay. And so, sir, if you go back to
5 page 2 of this document, you see on the top there
6 it says, "These are the stops for all ships for the
7 season of 2017 to 2018."
8 Do you see that?
9 MR. POSTMAN: I'm sorry. Where are you?
10 MS. CASEY: Page 2. Page 2 of
11 Plaintiff's Exhibit 41.
12 **A. Yes.**
13 BY MS. CASEY:
14 Q. And then listed there, sir, under bullet
15 points are the Norwegian Sky, the Insignia, the
16 Regatta, the Serena, and the Norwegian Sun. Do you
17 see that?
18 **A. Yes.**
19 Q. Are those Norwegian Cruise Line's ships?
20 **A. Yes, they are.**
21 Q. Okay. And so for the first one,
22 Norwegian Sky, there are 31 stops in Cuban ports.
23 In Havana there are 31 stops. Insignia, there are
24 16 stops in Cuba, and -- let's see here. Of those,
25 six will be in Havana, five in Cienfuegos, five in

Page 69

1 Santiago de Cuba. Do you see that?
2 **A. Yes.**
3 Q. Okay. And then the Regatta, three stops
4 in Havana; is that correct?
5 **A. Yes.**
6 Q. And the Serena has approval for four
7 stops in Havana, three stops in Cienfuegos and
8 three stops in Santiago de Cuba. Do you see that?
9 **A. Yes.**
10 Q. And then finally, the Norwegian Sun is
11 approved for four stops in Havana. Do you see
12 that?
13 **A. Yes.**
14 Q. Sir, is it correct that this was the
15 first contract that Norwegian Cruise Line
16 Holdings Ltd. entered into with Aries?
17 **A. I believe so.**
18 Q. And Norwegian Cruise Line could not stop
19 wherever it wants whenever it wants. It needs to
20 obtain approval from Aries in order to make a stop
21 at a Cuban port; correct?
22 MR. LORENZO: Objection to form.
23 **A. That is correct.**
24 BY MS. CASEY:
25 Q. Okay. Sir, you testified before we had

Page 70

1 a break that the Cuban Government only authorized
2 Norwegian to call on the Port of Havana when
3 Norwegian Cruise Lines started cruising to Cuba.
4 Do you remember that testimony?
5 **A. I do.**
6 Q. Do you want to make any changes to that
7 testimony?
8 **A. No, I do not.**
9 Q. Ellie, can you pull up Plaintiff's
10 Exhibit 14.
11 There's a lot of information on this
12 document, sir, so I'll try to direct you to where
13 you need to go.
14 MR. LORENZO: Ms. Casey, if you give me
15 a minute, I'm trying to enlarge it.
16 MS. CASEY: I understand. It is very
17 small print.
18 MR. LORENZO: Okay. It's enlarged.
19 BY MS. CASEY:
20 Q. Okay. Sir, just momentarily going back
21 to Plaintiff's Exhibit 41, would it be fair to say
22 that as of July 2017, Aries had approved and
23 authorized Norwegian Cruise Line to make stops in
24 Cienfuegos, Santiago de Cuba, and Havana?
25 MR. LORENZO: Objection to form.

Page 71

1 **A. Yes.**
2 BY MS. CASEY:
3 Q. And then if you look at Plaintiff's
4 Exhibit 14, which is in front of you with a very
5 small font, if you can go to page 10 of this
6 document. And I'll represent to you, sir, that
7 this document was produced to us by Norwegian
8 Cruise Line Holdings.
9 **A. Okay.**
10 MR. LORENZO: Stephanie, can you
11 represent that this is the complete document?
12 MS. CASEY: I have no reason to doubt
13 it's not a complete document. It was used in
14 Mr. Parodi's deposition, and I don't believe
15 there was any objection to it.
16 MR. LORENZO: Okay. I just want to make
17 sure you're not picking a page in the middle
18 or anything like that.
19 MS. CASEY: Well, I am picking a page in
20 the middle to ask him about, but the exhibit
21 is the exact same exhibit that was used in
22 Mr. Parodi's deposition.
23 MR. LORENZO: And the page numbers,
24 Ms. Casey, are in the lower right-hand corner;
25 correct?

Page 72

1 MS. CASEY: Yes. Yes. I'm looking at
2 page 10 as it's written, as it's paginated at
3 the bottom there.
4 MR. LORENZO: Did you say page 9 or
5 page 10, Ms. Casey?
6 MS. CASEY: 10.
7 MR. LORENZO: Thanks.
8 BY MS. CASEY:
9 Q. So, sir, if you look at the top of
10 page 10, the very, very top, there's a title. What
11 does that title say?
12 **A. The very top of the page?**
13 Q. Yes, the little header at the top. It's
14 like a reading exam.
15 **A. At the very top it says, "Brand,**
16 **Installation, Type, Year, Cruise No., Date, Port,**
17 **Country" --**
18 Q. My apologies. And I'll just cut to the
19 chase. The very top, the little header of this
20 document that was produced to us by Norwegian
21 Cruise Line says Norwegian --
22 **A. Got it.**
23 Q. -- Cruise Line -- it actually says "NCLH
24 Itineraries with Cuba." Do you see that?
25 **A. Yes, of course.**

Page 73

1 Q. Okay. And so this document was produced
2 to us, as I said, by Norwegian Cruise Line and
3 purports to be the itineraries with Cuba that
4 Norwegian Cruise Line embarked on. And if you
5 see -- if you go all the way to the bottom, the
6 very last set of rows say Oceania. Do you see
7 that?
8 **A. Yes.**
9 Q. And it says MS Insignia?
10 **A. Yes.**
11 Q. And includes an itinerary, and that
12 itinerary stops at what cities in Cuba, sir?
13 **A. Havana, Cienfuegos, Santiago de Cuba.**
14 Q. Okay. And what are the dates of that
15 sailing?
16 **A. November -- well, Havana, November 15th,**
17 **2017; Cienfuegos, November 18, 2017; and Santiago**
18 **de Cuba, November 19, 2017, and 20th.**
19 Q. Now, sir, do you understand that the
20 Insignia was a smaller vessel than the Norwegian
21 Sky and the Norwegian Sun?
22 **A. Yes.**
23 Q. And so the Norwegian -- well, let me ask
24 you this.
25 Do you have any changes that you would

Page 74

1 want to make to your testimony made prior to the
2 break that the Cuban Government only authorized
3 Norwegian Cruise Line to call on the Port of Havana
4 when Norwegian Cruise Line began cruising to Cuba?
5 MR. POSTMAN: Form.
6 MR. LORENZO: Objection to form.
7 MR. POSTMAN: Join.
8 **A. No.**
9 BY MS. CASEY:
10 Q. Why not?
11 **A. Because it's as I stated.**
12 Q. Okay. Could you explain to me, sir,
13 what is the basis for your testimony that the Cuban
14 Government only authorized Norwegian Cruise Line to
15 stop at the Port of Havana on the island of Cuba?
16 MR. LORENZO: Objection to form.
17 **A. Can you repeat the question again?**
18 BY MS. CASEY:
19 Q. Sure.
20 Do you contend, sir, is it your position
21 on behalf of -- let me start again.
22 Is it your testimony, sir, on behalf of
23 Norwegian Cruise Line that the only port authorized
24 by the Cuban Government for Norwegian Cruise Line
25 to call upon on the island of Cuba was the Port of

Page 75

1 Havana?
2 MR. LORENZO: Objection to form.
3 **A. It is my testimony that the Port of**
4 **Havana at the time we signed the agreement,**
5 **although it mentioned other ports, was the only**
6 **port available for us to begin our operations.**
7 BY MS. CASEY:
8 Q. Okay. And what do you mean by that,
9 "available"?
10 **A. The only port that we could engage with**
11 **at the moment at the signing of the agreement.**
12 Q. And is that, sir, because the Norwegian
13 Sky and the Norwegian Sun were large vessels?
14 **A. No.**
15 MR. LORENZO: Objection to form.
16 You can answer.
17 **A. No.**
18 BY MS. CASEY:
19 Q. Okay. What is the reason for you saying
20 that, that it was the only -- I'm sorry.
21 Lance, could you repeat the last
22 question and answer that Mr. Cancio answered?
23 (The stenographer read the last question
24 and answer back.)
25

Page 76

1 BY MS. CASEY:
2 Q. So can you explain to me what the basis
3 is for your -- what facts are you basing your
4 testimony that the only port authorized by the
5 Cuban Government where NCL could stop was the Port
6 of Havana?
7 MR. LORENZO: Objection to form.
8 **A. You continue to mention the word**
9 **"authorize," and I think you're not understanding**
10 **my statements. It is evident -- we have it on our**
11 **agreement that we were authorized when we executed**
12 **the agreement to go to other ports. However, I**
13 **continued to testify that those other two ports**
14 **were not available at the time, although in our**
15 **agreement it stated we were approved to visit those**
16 **ports, though we're not physically available at the**
17 **time, and the only port we had fully authorized to**
18 **begin our operations at that time was the Port of**
19 **Havana.**
20 BY MS. CASEY:
21 Q. Okay. Why were the other ports not
22 available at the time?
23 MR. LORENZO: Objection to form.
24 **A. I think that's a question for the Cuban**
25 **Government, not for me.**

Page 77

1 BY MS. CASEY:
2 Q. Well, what was your understanding --
3 your -- you, sir, are the one who is testifying
4 that the other Cuban ports were not available at
5 the time Norwegian Cruise Line began cruising to
6 Cuba. What is the basis for that testimony?
7 **A. That I was told those ports were not**
8 **available at the time.**
9 Q. Okay. Who told you that?
10 **A. Cuban authorities.**
11 Q. Which Cuban authorities?
12 **A. Captain Albertini, president of Aries at**
13 **the time.**
14 Q. And when did he tell you that?
15 **A. From the very beginning that we started**
16 **engaging with them.**
17 Q. When was that?
18 **A. The beginning of 20 -- somewhere in 2016**
19 **I started the conversations, and during the signing**
20 **of the agreement they stated it.**
21 Q. What did he say exactly?
22 **A. Those ports are not available at the**
23 **time.**
24 Q. When he said that, who was present with
25 you?

