

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 06-22128-CV-KING/MCALILEY

ALBERTO JUSTO RODRIGUEZ LICEA,
FERNANDO ALONSO HERNANDEZ, AND
LUIS ALBERTO CASANOVA TOLEDO,

Plaintiffs/Judgment Creditors,

vs.

CURACAO DRYDOCK COMPANY, INC., A/K/A
CURACAOSE DOKMAATSCHAPPIJ NV, A/K/A
CDMNV,

Defendant/Judgment Debtor.

ANSWER OF GARNISHEE

COMES NOW, Garnishee, Church of Scientology International¹, (“CSI”), by and through undersigned counsel, and hereby files its Answer to Writ of Garnishment [DE 381], served by Plaintiffs/Judgment Creditors, Alberto Justo Rodriguez Licea, Fernando Alonso Hernandez, and Luis Alberto Casanova Toledo (“Judgment Creditors”), and states:

1. At the time of service of the Writ of Garnishment and at all times subsequent to such service, up to and including the time of filing this Answer, Garnishee, CSI, was not and is not indebted to Defendant/Judgment Debtor, Curacao Drydock Company, Inc., a/k/a Curacaose Dokmaatschappij NV, a/k/a CDMNV.

¹ The Writ of Garnishment [DE 381] was issued to an entity identified as “The Church of Scientology International, Inc.” with a purported address at 120 Giralda Ave, Coral Gables, Florida 33134. No such entity exists. Information available at the Florida Secretary of State’s website (sunbiz.org) confirms an entity with this name has not been active in Florida since 1985. The entity answering this Writ is “Church of Scientology International” which has an address in Los Angeles, California. The Church of Scientology International files this Answer in an abundance of caution even though it has not been properly served.

2. At the time of service of the Writ of Garnishment and at all times subsequent to such service, up to and including the time of filing this Answer, Garnishee, CSI, does not have in its possession or control any property, tangible or intangible, payable to or otherwise for the benefit of Defendant/Judgment Debtor, Curacao Drydock Company, Inc., a/k/a Curacaose Dokmaatschappij NV, a/k/a CDMNV, nor does it have any reason to expect that it will come into possession or control of any such property.

3. Garnishee, CSI, knows of no other person or entity indebted to Defendant/Judgment Debtor, Curacao Drydock Company, Inc., a/k/a Curacaose Dokmaatschappij NV, a/k/a CDMNV, or any other person or entity who may have in its possession or control any property, tangible or intangible, payable to or otherwise for the benefit of Defendant/Judgment Debtor.

4. Having fully answered the Writ of Garnishment [DE 381] served upon Garnishee, CSI requests that it be allowed reasonable attorney's fees and costs as provided by applicable law resulting from its participation in this law suit and demands payment of any amounts deposited with the Court for the payment or part payment of Garnishee's attorney's fees expended to respond to the writ.

WHEREFORE Garnishee, Church of Scientology International, Inc., requests that this Honorable Court enter an Order vacating Plaintiffs/Judgment Creditors, Alberto Justo Rodriguez Licea, Fernando Alonso Hernandez, and Luis Alberto Casanova Toledo's Writ of Garnishment [DE 381], awarding attorney's fees and costs as referenced above to Church of Scientology International, Inc., and for all other relief this Court deems just and proper.

Dated: November 12, 2013

Respectfully Submitted,

MOORE & COMPANY, P.A.
Counsel for Garnishee

355 Alhambra Circle, Suite 1100
Coral Gables, FL 33134
Telephone: (786) 221-0600
Facsimile: (786) 221-0601
Email: cnaughton@moore-and-co.com
Email: michael@moore-and-co.com

s/ Clay M. Naughton

Clay M. Naughton
FL Bar No. 029302
Michael T. Moore
FL Bar No. 207845

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 12, 2013, this document was electronically filed with the Clerk of the Court using CM/ECF and is thereby being served this day on all counsel of record identified on the following service list:

John Thornton, Esq.
Do Campo & Thornton, P.A.
Miami Tower
100 Southeast Second Street, Suite 2700
Miami, FL 33131
Telephone: (305) 358-6600
Facsimile: (305) 358-6601
Email: jt@dandtlaw.com
Attorneys for Plaintiffs/Judgment Creditors

s/ Clay M. Naughton

Clay M. Naughton