Page 78

1 **A. Cuban officials, port authorities, Cuban**
2 **Coast Guard, immigrations, in meetings and other**
3 **private meetings between me and Captain Albertini.**
4 **Those were the Cuban answer to our question -- to**
5 **my question.**
6 Q. And was there anybody from Norwegian
7 Cruise Line present when Captain Albertini said the
8 other Cuban ports are not available at the time?
9 **A. It might have been at the beginning when**
10 **some of Norwegian Cruise Lines executives traveled**
11 **to Cuba. I don't remember if, in fact, that was**
12 **mentioned. But to elaborate a little bit, I think**
13 **there is a reason why we didn't start operations in**
14 **those ports until six, seven months later.**
15 Q. What were those?
16 **A. Exactly that those ports are not**
17 **available at the beginning of our operations in**
18 **Cuba.**
19 Q. When Captain Albertini said that the
20 other Cuban ports were not available at the time,
21 did you ask him why?
22 **A. That is not -- I don't -- I did not.**
23 **But -- but the answer was, they're not available.**
24 **-- they're not physically available to begin**
25 **operations. They needed to prep those ports and so**

Page 79

1 **forth.**
2 Q. Are you aware of the fact that other
3 cruise lines were calling on Cienfuegos and
4 Santiago de Cuba --
5 **A. Yes, of course.**
6 Q. -- March 2017 and November 2017?
7 MR. LORENZO: Let her finish asking the
8 questions. You can answer, but please let her
9 finish.
10 **A. Yes.**
11 BY MS. CASEY:
12 Q. And it's your testimony that the
13 decision to -- or I'm sorry. It's your testimony
14 on behalf of Norwegian Cruise Line that Norwegian
15 Cruise Line stopped in Havana only between April or
16 May of 2017 through October of 2017 not because the
17 Norwegian Sky and the Norwegian Sun were vessels
18 that were simply too large to fit in Santiago and
19 Cienfuegos?
20 MR. LORENZO: Objection to form.
21 **A. Could you repeat --**
22 BY MS. CASEY:
23 Q. That may not have been the most clear
24 question I've ever asked.
25 Was the fact that the Norwegian Sky and

Page 80

1 the Norwegian Sun were both large vessels, did that
2 have anything to do with the fact that they did not
3 call on Cienfuegos and Santiago?
4 MR. LORENZO: Objection to form.
5 **A. No.**
6 BY MS. CASEY:
7 Q. Okay. Let's turn to the contracts. Let
8 me ask you this.
9 At the time of between May 2017 and
10 October of 2017, do you know where the Insignia was
11 berthed?
12 **A. No.**
13 Q. Do you know if the Insignia was being
14 used for other itineraries during that period of
15 time?
16 **A. I don't know.**
17 Q. Do you know if the marina was being used
18 during May 2017 through November of 2017?
19 **A. I don't know.**
20 Q. Do you know whether the Regatta was
21 being used between May 2017 and November of 2017?
22 **A. No, I do not know.**
23 Q. What about the Seven Seas Voyager, do
24 you know if it was being used during that period of
25 time, May 2017 through October 2017?

Page 81

1 **A. No, I do not.**
2 Q. Turning to the contracts which is topic
3 V(I) -- I'm not going to go through all of the --
4 MR. LORENZO: Thank you.
5 MS. CASEY: Is everything okay?
6 MR. LORENZO: Yeah, I just want to get
7 it on our screen. I apologize. The contract.
8 MR. POSTMAN: That's the depo notice.
9 MR. LORENZO: The contract, the one that
10 she was just using.
11 MS. CASEY: All right. Gentlemen, just
12 let me know when you're ready.
13 MR. LORENZO: We're ready. Thank you
14 very much. I apologize.
15 BY MS. CASEY:
16 Q. Okay. Sir, I'm not going to go through
17 all of the contracts, but Norwegian Cruise Line
18 Holdings had -- we started with Aries S.A. --
19 Norwegian Cruise Line Holdings Ltd. had contracts
20 with Aries S.A. That's correct, right?
21 **A. Yes.**
22 Q. We looked at one of them.
23 What about Comar, did Norwegian Cruise
24 Line Holdings Ltd. have contracts with Comar?
25 **A. Yes.**

Page 82

1 Q. All right. Can you tell me what Comar
2 is?
3 **A. It's a legal firm that specializes in
4 maritime law and represents Aries.**
5 Q. And it stands for Consultores Maritimos
6 S.A.?
7 **A. I don't remember what it stands for, but
8 maybe, yes.**
9 Q. Who was involved in negotiating the
10 contract with Comar?
11 **A. Norwegian legal counsel.**
12 Q. Who would that be? What person?
13 **A. I believe Mr. Lincoln Vidal.**
14 Q. Anyone else?
15 **A. My contact was Lincoln Vidal for this
16 purpose.**
17 Q. Is Comar an independent law firm or does
18 it have ties to the Cuban Government?
19 MR. LORENZO: Objection to form.
20 **A. That's a question that should be
21 addressed to Comar.**
22 BY MS. CASEY:
23 Q. Were you or Fuego Enterprises
24 responsible for communicating or liaising with
25 Comar on behalf of Norwegian Cruise Line?

Page 83

1 **A. In some cases we did, yes -- I did.**
2 Q. And what would those circumstances be?
3 **A. Either bringing original documents from
4 NCL to Cuba or vice versa, or in some cases
5 requesting Comar to respond or reply to Mr. Vidal's
6 comments or emails or calls.**
7 Q. Who did you talk to over there at Comar?
8 **A. I don't remember the name, but the
9 person in charge of Comar and the lawyer --
10 particular lawyer involved in these transactions.**
11 Q. What about Havanatur, did Norwegian
12 Cruise Line have contracts with Havanatur?
13 **A. Yes.**
14 Q. And what is Havanatur?
15 **A. Havanatur is a travel agency.**
16 Q. What services did Havanatur provide to
17 Norwegian Cruise Line?
18 **A. The excursions.**
19 Q. It arranged excursions for passengers of
20 Norwegian Cruise Line?
21 **A. Yes. You could say yes.**
22 Q. Is it an agency of the Cuban Government?
23 MR. LORENZO: Objection to form.
24 **A. I cannot answer that question.**
25

Page 84

1 BY MS. CASEY:
2 Q. I'm sorry. I don't think I heard you.
3 **A. I don't know.**
4 Q. Who was involved in the negotiation of
5 the contracts with Havanatur?
6 **A. Legal counsels at Norwegian and myself.**
7 Q. Who from Norwegian Cruise Line?
8 **A. Mr. Lincoln Vidal.**
9 Q. Anybody else from Norwegian Cruise Line?
10 **A. Not that I remember.**
11 Q. And what was your involvement?
12 **A. I made suggestions, reviewed the
13 agreements, and negotiated terms.**
14 Q. Were these communications regarding the
15 Havanatur contract negotiations made by email?
16 **A. In my particular case it was in person.**
17 Q. In person with Mr. Vidal?
18 **A. No, in person with the principals of
19 Havanatur.**
20 Q. And what about Mambisa, did Norwegian
21 Cruise Line Holdings enter into any contract with
22 an entity named "Mambisa"?
23 **A. Yes, Consignataria Mambisa.**
24 Q. What is Mambisa?
25 **A. They are the port agent.**

Page 85

1 Q. Okay. What services does Mambisa
2 provide as a port agent?
3 **A. Services related to being the port
4 agent, attending to the cleaning of the ships,
5 the -- I'll have to -- to dig it up a little bit,
6 but they were the port agencies in charge of the
7 operations of the cruise ship when the cruise line
8 actually docked at the Port of Havana.**
9 Q. And is Mambisa an agent for the Cuban
10 Government?
11 MR. LORENZO: Objection to form.
12 **A. I don't know.**
13 BY MS. CASEY:
14 Q. Is Mambisa the port agent for all ports
15 in Cuba?
16 **A. Mambisa is the port agent for the Port
17 of Santiago and the Port of Cienfuegos.**
18 Q. And the Port of Havana?
19 **A. Yes.**
20 Q. Who was involved in the negotiation of
21 the contract with Mambisa?
22 **A. I believe Norwegian Cruise Line
23 Holdings' legal department.**
24 Q. And would that be Mr. Vidal as well?
25 **A. Yes.**

Page 86

1 Q. Anybody else?
2 **A. Mr. Vidal was my point of contact, so I**
3 **don't know of anybody else.**
4 Q. Were you involved in the negotiation of
5 that contract?
6 **A. No, I was not.**
7 Q. And what about a company called Empresa?
8 Did Norwegian Cruise Line have any contracts with
9 an entity named "Empresa"?
10 **A. I don't know what that entity is.**
11 Q. And what about an entity named
12 "Sericmar." Do you know what that is?
13 MR. LORENZO: I'm sorry, Ms. Casey, can
14 you repeat that name?
15 BY MS. CASEY:
16 Q. S-E-R-I-C-M-A-R.
17 **A. Yes.**
18 Q. What is that?
19 **A. That is an entity that if you're looking**
20 **for personnel that you want to -- Cuban**
21 **personnel -- qualified personnel that you want to**
22 **work onboard the ship, that's the entity**
23 **responsible for providing those services or those**
24 **individuals or those qualified individuals.**
25 Q. All right. Is that entity an entity of

Page 87

1 the Cuban Government?
2 MR. LORENZO: Objection to form.
3 **A. I don't know.**
4 BY MS. CASEY:
5 Q. Was there a contract with Sericmar?
6 **A. No, not that I know of.**
7 Q. Besides these contracts that we
8 discussed right now, were there any other contracts
9 between Norwegian Cruise Line Holdings that
10 Norwegian Cruise Line Holdings entered into in
11 Cuba?
12 **A. No.**
13 Q. Let me take a small break, but I think
14 I'm pretty close to wrapping up.
15 You know, I did want to ask you, with
16 respect to the discussion that we had regarding the
17 itineraries and Cuban Government authorizations to
18 use the different ports in Havana -- and in other
19 cities in Cuba, who would be the people at
20 Norwegian Cruise Lines who would have the most
21 knowledge about those topics?
22 **A. Can you repeat the question, please.**
23 Q. Sure.
24 Who would be the persons at Norwegian
25 Cruise Lines who would be most knowledgeable about

Page 88

1 topic IV(D)?
2 **A. I need to look at that.**
3 MR. LORENZO: Ms. Casey, can you repeat
4 your question?
5 BY MS. CASEY:
6 Q. Sure.
7 Who are the individuals at Norwegian
8 Cruise Line Holdings that would be most
9 knowledgeable about topic IV(D)?
10 MR. LORENZO: Objection to form.
11 **A. That would be me and Mr. Mario Parodi.**
12 BY MS. CASEY:
13 Q. Anybody else that you can think of?
14 **A. I don't know of anybody else.**
15 MS. CASEY: All right. Let's take a
16 short break, five-minutes.
17 MR. LORENZO: Stephanie, did you say B
18 has in "boy" or D as in "David"?
19 MS. CASEY: D as in "David."
20 MR. POSTMAN: So, Stephanie -- we don't
21 have to be on the record for this. So
22 obviously you're saying you're almost done
23 with the 30(b)(6). Do you want to take a
24 lunch break and do the individual or what's
25 your plan?


Page 89

1 MS. CASEY: You know, that makes sense.
2 That makes sense.
3 MR. POSTMAN: So you'll come back and
4 let us know if you're done with the 30(b)(6).
5 And when you tell us that, then we'll take a
6 little lunch break if that makes sense.
7 MS. CASEY: Yeah, that would work
8 perfectly. So let's do that. Five minutes.
9 THE VIDEOGRAPHER: We're going off the
10 record at 12:02 p.m.
11 (Break from 12:02 p.m. to 12:11 p.m.)
12 THE VIDEOGRAPHER: We are back on the
13 record. The time is 12:11 p.m.
14 BY MS. CASEY:
15 Q. Sir, can I direct your attention again
16 back to Exhibit 14, if you could pull that up.
17 **A. Of what?**
18 Q. Exhibit 14 -- I'm sorry.
19 (Unintelligible cross-talking)
20 THE STENOGRAPHER: I can't hear
21 anything, so.
22 MS. CASEY: I can't hear either. I'm
23 hearing voices, but I can't understand.
24 MR. LORENZO: No worries. We've got the
25 document. Thank you, Stephanie.

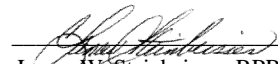
Page 90

1 BY MS. CASEY:
 2 Q. Sir, could you look at Exhibit 14,
 3 page 10, and let me know when you have that up.
 4 A. Okay.
 5 Q. Do you have that?
 6 A. Okay. I have it here.
 7 Q. Sir, will you agree with me that
 8 starting in November 2017, Cienfuegos and Santiago
 9 were available to NCL ships?
 10 A. Yes.
 11 MS. CASEY: Okay. That's all I have for
 12 the (b)(6); so I think we can go off. We'll
 13 discuss lunch.
 14 THE VIDEOGRAPHER: Okay. So we're going
 15 off the record. The time is 12:13 p.m.
 16 (Lunch from 12:13 p.m. to 1:03 p.m.)
 17 THE VIDEOGRAPHER: We are back on the
 18 record. The time is 1:03 p.m.
 19 MR. LORENZO: Ms. Casey, thank you.
 20 On behalf of Norwegian, we have no
 21 redirect for the witness. Thank you very
 22 much.
 23 And we'll read.
 24 THE VIDEOGRAPHER: Okay. So we are
 25 going off the record at 1:03 p.m.

Page 91

1 (The reading and signing of this
 2 deposition was not waived.)
 3 (Deposition concluded at 1:03 p.m.)
 4
 5
 6 CERTIFICATE OF OATH
 7
 8 THE STATE OF FLORIDA:
 9 SS.
 10 COUNTY OF MIAMI-DADE:
 11
 12
 13 I, Lance W. Steinbeisser, Registered
 14 Professional Reporter, Notary Public, State of
 15 Florida, certify that HUGO M. CANCIO personally
 16 appeared before me and was duly sworn on
 17 November 12, 2020.
 18 Signed this 24th day of November, 2020.
 19
 20
 21 
 22 Lance W. Steinbeisser, RPR
 23 NCRA-Certified Stenographic Reporter
 24
 25 Notary Public - State of Florida
 My Commission No. GG064258
 My Commission Expires: May 4, 2021

Page 92

1 CERTIFICATE OF REPORTER
 2
 3
 4 I, Lance W. Steinbeisser, Registered
 5 Professional Reporter, certify that I was
 6 authorized to and did stenographically report the
 7 deposition of HUGO M. CANCIO, pages 1 through 94;
 8 that a review of the transcript was requested; and
 9 that the transcript is a true and complete record
 10 of my stenographic notes.
 11 I FURTHER CERTIFY that I am not a
 12 relative, employee, attorney, or counsel of any of
 13 the parties, nor am I a relative or employee of any
 14 of the parties' attorney or counsel connected with
 15 the action, nor am I financially interested in the
 16 action.
 17
 18 DATED this 24th day of November, 2020.
 19
 20
 21 
 22 Lance W. Steinbeisser, RPR
 23 NCRA-Certified Stenographic Reporter
 24
 25

Page 93

1 November 24, 2020
 2 HUGO M. CANCIO
 3 c/o Richard C. Lorenzo, Esquire
 4 richard.lorenzo@hoganlovells.com
 5 IN RE: HAVANA DOCKS VS. NORWEGIAN CRUISE
 6 CASE NO.: 19-23591-CIV-BLOOM/LOUIS
 7
 8 This letter is to advise that the transcript for
 9 the above-referenced deposition has been completed
 10 and is available for review. Please contact our
 11 office at (305)632-4464 to make arrangements for
 12 read and sign, or sign below to waive review of
 13 this transcript.
 14 It is suggested that the review of this transcript
 15 be completed within 30 days of your receipt of this
 16 letter.
 17 The original of this transcript has been forwarded
 18 to the ordering party, and your errata, once
 19 reviewed, will be forwarded to all ordering parties
 20 for the inclusion in the transcript.
 21
 22 Sincerely,
 23
 24
 25 Lance W. Steinbeisser, RPR
 NCRA-Certified Stenographic Reporter
 Steinotype, Inc.
 PO Box 531108
 Miami Shores, Florida 33153-1108
 I do hereby waive my signature.
 HUGO M. CANCIO

1 ERRATA SHEET
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
2 IN RE: HAVANA DOCKS VS. NORWEGIAN CRUISE
CASE NO. 19-23591-CIV-BLOOM/LOUIS
3 WITNESS: HUGO M. CANCIO
TAKEN: NOVEMBER 12, 2020

4
5 PAGE LINE CHANGE REASON FOR CHANGE

6	_____		
7	_____		
8	_____		
9	_____		
10	_____		
11	_____		
12	_____		
13	_____		
14	_____		
15	_____		
16	_____		
17	_____		
18	_____		
19	_____		
20	_____		

21 Under penalties of perjury, I declare that I
have read the foregoing document and that the facts
22 stated in it are true.
23 _____
Date HUGO M. CANCIO

24
25

A				B
a.m 1:17 5:6	agreements 21:10 66:1	86:1,3 88:13,14	Asset 45:24 48:7	b 21:20,21 56:18
44:23,24,24	84:13	apologies 72:18	48:14 49:24	88:17 90:12
45:1 65:20,21	ahead 18:22	apologize 56:12	50:4	back 17:15 44:25
65:21,23	air 48:17	81:7,14	assist 16:21	65:22 68:4
able 9:10 28:5,10	Aires 67:5	APPEARANC...	assume 37:9	70:20 75:24
38:5 67:17	airlines 45:21	2:1	58:14	89:3,12,16
above-referenc...	49:4 50:1	appeared 91:16	assuming 30:20	90:17
93:6	airplanes 46:19	application 51:6	attend 37:10	background
accept 38:5	Albertini 77:12	appropriate	attending 85:4	18:25
accepting 37:25	78:3,7,19	44:16	attention 89:15	Balmori 2:17
accurate 22:6	Alhambra 2:6	approval 69:6,20	attorney 12:21	5:25
25:6,7 48:24	allow 53:24 64:8	approve 62:23	55:16 92:12,14	Barlow 3:12 5:9
accurately 23:21	allowed 27:6,8,17	approved 45:24	attorney-client	Barry 3:9 6:5
acting 22:21 66:3	27:21 32:7	69:11 70:22	14:24 15:11,16	13:11
action 7:3 8:25	allows 48:9	76:15	15:25	barry.postman...
92:15,16	amendment 4:8	April 79:15	attorneys 9:4	3:9
add 14:9 50:24	23:24 24:2	architecture	13:3 14:16 15:8	based 14:22
address 47:20	American 32:20	60:25	15:21,22 16:13	basing 76:3
addressed 47:4	32:21	area 60:7,9	18:20 54:24,25	basis 74:13 76:2
82:21	Americans 45:19	areas 60:17	attractions 60:11	77:6
administered	50:1	Ariel 21:7,13	60:13,15 61:5	Bay 39:3
6:10	anchors 42:15,22	Aries 8:17 52:21	attractive 60:7,9	Beach 2:12 3:10
Administration	angle 25:22	52:24 53:2,4,17	authorities 77:10	began 74:4 77:5
46:21 49:25	answer 9:9 13:5	66:22,23,24	77:11 78:1	beginning 13:20
Administration's	13:18 14:20,22	67:2 69:16,20	authorizations	54:3 64:24 65:1
45:18 48:15	15:13 16:2	70:22 77:12	87:17	77:15,18 78:9
49:1	18:15,16,18,21	81:18,20 82:4	authorize 76:9	78:17
advise 93:5	18:22,24 27:12	arranged 34:15	authorized 12:3	behalf 2:2,9,14
affirm 6:11	27:19 32:14	83:19	27:13 32:19,21	3:1,7 5:14,23
agencies 85:6	34:9 35:10,23	arrangements	43:8 45:21	6:5 11:24 13:11
agency 34:17,24	36:10,17 38:15	93:7	46:20 48:12,25	13:13,24 14:1
83:15,22	42:12 43:6	arrivals 41:15	49:5,23,25	16:6 21:9 26:25
agent 22:21 23:1	50:25 58:13	arrive 30:24	59:10,11 64:13	28:17 34:20
84:25 85:2,4,9	61:21 67:11	arriving 41:21	64:18,22 70:1	46:11 47:7,24
85:14,16	75:16,22,24	art 17:25 18:2	70:23 74:2,14	51:22,24 52:3
ago 8:23,25	78:4,23 79:8	59:23	74:23 76:4,11	52:20 56:19,24
11:21	83:24	Aside 63:12,19	76:17 92:6	57:3,6,18 66:3
agree 90:7	answered 49:21	asked 13:19 15:1	available 38:24	74:21,22 79:14
agreement 4:7,9	63:12 75:22	40:12 54:3	48:8 63:20,22	82:25 90:20
17:6,7 18:8,9	answering 9:8	79:24	63:25 75:6,9	believe 11:21
20:6,8,10,11,12	anticipating	asking 9:7,9 20:9	76:14,16,22	12:24 19:2 21:1
20:15 21:4 22:8	10:20	32:4 46:10,15	77:4,8,22 78:8	33:1 34:24
22:17,21 23:13	Antilla 39:3	46:16 47:8 48:4	78:17,20,23,24	41:21 47:3,15
24:3 66:21 75:4	anybody 16:16	50:9 59:15	90:9 93:6	49:21 53:9,25
75:11 76:11,12	21:2 43:20 44:4	60:19 68:2 79:7	Avenue 2:18 3:10	54:20 61:14
76:15 77:20	62:8 78:6 84:9	asserting 13:25	aware 58:15 64:8	62:6 65:6 66:11
		14:1,3	79:2	

<p>69:17 71:14 82:13 85:22 benefit 9:2 berthed 80:11 berthing 52:19 53:16 best 8:22 20:5 67:21 better 9:22 25:22 67:19 beyond 17:12 18:4 bit 78:12 85:5 Bob 5:16 bob@colson.com 2:4 booth 30:16 bottom 72:3 73:5 boundaries 63:16 Box 93:18 boy 56:18 88:18 brand 29:25 72:15 Brazil 67:21 breach 8:5 break 44:17,19 44:24 51:5 59:14 65:13,21 70:1 74:2 87:13 88:16,24 89:6 89:11 Brickell 2:18 bring 16:20 bringing 83:3 building 25:2,4 27:7 28:11 33:23 34:6 buildings 60:18 bullet 68:14 bus 34:10 buses 34:15 business 17:24 27:16 51:8 buy 31:17 32:21</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>C 2:15 21:20,22</p>	<p>93:2 C-A-N-C-I-O 6:24 c/o 93:2 call 42:2,3,4 66:11 70:2 74:3 74:25 80:3 called 17:24 86:7 calling 5:16 79:3 calls 83:6 camera 14:10 Cancio 1:14 4:2 5:3 6:9,17,24 20:21 75:22 91:15 92:7 93:2 93:21 94:3,23 capabilities 35:5 35:21 36:15,21 36:22,24 37:4,8 37:13,21 38:19 capable 37:25 capital 59:21 63:14 Captain 77:12 78:3,7,19 case 1:2 84:16 93:4 94:2 cases 83:1,4 Casey 2:5 4:3 5:13,14 6:16 10:2,12,16 11:4 11:10,13 12:15 13:1,12 14:5,14 14:21 15:3,5,14 15:18 16:3 18:17 19:4,12 19:16,19 23:4,9 27:15,23 28:8 31:23 32:3,16 33:9 34:14,21 35:13,19 36:1,6 36:13,19 37:23 38:11,17,22 39:2,6,10,15,22 40:9 41:4,17,24 42:7,14,21 43:4 44:12,18 45:2</p>	<p>46:9 47:5 50:15 50:23 52:9,18 53:11 54:8,11 54:22 56:2,6,9 58:6,17 62:1,21 63:2 64:15 65:3 65:15,17,24 66:9 68:10,13 69:24 70:14,16 70:19 71:2,12 71:19,24 72:1,5 72:6,8 74:9,18 75:7,18 76:1,20 77:1 79:11,22 80:6 81:5,11,15 82:22 84:1 85:13 86:13,15 87:4 88:3,5,12 88:15,19 89:1,7 89:14,22 90:1 90:11,19 categories 45:23 50:2 63:18 category 44:15 cause 6:12 center 61:2 CEO 58:19 certain 11:24 CERTIFICATE 4:14,15 91:6 92:1 CERTIFICAT... 4:12 certify 91:15 92:5,11 chance 23:11 CHANGE 94:5,5 changes 23:18 70:6 73:25 94:1 charge 43:17 49:2 66:24 83:9 85:6 chase 72:19 check 53:24 choice 63:4 choose 55:23 63:10</p>	<p>choosing 59:16 churches 60:24 Cienfuegos 35:24 36:2,11 37:15 37:16 39:25 40:3 53:14 67:3 68:25 69:7 70:24 73:13,17 79:3,19 80:3 85:17 90:8 Circle 2:6 circuit 7:21 8:2 circumstances 83:2 cities 60:23 61:18 73:12 87:19 citizen 28:9 city 25:4 59:17 59:20 60:1 61:3 61:8,9 63:13,17 63:17,23 64:9 65:11 civil 7:20 cleaning 85:4 clear 14:6 39:18 40:1,21 41:8,12 41:22 42:1 79:23 clients 29:18 close 60:3,13 87:14 Coast 78:2 Cole 3:8 6:6 colleague 5:24 colonial 61:2 COLSON 2:3 Comar 81:23,24 82:1,10,17,21 82:25 83:5,7,9 come 27:13 42:24 42:25 89:3 comfort 44:16 comments 83:6 commerce 49:2 Commission 91:24,24 communicated</p>	<p>62:10 communicating 82:24 communication 15:7 communications 15:20 58:5 84:14 companies 8:8,9 17:11,14,16,18 company 8:17 17:7,9 18:3 21:8 58:20 86:7 complete 71:11 71:13 92:9 completed 93:6,9 comply 63:18 concentration 59:25 concerned 27:20 35:11 conclude 40:19 concluded 91:3 conclusion 41:6 conclusions 46:16 conduct 28:17 45:8,15 46:4,25 47:13,18 48:3 48:22 49:11,19 51:8 conducted 5:7 conjunction 46:20 connected 92:14 connection 27:2 Conquistadors 61:3 consider 61:18 considered 59:19 Consignataria 84:23 consists 48:23 consultant 17:6 22:24 23:1,3 consulted 62:15 Consultores 82:5</p>
---	---	---	--	--

<p>contact 61:15 82:15 86:2 93:6 contain 36:3,8,14 36:20 38:8 contained 35:7 37:3 contains 35:3,16 39:24 contend 74:20 contention 45:6 45:13 46:2,17 47:17,25 49:9 49:18 context 7:15 continue 76:8 continued 76:13 contract 8:5 19:8 19:25 67:9,10 69:15 81:7,9 82:10 84:15,21 85:21 86:5 87:5 contracts 80:7 81:2,17,19,24 83:12 84:5 86:8 87:7,8 Control 45:25 48:7,14 49:24 50:4 conversation 15:2 conversations 43:7,9,21 44:5 77:19 copy 54:9 56:3 Coral 2:7,18 corner 71:24 corporate 1:14 13:21,23 57:1 corporation 1:5 5:4,15,19 17:19 correct 9:21,23 10:6 12:7 25:1 25:10,11 30:25 31:5,11 33:8,24 33:25 51:23 67:17 69:4,14 69:21,23 71:25</p>	<p>81:20 correctly 48:18 counsel 5:10 6:1 6:2 13:7 55:10 82:11 92:12,14 counsels 84:6 country 41:22 42:2,4 59:22 72:17 county 7:22 91:10 couple 11:21 course 44:18 56:6,6 72:25 79:5 court 1:1 5:7,11 7:22,22 8:2 9:10,14 13:10 cover 12:17 covered 9:4 cross-talking 89:19 cruise 1:8 3:2 5:4 5:23 7:2,7 13:14 16:6,17 17:5,8 18:10 19:8 20:2,24 23:15,23 26:23 27:4 28:3,10,18 28:20,24 29:4,6 29:7,10,11,15 29:18,22,24 30:3,5,13 32:10 32:21,24 33:3 33:18 36:25 37:25 38:5 39:17 40:19 41:7,15 44:9 45:21 46:19,23 47:8,10,23,24 47:25 48:17,20 48:25 49:4,22 50:1 51:11 52:4 52:4,10,12,21 53:18,22,25 54:25 55:11 57:2,18 58:9</p>	<p>59:12 61:17 62:3,16,23 63:4 63:10,23 64:1,2 64:7,8,13,18,22 65:4,11 66:22 68:19 69:15,18 70:3,23 71:8 72:16,21,23 73:2,4 74:3,4 74:14,23,24 77:5 78:7,10 79:3,14,15 81:17,19,23 82:25 83:12,17 83:20 84:7,9,21 85:7,7,22 86:8 87:9,10,20,25 88:8 93:4 94:2 crises 52:6,15 59:20 cruising 70:3 74:4 77:5 Cuba 17:25 18:2 32:25 35:7,16 35:25 36:8,12 36:15,20 39:17 40:20 41:8 42:15,23 43:13 45:8,15,16,17 46:4,5,19,21 47:1,14,19 48:3 48:12,23 49:6 49:11,20 50:2 51:8,12,17,21 52:6,15 53:14 57:11 59:8,20 59:22,24 61:13 64:3,23 65:2,5 67:6 68:24 69:1 69:8 70:3,24 72:24 73:3,12 73:13,18 74:4 74:15,25 77:6 78:11,18 79:4 83:4 85:15 87:11,19 Cuban 22:23</p>	<p>27:16 28:9 32:5 34:17 35:1,20 36:14 37:12 41:11,18 42:8 42:11,17,23 45:20 51:17,20 52:5,13,14 53:4 64:22 66:24 68:22 69:21 70:1 74:2,13,24 76:5,24 77:4,10 77:11 78:1,1,4 78:8,20 82:18 83:22 85:9 86:20 87:1,17 Cubans 48:16 cultural 59:22,24 59:25 63:15 curious 26:20 currency 33:10 33:11,15,19 current 63:19 customs 31:6,8 35:4,8 36:7,8 37:4 38:13 39:19 40:1,21 41:8,12,23 42:1 42:16,24 cut 72:18</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 58:23 59:1,2 88:18,19 Dan 5:25 54:20 55:7,9 56:14 Daniel 2:17 3:2 5:24 daniel.balmori... 2:17 date 10:19,20 12:23 19:10 20:3,4 67:23 68:1 72:16 94:23 DATED 92:18 dates 73:14 David 58:24 59:2</p>	<p>88:18,19 day 91:18 92:18 days 11:21 93:9 de 4:10 35:25 36:12 38:3,7,12 38:18 53:14 67:6 69:1,8 70:24 73:13,18 79:4 dealings 22:22 deciding 61:16 61:18 decision 18:12 55:23 56:1 59:7 59:19 62:6,16 62:22 79:13 decisions 19:1 61:22,24 62:4 declare 94:21 defendant 1:9 2:14 3:1 7:3,6 45:9 55:25 56:1 66:2 Defendant's 45:6 49:9 defending 13:13 defense 46:23 47:12 48:20 Del 19:3 20:23 58:19 department 49:2 49:3,3 54:1,16 58:5 62:15 85:23 departments 62:2 depicted 24:23 25:17 depo 19:15 23:6 81:8 deposed 8:25 deposition 1:13 5:2,6 7:5,12 8:21,24 10:5,7 10:18 11:16 12:19 13:13 14:6,7,17 15:9</p>
--	---	---	---	--

<p>15:23 16:4,5,10 16:14,18,25 24:19 46:12 49:8 50:9 54:3 54:10,14 55:20 56:25 57:20 71:14,22 91:2,3 92:7 93:6 deputy 6:2 describing 61:6 description 4:5 25:6,7 designated 47:23 57:20 destinations 41:16 determine 32:7 dfarkas@ncl.c... 3:3 difference 22:25 different 10:19 58:7 87:18 difficult 9:14 14:12 dig 85:5 direct 4:3 6:15 70:12 89:15 discuss 90:13 discussed 35:2 87:8 discussion 24:8 87:16 disembark 30:12 30:15 disembarked 29:3,9,23 disembarking 32:20 DISTRICT 1:1,1 dock 55:24 62:18 63:23 64:8 docked 85:8 Docks 1:5 5:3,14 5:19 93:4 94:2 document 10:22 11:6 17:1,2 19:24 20:16</p>	<p>22:1 23:18 54:6 66:14,18,20,21 67:16,22,23 68:1,5 70:12 71:6,7,11,13 72:20 73:1 89:25 94:21 documents 16:9 16:20 45:5 47:16,24 48:19 49:8,17,17 50:5 50:5,7,13,16,19 54:4,5 83:3 doing 13:9 24:10 26:25 27:2 28:20 34:11 57:17 door 28:4 34:7 34:13 doubt 71:12 duly 6:10 91:16</p> <hr/> <p style="text-align: center;">E</p> <p>effect 22:9 23:24 efforts 51:11 EIDSON 2:3 either 7:7 9:22 24:11 34:10 50:8 83:3 89:22 elaborate 60:15 78:12 elevator 34:3 Ellie 3:13 5:17 10:24 19:12 23:4 25:15 66:10 70:9 email 84:15 emails 83:6 embarked 73:4 employed 6:25 7:2 employee 57:8 92:12,13 employees 21:11 45:9 56:1,16 58:9 Empresa 86:7,9</p>	<p>endeavor 57:11 ended 22:17 engage 45:18,22 48:15 49:5 75:10 engaged 53:9 engaging 77:16 enlarge 70:15 enlarged 70:18 enter 19:7 84:21 94:1 entered 20:1 23:14 66:2 69:16 87:10 Enterprises 7:1 8:11 17:10,12 17:19,22 18:4 18:13 19:7 20:1 21:3,12 22:7,12 22:17 23:14,23 24:3 29:14,17 51:6,16,19,24 82:23 entirety 47:10 entitled 14:25 entity 8:15 13:21 17:24 18:5 53:4 66:3,24 84:22 86:9,10,11,19 86:22,25,25 entrance 27:25 errata 4:17 93:11 94:1 Esquire 2:4,5,10 2:15,17 3:2,4,9 93:2 evident 76:10 exact 11:15 19:10 71:21 exactly 30:9 77:21 78:16 exam 72:14 Examination 1:22 4:3 6:15 EXAMINATI... 4:1 example 32:5</p>	<p>exchange 33:10 33:11,15,19,20 exchanged 33:14 excluding 35:1 excursions 17:8 34:11 83:18,19 execute 61:22 executed 76:11 executive 62:9 executives 78:10 exhibit 4:5 9:25 11:7,11,16,20 19:15,17 23:6,7 24:6,7,17,18,23 25:16 66:7,12 68:11 70:10,21 71:4,20,21 89:16,18 90:2 EXHIBITS 4:4 exit 34:5 experience 40:10 40:16 53:15 expert 46:13 Expires 91:24 explain 74:12 76:2</p> <hr/> <p style="text-align: center;">F</p> <p>facilities 36:8 38:13,24 39:12 40:23 41:14 59:23 facility 42:6 45:15 46:4 59:13 63:5,11 fact 78:11 79:2 79:25 80:2 factors 61:17 facts 45:5,11,13 46:1,16,17,22 47:11,15 48:6 49:8 76:3 94:21 fair 22:20 64:5 64:11 65:7 70:21 far 27:20 35:11 Farkas 3:2 5:25</p>	<p>54:21 55:7,9,12 56:14 57:5,25 filed 8:4 final 65:25 finally 69:10 financially 92:15 find 32:20 49:16 fine 7:9 17:1 finish 9:8 79:7,9 firm 5:22 82:3,17 first 19:5,7,25 20:4 21:15,16 23:24 24:2 26:15 31:2 37:7 42:1 51:25 68:21 69:15 fit 79:18 five 65:15 68:25 68:25 89:8 five-minutes 88:16 flags 29:24 floor 30:25 31:10 31:13 33:24 34:2 Florida 1:1,19 2:7,12,18 3:5 3:10 7:17 91:8 91:15,23 93:18 fluent 67:12 font 71:5 foregoing 94:21 foreign 41:21,22 42:2 45:24 48:7 48:13 49:24 50:4 forgot 29:13 67:11 form 18:14 27:11 27:18 28:6 31:19 32:1,13 33:7 34:8,19 35:9,17,22 36:4 36:9,16 37:20 38:9,14,20,25 39:4,8,13,20 40:7 41:2,10,20</p>
--	---	---	---	---

<p>42:5,10,18 43:2 47:2 50:14,18 52:7,16 53:8 54:19 58:1,2,12 61:20 62:19,25 64:10,25 69:22 70:25 74:5,6,16 75:2,15 76:7,23 79:20 80:4 82:19 83:23 85:11 87:2 88:10 forth 61:11 79:1 forwarded 93:11 93:12 four 12:7 69:6,11 Frances 37:24,25 38:1,7,12,18 Frank 19:2 58:19 front 11:6 19:24 23:12 25:8 34:7 34:13 56:4 71:4 Fuego 6:6 7:1 8:11 13:22 17:10,12,17,19 17:21 18:4,13 19:7 20:1 21:3 21:9,12 22:7,12 22:17 23:14,22 24:3 29:14,17 51:5,16,19,24 82:23 full 6:22,23 fully 45:21 46:19 48:12,25 49:4 49:22,24 76:17 FURTHER 92:11 Futterman 3:13 5:17 11:1 19:14 23:6</p> <hr/> <p style="text-align: center;">G</p> <p>Gables 2:7,18 galleries 59:23 gangway 30:20 general 6:1,2</p>	<p>48:11 gentleman 55:6 Gentlemen 81:11 GG064258 91:24 give 6:11,21 9:12 9:22 12:23 13:8 43:11 70:14 given 16:5 giving 15:19 16:21 go 9:3 11:6 15:2 17:15 18:19,22 20:14 21:15,25 26:18,22,22 30:15,20 31:3,6 32:7 33:24 34:10 63:15 67:10,22 68:4 70:13 71:5 73:5 76:12 81:3,16 90:12 goes 57:9,12 61:16 going 7:6 9:7,7 10:3,21 11:1 12:6 13:4 14:9 14:11 18:18 23:17 24:9,10 44:13,22 45:3 48:9 54:4 56:13 61:23 65:19 66:10,11,14 70:20 81:3,16 89:9 90:14,25 good 5:1,13,21 6:3,4,17,19,20 29:1 Gorda 39:11 Government 22:23 34:18 42:12,17,23 45:22 48:13 51:3,7,12,17,21 52:5,13,14 64:22 70:1 74:2 74:14,24 76:5 76:25 82:18</p>	<p>83:22 85:10 87:1,17 great 44:20 65:18 ground 33:24 34:2 grounds 15:14,15 16:2 Guard 78:2 guess 13:8,25 guidance 49:23</p> <hr/> <p style="text-align: center;">H</p> <p>happy 15:1 harbor 25:5 hard 9:11 54:9 56:3 Havana 1:5 5:3 5:14,19 24:11 24:12,25 26:4 26:16 28:14,23 29:3,9,23 30:3 30:6,14 32:11 33:4,5,11,15 34:6,12 35:3,12 35:12,15 36:3 37:2,14 39:7,25 40:2 43:17 45:14 46:3,24 47:13,18 48:2 49:19 53:5,7,13 53:19 59:7,17 59:20,21 60:1,3 60:4,6,8,14,18 60:21,22 61:1,1 61:2,6,8,9 62:17,18,24 63:5,6,10,11,13 63:17,23 64:6,9 64:11,16,17,21 65:12 66:25 67:1 68:23,25 69:4,7,11 70:2 70:24 73:13,16 74:3,15 75:1,4 76:6,19 79:15 85:8,18 87:18 93:4 94:2</p>	<p>Havanatur 34:16 34:17,20,22,23 83:11,12,14,15 83:16 84:5,15 84:19 head 9:13,13 43:16 header 72:13,19 headquarter's 57:8 hear 14:13 89:20 89:22 heard 84:2 hearing 89:23 HICKS 2:3 historical 60:1,22 61:9 history 61:1,4 Hogan 2:15 5:22 Holdings 1:8 5:5 5:23 7:3,7 20:2 20:24 23:15 41:15 47:8 55:1 55:11 66:22 69:16 71:8 81:18,19,24 84:21 87:9,10 88:8 Holdings' 54:1 85:23 Homestead 8:4 hopefully 7:11 hour 44:14 Hugo 1:14 4:2 5:2 6:5,9,23 20:21 91:15 92:7 93:2,21 94:3,23</p> <hr/> <p style="text-align: center;">I</p> <p>identical 10:18 identification 10:1 19:18 23:8 66:8 identified 11:24 identify 14:11,13 50:10,13,16</p>	<p>57:24 II(B) 12:10 35:1 immigration 30:16 31:4 35:4 35:7,16,21 36:3 37:3 38:8 39:19 40:2,21 41:9,12 41:22 42:1,24 43:8,14,16,21 43:25 44:5,8 immigrations 42:16 78:2 in-house 54:25 include 53:18 59:7,19 included 53:16 62:24 includes 73:11 inclusion 93:12 incorrect 10:6 independent 82:17 INDEX 4:1,4,12 individual 88:24 individually 13:21 18:9 individuals 57:4 86:24,24 88:7 Industries 6:6 13:22 information 40:6 53:22 70:11 initial 6:24 inside 30:9,19 Insignia 68:15,23 73:9,20 80:10 80:13 Installation 72:16 instruct 13:5 14:19 16:1 18:21 instructing 14:22 15:12 intentions 48:15 interaction 45:19 48:16</p>
--	--	---	--	--

<p>interest 60:18 interested 92:15 internally 19:2 57:12 international 34:23 introduce 5:10 involved 51:2,10 51:14 52:19 56:1 62:3,5 82:9 83:10 84:4 85:20 86:4 involvement 84:11 Isla 38:3,7,12,18 island 64:23 74:15,25 issue 7:24,25 8:1 item 21:16 23:19 itineraries 53:17 59:8 61:13 62:23 72:24 73:3 80:14 87:17 itinerary 39:18 39:24 40:20 41:8 42:3 61:19 73:11,12 IV(B) 12:10 44:11 45:4 50:17,20 53:23 54:10,18 56:15 56:18 58:10 IV(D) 12:10 55:21 58:23 88:1,9</p> <hr/> <p style="text-align: center;">J</p> <p>Jacksonville 2:12 January 20:11 Jennifer 62:11 Jerry 3:14 5:18 job 32:19 57:10 61:22 Johnson 3:14 5:18 Join 14:19 15:12</p>	<p>16:1 74:7 joined 5:24,25 July 68:3 70:22 jut 25:5 Juventud 38:3,8 38:12,19</p> <hr/> <p style="text-align: center;">K</p> <p>kind 7:19 41:5 kinds 31:15 Kissane 3:8 6:6 know 7:21 9:11 9:12,18,21 10:8 10:14 11:7 17:1 18:3,15 19:1,20 20:10 23:10 24:13 25:12,21 26:13 27:12 32:18 34:9 35:10,23 36:5 36:10,17,23 37:24 38:15,16 38:18,21,23 39:1,5,12,16 42:13,19,20 44:15 50:5,7 51:19 52:12 53:22 54:5,6 56:10,12 57:9 57:12 59:23 62:2,5,8,20,22 63:1,13 67:11 80:10,13,16,17 80:19,20,22,24 81:12 84:3 85:12 86:3,10 86:12 87:3,6,15 88:14 89:1,4 90:3 knowledge 45:10 54:17 56:17 58:10 87:21 knowledgeable 56:20,22 57:13 87:25 88:9</p> <hr/> <p style="text-align: center;">L</p> <p>la 38:3,7,12,18</p>	<p>39:11 lady 62:9 Lakeview 3:10 Lance 1:22 5:8 75:21 91:13,22 92:4,21 93:16 land 30:12 landmark 60:23 large 75:13 79:18 80:1 law 5:22 41:19 42:8,13 82:4,17 lawful 45:8,16 46:5,25 47:14 47:19 48:3,22 49:11,20 lawsuit 7:16,19 7:20 8:3,4,7 lawyer 48:5 83:9 83:10 lawyers 12:20 46:8 47:21 lead 40:19 41:6 55:10 leave 33:23 34:6 left 45:3 legal 46:13,15 54:1,16 58:5 62:15 82:3,11 84:6 85:23 let's 34:25 39:25 44:11,18 55:21 58:23 59:14,15 68:24 80:7 88:15 89:8 letter 4:7,9,16 21:4 22:16 24:2 93:5,10 LETTERS 4:12 liaising 82:24 license 51:3,7,11 51:16,20 52:5 licenses 52:2,14 Lincoln 3:4 6:1 54:20,23 56:14 82:13,15 84:8 line 1:8 3:2 5:4</p>	<p>7:3,7 16:17 17:5 18:10 19:9 20:2,24 23:15 28:3,18,21 29:11,24 30:3,6 30:13 32:10 33:19 40:20 46:23 47:8,10 47:23,24 48:20 52:4 53:25 54:25 55:11 57:18 58:9 61:17 62:3,16 64:13,22 65:4 65:12 66:22 69:15,18 70:23 71:8 72:21,23 73:2,4 74:3,4 74:14,23,24 77:5 78:7 79:14 79:15 81:17,19 81:24 82:25 83:12,17,20 84:7,9,21 85:7 85:22 86:8 87:9 87:10 88:8 94:5 Line's 47:25 51:11 63:4 68:19 lines 5:23 13:14 16:7 17:8 23:23 27:4 29:7,15,18 36:25 41:15 44:9 45:21 46:19 48:17,25 49:4,22 50:1 52:4,10,12,21 53:18,22 57:2 59:12 62:23 63:10 64:1,2,18 70:3 78:10 79:3 87:20,25 list 22:7 listed 21:9 22:11 22:15 24:1 68:14 litigation 37:1</p>	<p>little 58:7 72:13 72:19 78:12 85:5 89:6 LLP 2:15 located 30:8 32:11 60:3,13 location 30:10 55:24 62:17 long 65:14 look 19:21,22 21:21 23:11 27:5 66:13,17 67:8 71:3 72:9 88:2 90:2 looked 54:6,7 81:22 looking 22:3 25:2 25:3,10 27:7 28:22 54:10,14 72:1 86:19 looks 23:18 54:5 Lorenzo 2:15 5:21,22 12:13 13:15,15 14:3 14:18 15:10,24 18:14 27:11,18 28:6 31:19 32:1 32:13 33:7 34:8 34:19 35:9,17 35:22 36:4,9,16 37:20 38:9,14 38:20,25 39:4,8 39:13,20 40:7 41:2,10,20 42:5 42:10,18 43:2 44:12,13,20 46:6 47:2 50:14 50:18 52:7,16 53:8 54:8,19 56:2,8 58:2,12 61:20 62:19,25 64:10,25 69:22 70:14,18,25 71:10,16,23 72:4,7 74:6,16 75:2,15 76:7,23 79:7,20 80:4</p>
---	---	---	--	--

81:4,6,9,13 82:19 83:23 85:11 86:13 87:2 88:3,10,17 89:24 90:19 93:2 lot 7:24 8:1 61:5 70:11 Louis 8:17 Lovells 2:15 5:22 lower 25:9 71:24 lunch 88:24 89:6 90:13,16 lvidal@ncl.com 3:4	62:6 88:11 maritime 82:4 Maritimos 82:5 marked 9:25 10:4 19:17 23:7 66:7 marketing 30:2 Marmanillo 62:13 Martinez 2:4 5:16 master 4:8 21:4 22:16 24:2 Matanzas 38:23 38:24 materials 30:2 matter 5:3 mean 36:24 37:7 37:9 40:11 42:19 75:8 meaningful 45:19 48:16 means 35:3 medical 35:4,8 36:14,20,22,24 37:4,8,10,13,21 38:19 meet 55:2,12,14 meeting 14:16 meetings 16:12 44:7 55:5 78:2 78:3 member 42:11 mention 76:8 mentioned 55:7 56:13 61:10 75:5 78:12 met 12:20 15:21 Miami 1:19 3:5 93:18 MIAMI-DADE 91:10 mid 28:15,16 middle 6:23 71:17,20 minute 11:2 66:13 70:15	minutes 44:19 65:15 89:8 misstatement 9:20 model 30:5,10 modifications 23:22 moment 59:10 75:11 momentarily 70:20 Monday 12:24 13:3 14:15 money 7:24,25 8:1 33:14,19 months 78:14 monuments 60:17,24 61:10 morning 5:1,13 5:21 6:3,4,17 6:19 moving 18:24 museums 59:23 60:24 61:10	47:13,18 48:2 48:22 49:11,19 need 13:8 16:25 37:11 38:2 41:25 52:1,4 70:13 88:2 needed 78:25 needs 69:19 negotiated 84:13 negotiating 82:9 negotiation 84:4 85:20 86:4 negotiations 84:15 neither 55:14 never 32:22 33:4 37:16,17 Nipe 39:3 nod 9:13 North 2:11 Northwest 3:5 Norwegian 1:8 3:2 5:4,23 7:2,7 7:8 11:22 12:3 12:20 13:14,25 14:3 16:6,17 17:5,8 18:6,9 19:8 20:2,24 21:4 22:8,22 23:15,23 27:3 28:17,20 29:7 29:11,18,24 30:2,5,12 32:10 33:5,18 36:25 37:5,7 40:19,24 41:15 44:9 46:7 46:11,22 47:4,7 47:8,9,11,23,24 47:25 48:19 49:13,14 50:10 51:10,22 52:3,4 52:10,12,20 53:18,21,25 54:25 55:10 56:20,22,25 57:2,7,12,18 58:3,9,15,18	61:12,17 62:3 62:16,23 63:4,9 64:1,13,18,22 65:4,11 66:22 68:15,16,19,22 69:10,15,18 70:2,3,23 71:7 72:20,21 73:2,4 73:20,21,23 74:3,4,14,23,24 75:12,13 77:5 78:6,10 79:14 79:14,17,17,25 80:1 81:17,19 81:23 82:11,25 83:11,17,20 84:6,7,9,20 85:22 86:8 87:9 87:10,20,24 88:7 90:20 93:4 94:2 Norwegian's 6:1 6:2 11:24 45:13 46:2,17 47:16 47:21 49:17 Norwegian 64:2 Notary 91:14,23 noted 24:6 notes 16:21 54:13 92:10 notice 4:6 10:18 10:25 11:16,25 81:8 noticed 49:7 50:8 66:1 notices 54:18 November 1:17 5:5 16:7 73:16 73:16,17,18 79:6 80:18,21 90:8 91:17,18 92:18 93:1 94:3 Number 41:11 41:13 numbers 20:15 71:23 numerous 26:7
M				
M 1:14 3:4 4:2 6:9,24 91:15 92:7 93:2,21 94:3,23 ma'am 15:16 Machado 21:8 21:13 Maestra 24:12 25:20 majority 59:24 making 59:19 62:3,6 Mambisa 84:20 84:22,23,24 85:1,9,14,16,21 manage 67:2,5 manages 53:4,6 66:25 mandate 41:11 41:19 manner 48:11 March 65:8,11 79:6 Marginal 25:2,4 Margol 2:10,10 2:10 5:18 María 39:11 Mariel 39:7 marina 80:17 Mario 16:6 61:14				
		N		
		name 6:4,22,22 6:23,24 8:16 13:8 18:1 25:23 43:18 62:11,12 83:8 86:14 named 8:6 84:22 86:9,11 names 43:19 44:1 45:8 55:25 nation 63:14 nature 8:3 NCL 7:7 18:12 41:6 59:18 76:5 83:4 90:9 NCLH 72:23 NCRA-Certified 1:23 91:22 92:22 93:16 near 61:6 necessary 45:7 45:15 46:4,25		

26:14	OFAC 48:23	operate 51:12,17	Parodi 16:6	18:8 40:16
O	offended 9:19	51:21 52:6,14	61:14 62:7	personally 8:6
oath 4:14 6:10	office 5:18 45:24	operated 29:6,10	88:11	17:17 32:22
9:6 11:23 12:6	48:7,13 49:24	55:24	Parodi's 24:19	41:14 58:11
33:3 91:6	50:3 93:7	operating 65:5	71:14,22	60:20 91:15
Obama 45:17	officers 43:17	operations 28:22	part 45:11,17	personnel 86:20
46:20 48:15	offices 57:9	43:12 57:11	57:17	86:21,21
49:1,25	officials 42:23	63:21 64:12,19	particular 57:11	persons 53:21
object 13:4 58:1	43:8,14,21,25	65:1 75:6 76:18	57:15 58:4,16	54:16 57:24
objecting 13:9	44:6,8 78:1	78:13,17,25	61:19 83:10	58:3,8 87:24
14:10	offshore 42:15,22	85:7	84:16	physically 76:16
objection 13:16	oh 25:25 68:2,2	opinion 46:18	parties 92:13	78:24
13:25 14:2,4,18	okay 7:8,10,15	opportunity	93:12	picking 71:17,19
15:10,11,24	8:2,11 9:2,15	19:21,22	parties' 92:14	picture 25:3,8,9
18:14 27:11,18	9:23,24 10:17	order 33:22 51:7	partners 8:20	25:13,18 26:2
28:6 31:19 32:1	10:24 11:5,12	69:20	party 93:11	piers 25:5
32:13 33:7 34:8	11:14,19 12:17	ordering 93:11	passenger 28:3	plaintiff 1:6 2:2,9
34:19 35:9,17	17:2,3 20:14	93:12	28:10 32:20	4:6,7,8,10 7:16
35:22 36:4,9,16	21:25 22:6 23:4	original 10:25	33:5 41:7	8:7,14 9:25
37:20 38:9,14	24:16 25:1,25	11:17 83:3	passengers 31:17	19:17 23:7 66:7
38:20,25 39:4,8	30:8 33:2 35:14	93:11	31:25 32:4,10	Plaintiff's 10:4,7
39:13,20 40:7	35:20 37:12	outside 27:7	32:23 33:19,22	11:7 24:7,17,23
41:2,10,20 42:5	40:14,18,25	owned 17:16	34:5 37:11	25:16 66:12
42:10,18 43:2	41:18 42:22	P	39:18 40:1,21	68:11 70:9,21
46:6 47:2 50:14	43:5,18,23 46:1	P.A 2:10 3:8	41:21 63:14	71:3
50:18 52:7,16	46:22 50:12	p.m 1:17 89:10	83:19	plaintiffs 8:18
53:8 54:19 56:3	52:3 53:6 54:12	89:11,11,13	passing 9:3	plan 88:25
58:2,12 61:20	57:16,23 59:6	90:15,16,16,18	penalties 94:21	planning 61:13
62:19,25 64:10	59:11 61:12	90:25 91:3	Penthouse 2:6	please 5:10 6:22
64:25 69:22	64:5,20 65:7	P47 23:5	people 14:9	9:18,21 10:25
70:25 71:15	66:10,16,20	P9 19:12	27:16,25 45:20	17:1 19:13
74:6,16 75:2,15	67:2,19 68:4,21	page 4:2,5,13	87:19	22:14 24:17
76:7,23 79:20	69:3,25 70:18	11:6,9,10 12:14	perfectly 89:8	60:15 63:7
80:4 82:19	70:20 71:9,16	20:4,14,15	perform 29:14	67:25 79:8
83:23 85:11	73:1,14 74:12	21:16 22:1 67:8	42:24,25	87:22 93:6
87:2 88:10	75:8,19 76:21	67:10,22 68:5	performing 27:3	PO 93:18
objections 18:20	77:9 80:7 81:5	68:10,10 71:5	period 80:14,24	point 16:24 86:2
obtain 51:11,16	81:16 85:1 90:4	71:17,19,23	perjury 94:21	points 68:15
51:20 52:5,13	90:6,11,14,24	72:2,4,5,10,12	permitted 32:10	policies 46:21
69:20	Old 34:12 60:4,6	90:3 94:5	45:22	policy 45:18
obtaining 51:2	60:8,18,21,22	pages 1:15 92:7	person 13:23	port 24:11,12,24
obviously 88:22	60:25 61:1,9	paginated 72:2	27:24 32:6	26:4,16,23
occur 8:21	onboard 42:16	Palm 3:10	43:24 44:8	28:14,23 29:4,9
Oceania 73:6	86:22	Panama 34:24	61:15 62:5 66:2	29:23 30:3,6,14
October 79:16	once 47:22 93:11	papers 18:24	82:12 83:9	30:23 32:11
80:10,25	OnCuba 17:23	paralegal 5:17	84:16,17,18	33:4,6,11,15
	open 31:24 32:2		personal 12:21	34:6 35:3,15,15

35:24,24 36:2	18:15 50:20	property 24:9	83:24 87:22	regard 58:4
36:11,11 37:2,2	58:1 65:14,16	26:3 35:2 45:7	88:4	regarding 84:14
37:14,22 39:7	65:18 68:9 74:5	48:2,21 49:10	questions 9:7	87:16
40:2 42:1,3,3,6	74:7 81:8 88:20	55:23 66:4	66:15 79:8	regardless 58:10
43:17 45:14	89:3	proposed 53:17		59:17
46:3,24 47:13	powerhouse	provide 17:7	R	Regatta 68:16
47:18 48:2	59:24	18:5 21:3 83:16	re-notice 10:7	69:3 80:20
49:19 53:5,7,13	prep 78:25	85:2	54:9,13	registered 34:24
53:13,14 59:9	preparation	provided 22:8	read 4:16 67:14	91:13 92:4
59:17 60:3,14	14:17 15:9,23	23:23 49:13	67:17,20 75:23	regular 28:9
61:6 62:17,24	16:10,14,17	54:8	90:23 93:7	regulations 45:20
63:5,10,20,22	55:3,13	providing 22:13	94:21	48:6,23 50:3
63:25 64:6,7,12	preparations	22:18 24:4 56:3	reading 72:14	63:19
64:13,17,17,21	55:15,20	86:23	91:1	related 49:5 85:3
64:21 66:25,25	prepare 12:18	provision 21:16	ready 37:10	relating 66:3
67:5 69:21 70:2	prepared 49:15	Public 91:14,23	56:10 59:4	relationship 8:19
72:16 74:3,15	57:19,24	pull 10:9 19:12	81:12,13	17:4
74:23,25 75:3,6	preparing 16:4	23:5 24:17	really 14:12	relative 92:12,13
75:10 76:4,5,17	present 3:13	25:15 70:9	reason 20:9	rely 46:23 47:11
76:18 78:1	43:20 44:7 55:4	89:16	71:12 75:19	remember 7:23
84:25 85:2,3,6	55:15,19 77:24	Punta 37:24,25	78:13 94:5	8:16 19:10
85:8,14,16,16	78:7	38:1,7,12,18	reasons 55:22	25:23 30:9
85:17,18	president 77:12	purchasing 32:23	59:7,16,18 63:4	43:19 44:1
portion 14:6,7	President/CEO	purports 73:3	63:9	53:20 62:11
ports 35:1,7,20	20:21,24	purpose 82:16	recall 20:13 54:2	70:4 78:11 82:7
36:7,14,20	pretty 87:14	purposes 56:25	receipt 93:9	83:8 84:10
37:10,12 40:23	preventing 27:25	pursuant 21:4	received 20:8	remind 66:23
40:24 41:14	principals 56:21	22:21	recognize 66:18	reminded 38:2
53:6,9,12 64:3	58:15,18 84:18	put 10:24	recollection 8:22	REMOTE 2:1
67:2 68:22 75:5	print 70:17		20:5 22:18	remotely 1:19 5:7
76:12,13,16,21	prior 20:6,8,11	Q	record 5:2 6:21	rep 13:23
77:4,7,22 78:8	26:1 41:14	qualified 86:21	13:17 14:5 15:4	repeat 18:1 22:14
78:14,16,20,25	56:14 74:1	86:24	44:23 45:1	36:18 53:1 63:7
85:14 87:18	private 78:3	question 9:9,17	65:20,23 88:21	67:25 74:17
Portuguese 67:20	privilege 14:25	9:22 13:6,18	89:10,13 90:15	75:21 79:21
position 37:1	15:11,16,25	18:22 22:14	90:18,25 92:9	86:14 87:22
57:14 74:20	privileges 15:17	29:2 32:9,15	redirect 90:21	88:3
positions 45:9	probably 8:2	35:6 36:18,23	refer 16:25 24:10	rephrase 21:7
55:25 61:23	37:17	37:6,7 40:12	54:4	44:6
posted 48:7	process 18:19	41:1,3,25 42:12	referring 7:6	reply 83:5
49:23 50:3	produced 71:7	42:20 45:12	17:2 20:15	report 92:6
Postman 3:9 6:4	72:20 73:1	47:3,20 49:21	24:14 50:6	reporter 1:23
6:5 10:10,13	product 14:25	53:1 58:7,8	51:22 57:7	4:15 5:8,11
11:9,12 12:23	15:17,25	63:7 67:25	refers 21:21,22	9:10,14 13:10
13:4,11,12,17	products 32:22	74:17 75:22,23	reflect 23:21	91:14,22 92:1,5
14:19,21,24	Professional	76:24 78:4,5	reflects 10:20	92:22 93:16
15:12,15 16:1	91:14 92:5	79:24 82:20	refrain 24:9	represent 10:17

11:15 57:10 71:6,11 representative 1:14 12:4 47:9 49:14 50:10 57:1 represented 8:10 representing 13:20 represents 82:4 requested 92:8 requesting 83:5 requests 52:20 53:16 required 51:20 52:13 requirements 52:2 requires 42:8 research 40:15 40:18,25 41:5 reside 63:16 respect 22:22 87:16 respond 83:5 responsible 61:12 82:24 86:23 responsive 50:17 restate 9:19 retain 18:12 review 16:5,9 92:8 93:6,7,9 reviewed 58:25 84:12 93:12 revisions 23:19 23:21 rich 61:3 Richard 2:15 5:21 13:15 44:12 93:2 richard.lorenz... 2:16 93:3 richness 61:1 right 10:3 12:2,9 12:11 16:24 20:18 21:19	23:12,17 31:2 31:10,24 33:22 34:1 41:25 44:11 54:2 55:7 58:23 60:4,6 61:7 64:3 65:13 65:25 81:11,20 82:1 86:25 87:8 88:15 right-hand 71:24 rights 13:24 Rio 19:3 58:19 Rio's 20:23 ROBERTO 2:4 Rodney 2:10 5:18 rodney@marg... 2:11 room 13:11 rows 73:6 RPR 1:22 91:22 92:21 93:16 Rule 14:7 rules 9:3 <hr/> S S 2:10 3:2 S-E-R-I-C-M-... 86:16 S.A 52:21,25 53:3 66:22 81:18,20 82:6 sailing 73:15 sailings 33:3 Santiago 35:25 36:3,12 37:19 37:22 39:25 40:3 53:14 67:6 69:1,8 70:24 73:13,17 79:4 79:18 80:3 85:17 90:8 saw 33:4 saying 48:19 58:3 63:24 75:19 88:22 says 21:17 37:8	42:13 49:8 68:6 72:15,21,23 73:9 scasey@colson... 2:6 Schedule 21:22 21:23 22:1,12 22:16 scope 21:17 23:19 Scott 3:8 6:6 scratch 19:6 27:1 51:15 52:11 screen 56:5 81:7 screening 35:4,8 36:15,21,22,24 37:4,8,13,21 38:19 Seas 80:23 season 68:7 second 30:24 31:9,12 Section 54:10 security 27:24 31:7 see 11:19 18:19 21:17,23 22:2,4 22:25 26:21 44:13,14 48:8 50:20,21 53:17 60:19,20,21 66:5 68:5,8,17 68:24 69:1,8,11 72:24 73:5,6 seen 10:13,21 11:14,17 32:22 33:18 37:14,16 37:17,22 sees 50:22 select 62:17 selected 11:23 47:9 49:14 57:2 sense 13:9 89:1,2 89:6 sent 10:11 11:3 sequentially 10:5 Serena 68:16	69:6 Sericmar 86:12 87:5 services 18:5 19:8 21:3 22:7 22:11,15 23:22 24:1 28:17 29:14 43:1 45:23 49:5 83:16 85:1,3 86:23 Servicio 4:10 set 73:6 seven 78:14 80:23 shake 9:12 SHEET 4:17 94:1 shifting 44:14 ship 26:23 28:10 28:24 29:4,6,10 30:10,13,13,21 32:21 39:17 40:20 41:7 42:15,17,22,25 43:1 63:23 64:8 85:7 86:22 ships 30:6 32:24 37:25 38:5 55:24 62:18 68:6,19 85:4 90:9 shop 32:8,10 shore 17:7 34:11 42:24 Shores 93:18 short 44:16 88:16 show 10:3 50:21 Sierra 24:11 25:19 sign 4:16 93:7,7 signage 29:24 signature 20:19 20:23 93:19 signed 68:1 75:4 91:18 signing 67:23	75:11 77:19 91:1 simply 79:18 Sincerely 93:13 single 42:2,3,6 sir 6:18,21,25 7:12 8:6,12 9:17 10:3,8,17 11:6,19,22 12:18 14:15,21 15:6,19 16:4,20 17:4,9 19:20,25 20:18 21:2,12 21:15,17,25 22:6,20 23:10 23:13 24:6,18 25:1,17 29:13 31:3 32:9 34:25 35:14 36:2,25 39:23 42:9 45:3 45:12 46:1,10 47:6,22 48:18 49:7,16 50:8,9 50:24 51:2,25 52:19 53:21 54:2,14 55:22 56:10,24 57:16 58:8,25 59:4 60:3 63:3 64:3 64:20 65:25 66:13,17 67:8 67:10 68:4,14 69:14,25 70:12 70:20 71:6 72:9 73:12,19 74:12 74:20,22 75:12 77:3 81:16 89:15 90:2,7 site 57:8 61:9 sitting 64:7 six 68:25 78:14 Sky 68:15,22 73:21 75:13 79:17,25 small 70:17 71:5 87:13 smaller 73:20
---	--	--	---	---

sorry 14:8 18:18 18:23 19:5 26:13 32:14 42:25 51:14 53:1 55:17 68:9 75:20 79:13 84:2 86:13 89:18 sort 9:3 sought-after 60:23 source 40:6,13,13 40:14,15,16 41:19 43:5 SOUTHERN 1:1 souvenir 31:16 souvenirs 31:18 Spanish 61:3 67:12,14,16 speak 12:3 16:16 34:20 48:11 56:19,24 57:3,6 57:14,19 speaking 46:11 specializes 82:3 specific 48:9 50:4 speculate 48:6 58:14 61:23 Speedway 8:5 spell 6:22 spend 13:2 14:16 15:22 spent 13:6 15:8 spoke 43:15 SS 91:9 staff 37:10 stairs 34:4 stands 82:5,7 start 34:25 45:4 45:11 59:15 60:19 74:21 78:13 started 60:12 63:20 64:12,19 70:3 77:15,19 81:18 starting 90:8	state 18:20 91:8 91:14,23 state-owned 31:21 stated 74:11 76:15 77:20 94:22 statement 9:23 statements 76:10 States 1:1 48:13 statute 48:9 Steinbeisser 1:22 5:8 91:13,22 92:4,21 93:16 Steinotype 93:17 stenographer 14:8 18:23 75:23 89:20 stenographic 1:23 91:22 92:10,22 93:16 stenographically 1:22 92:6 Steph 11:1 19:14 Stephanie 2:5 5:14 12:13 71:10 88:17,20 89:25 stop 39:19,24 40:22 41:9 53:18 59:7,16 59:19 61:17,18 62:24 63:5,10 69:18,20 74:15 76:5 stopped 33:4 37:3 64:2 65:12 79:15 stops 39:17,17 40:20 41:7 68:6 68:22,23,24 69:3,7,7,8,11 70:23 73:12 store 32:22 33:5 stores 31:12,15 31:16,20,21,22 32:8,11,23	street 2:11 3:5 25:9,12,14,21 25:24 26:22,24 28:4 32:6 streets 60:25 subject 24:8 35:2 45:7 48:1,21 49:10 55:23 56:23 57:15 58:4,16 66:3 Subsection 21:20 21:20,20,21,22 subsidiaries 17:17,21 substance 15:7 15:20 suggested 93:9 suggestions 84:12 Suite 2:18 3:10 Sun 68:16 69:10 73:21 75:13 79:17 80:1 support 45:5,13 46:2,17,23 47:11,16,25 48:20 49:9,17 sure 9:4 24:16,21 37:17 44:18 60:16 63:8 65:14,17 71:17 74:19 87:23 88:6 swear 5:11 6:10 sworn 91:16	60:12 tell 10:21 15:7 24:20,22 25:13 26:1 45:12 52:24 53:2 59:6 63:3 77:14 82:1 89:5 telling 15:6 57:23 ten 26:8 44:19 65:16 term 24:8 terminal 24:11 24:12 25:19 26:4,16,21,23 27:5,6,9,14,17 27:17,21,22,25 28:11,12,14,24 29:4,10,23 30:3 30:6,14,17,19 30:23 32:6,12 33:4,6,12,16,23 34:6 35:3,12,12 35:15,15 37:2,2 45:14 46:3,25 47:13,18 48:2 49:19 53:7 59:17 60:3,14 61:7 62:17,24 63:5,11 64:6,7 64:21 terms 13:6 84:13 testified 24:20 32:5 69:25 testify 11:23 12:6 47:23 49:15 76:13 testifying 9:6 47:7 57:17 77:3 testimony 6:11 16:5,22 33:2 35:14 39:23 40:4 55:3,13 64:6,20 65:10 70:4,7 74:1,13 74:22 75:3 76:4 77:6 79:12,13 thank 6:3 19:16	44:20 56:8 65:18 81:4,13 89:25 90:19,21 Thanks 14:4 72:7 Thereupon-- 6:8 thing 24:22 31:2 think 5:19 9:21 10:4 12:13 14:25 23:20 56:17 60:12 64:11 67:11 76:9,24 78:12 84:2 87:13 88:13 90:12 thinking 57:5 thought 12:16 13:19 25:25 three 16:12 25:4 40:20 41:7 69:3 69:7,8 ties 82:18 time 5:6 7:5,5 9:2 13:2,6 14:15 15:8,22 16:24 26:15 28:13,21 35:11 44:16,23 45:1 63:20 64:1 64:12,19 65:20 65:23 75:4 76:14,17,18,22 77:5,8,13,23 78:8,20 80:9,15 80:25 89:13 90:15,18 times 24:9 26:6,7 26:14,14 43:10 49:22 60:2 title 72:10,11 today 5:5,15,16 5:24 6:7 9:6 11:23 12:3,7,19 16:10,21,22 24:8,10 33:2 35:2,14 46:11 47:7 49:8 55:3 55:13 57:17,20 65:10 67:17
--	---	---	---	--

<p>today's 10:20 told 77:7,9 Tony 3:12 5:9 top 20:16 25:3 68:5 72:9,10,12 72:13,15,19 topic 34:25 44:11 45:4,4 49:7,13 50:8,17 53:23 54:18 55:21,22 56:15,18 58:10 58:25 65:25 66:1 81:2 88:1 88:9 topics 11:24 12:7 12:9,9 24:7 54:17 57:19 87:21 tour 34:12 tourist 60:7,9,11 60:13,15 transaction 45:14 transactions 45:6 46:3,24 47:12 47:17 48:1,21 49:10,18 83:10 transcript 92:8,9 93:5,8,9,11,12 94:1 transportation 49:3 Transportes 52:21,25 53:3 travel 17:23 34:23 45:8,16 45:17,18,23,24 46:5,18 47:1,14 47:19 48:3,12 48:22 49:5,11 49:20,23 50:1 63:18 83:15 traveled 78:10 traveling 48:16 travels 50:2 trick 49:12 true 29:20 92:9</p>	<p>94:22 truth 6:12,12,13 try 9:11,22 24:9 28:3 67:21 70:12 trying 32:7 49:12 49:16 57:15 70:15 Tuesday 12:24 15:8 turn 44:11 55:21 56:13 58:23 80:7 Turning 81:2 two 14:9 33:1,3 34:3 55:4 76:13 Type 72:16</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 9:12 understand 7:10 9:16,18 11:22 12:2 25:25 36:23 41:3 42:20 46:13 48:18 57:16,21 70:16 73:19 89:23 understanding 76:9 77:2 Unintelligible 89:19 United 1:1 48:13 use 23:2 48:20 59:12 64:14,18 64:23 87:18 uses 45:7,14 46:3 46:24 47:12,17 48:1,21 49:10 49:18 utilized 40:24</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>V(H) 12:10,16 V(I) 12:14,17 66:1 81:3 V2 66:11 venues 59:25</p>	<p>60:1 63:16 versa 83:4 versus 5:4 vessel 73:20 vessels 75:13 79:17 80:1 vice 83:4 vice-president 21:8 Vidal 3:4 6:2 54:20,23 55:2 56:14 57:5,25 82:13,15 84:8 84:17 85:24 86:2 Vidal's 83:5 video 5:2 VIDEO-REC... 1:13 Videoconference 1:19 videographer 3:12 5:1,9 44:22,25 65:19 65:22 89:9,12 90:14,17,24 view 25:9 visit 76:15 visited 28:13,16 28:23 29:22 40:23 41:14 visiting 33:5 voices 14:13,13 89:23 Voyager 80:23 VS 93:4 94:2 vs- 1:7</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>W 1:22 91:13,22 92:4,21 93:16 wait 9:8 waive 93:7,19 waived 91:2 walk 27:17 28:4 28:11 30:11 32:6 34:12</p>	<p>walking 27:25 34:11 want 13:18 15:3 50:20,21 70:6 71:16 74:1 81:6 86:20,21 87:15 88:23 wanted 26:20,21 wants 69:19,19 wasn't 29:1 water 25:6,10 way 73:5 ways 34:3 we'll 67:21 89:5 90:12,23 we're 5:25 13:10 24:21,22 76:16 81:13 89:9 90:14 we've 35:2 44:13 89:24 website 50:3 went 26:15,24 weren't 52:21 West 3:10 whichever 49:1 wholly 17:16 witness 1:22 3:7 4:2,16 5:12 6:14 13:5,20 15:13 90:21 94:3 word 23:2 76:8 words 24:13 37:5 work 14:24 15:16 15:25 21:17 23:19 27:3,21 28:12 67:21 86:22 89:7 worked 21:9 58:11 62:10 world 60:24 worries 89:24 wrapping 87:14 WRITE 94:1 written 20:11 72:2</p>	<hr/> <p style="text-align: center;">X</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>yeah 11:10 22:5 22:5 25:23 50:19 62:14 81:6 89:7 year 43:11 72:16 years 8:17,23,24 43:12 61:2 yesterday 10:11 10:14 11:3 12:25 15:19,21</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>Zoom 1:19 5:7,16</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 1:15 11:11,20 21:16,22 22:1 22:12,16 24:6 41:11 92:7 1:03 90:16,18,25 91:3 10 71:5 72:2,5,6 72:10 90:3 10:28 44:23,24 10:40 44:24 45:1 11:12 65:20,21 11:25 65:21 11:27 65:23 12 1:17 5:5 45:23 50:2 63:18 91:17 94:3 12:02 89:10,11 12:11 89:11,13 12:13 1:17 90:15 90:16 120 3:10 13 20:14 14 22:1 70:10 71:4 89:16,18 90:2 15 8:23,24 15th 73:16 16 8:23,24 68:24</p>
--	--	--	---	---

<p>18 73:17 19 4:7 73:18 19-23591-CIV-... 1:2 93:4 94:2 19th 3:5</p> <hr/> <p style="text-align: center;">2</p> <p>2 21:23 22:12,16 23:19 28:15 41:13 67:8 68:5 68:10,10 20 26:10 77:18 2015 35:6 2016 19:11 26:17 26:19 29:20 77:18 2017 20:11 65:6 65:8,11 68:3,7 70:22 73:17,17 73:18 79:6,6,16 79:16 80:9,10 80:18,18,21,21 80:25,25 90:8 2018 28:15,16 68:7 2019 29:20 35:7 2020 1:17 5:5 16:7 91:17,18 92:18 93:1 94:3 2021 91:24 2029 2:11 20th 73:18 222 3:10 23 4:8 24 93:1 24th 91:18 92:18 255 2:6 27 20:11 2700 2:18 27th 68:2</p> <hr/> <p style="text-align: center;">3</p> <p>3 23:20 30 93:9 30(b)(6) 14:7 54:9 88:23 89:4 305-436-4690 3:6 305-459-6652</p>	<p>2:19 305-476-7400 2:7 305)632-4464 93:7 31 68:22,23 32250-7429 2:12 33126-1201 3:5 33131-3085 2:18 33134 2:7 33153-1108 93:18 33401-6146 3:10 38 9:25 10:4 11:7 24:7 38Depo 4:6 39 19:15,17 39Master 4:7 3rd 2:11</p> <hr/> <p style="text-align: center;">4</p> <p>4 11:6,9,10 23:20 25:16 91:24 40 23:6,7 26:12 40First 4:8 41 66:7,12 68:11 70:21 41Contrato 4:10</p> <hr/> <p style="text-align: center;">5</p> <p>5 16:7 23:20 531108 93:18 561-383-9234 3:11</p> <hr/> <p style="text-align: center;">6</p> <p>6 4:3 23:20 24:17 24:23 90:12 600 2:18 66 4:10</p> <hr/> <p style="text-align: center;">7</p> <p>7 23:20 7665 3:5</p> <hr/> <p style="text-align: center;">8</p> <p>8 12:14 23:20</p> <hr/> <p style="text-align: center;">9</p>	<p>9 4:6 67:10,22 72:4 9:30 5:6 9:31 1:17 904-355-7508 2:12 91 4:14 92 4:15 93 4:16 94 1:15 4:17 92:7</p>		
---	--	--	--	--

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
IN RE: HAVANA DOCKS VS. NORWEGIAN CRUISE
CASE NO. 19-23591-CIV-BLOOM/LOUIS
WITNESS: HUGO M. CANCIO
TAKEN: NOVEMBER 12, 2020

PAGE LINE CHANGE REASON FOR CHANGE

See attached list of errata corrections.

Under penalties of perjury, I declare that I
have read the foregoing document and that the facts
stated in it are true.

12/23/2020 
Date HUGO M. CANCIO

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
IN RE: HAVANA DOCKS VS. NORWEGIAN CRUISE
CASE NO. 19-23591-CIV-BLOOM/LOUIS
WITNESS: HUGO M. CANCIO
TAKEN: NOVEMBER 12, 2020

PAGE LINE CHANGE REASON FOR CHANGE

See attached list of errata corrections.

Under penalties of perjury, I declare that I
have read the foregoing document and that the facts
stated in it are true.

12/24/2020



Date

HUGO M. CANCIO

Errata Sheet corresponding to deposition taken on November 12, 2020 of Mr. Hugo Cancio as a corporate representative

Page	Line	Change	Reason for Change
6	2	"deputy general counsel" should read "assistant general counsel"	Corrective
38	6	"Yes" should be "no"	Corrective
69	17	"I believe so" should read "No, I believe Norwegian first contracted with Aries in December 2016."	Corrective

Errata Sheet corresponding to deposition taken on November 12, 2020 of Mr. Hugo Cancio in his individual capacity:

Page	Line	Change	Reason for Change
14	20	"concession agreement" should read "consulting agreement"	Corrective
33	11	"Howard Stuart" should read "Howard Sherman"	Corrective
52	20	"Consternation" should read "conciliation"	Corrective
55	6-7	"Norwegian Cruise Line's focus" should read "Norwegian Cruise Line- focused"	Corrective
78	2-3	"I define crew as the Cuban people who live on the island" should read "health services are free for the Cuban people who live on the island"	Corrective
127	10	"this operations" should read "these operations"	Corrective
127	11	"would violate" should read "would not violate"	Corrective