

UNITED STATES DISTRICT COURT
FOR THE 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.

CURAÇAO DRYDOCK COMPANY, INC., A/K/A
CURAÇAOSE DOKMAATSCHAPPIJ NV, A/K/A
CDMNV,

Defendant/Judgment Debtor.

**JUDGMENT CREDITORS' REPLY TO CHURCH OF SCIENTOLOGY
INTERNATIONAL'S ANSWER TO WRIT OF GARNISHMENT**

Judgment Creditors reply to Garnishee Church of Scientology International's Answer to Writ of Garnishment Served November 12, 2013.

Plaintiffs-Judgment Creditors controvert the answer of the garnishee, Church of Scientology International ("Garnishee") filed in response to the Writ of Garnishment. Judgment Creditors have good reason to believe and do believe that the answer (the "Answer") of the Garnishee is incorrect in the following particulars:

1. Contrary to Garnishee's Answer, Garnishee was indebted to Petitioner/Judgment Debtor, Curacao Drydock Company, a/k/a Curacaose Dokmaatshcappij NV, a/k/a CDMNV (the "Drydock") as of the time of Garnishee's Answer on November 12, 2013 or at times since issuance on October 22, 2013 and service of the Writ, or at times between such times and did have or still has monies of the Drydock in its custody, possession or control, and have or may

have had other tangible or intangible personal property of the Drydock in its possession or control at the time of the Answer or at times since the service of the Writ. At the time of Garnishee's Answer, Garnishee was aware of persons or entities indebted to the Drydock, who had or may still have property of the Drydock in its custody, possession or control.

2. Specifically, Garnishee and/or its alter ego is owner or the manager of the M/V Freewinds, a vessel that, at the time of the service of the Writ, was undergoing repairs by the Drydock at their facility in Curacao. Garnishee, in its Answer, does not acknowledge any connection to the M/V Freewinds, and instead, baldly denies any knowledge of any person or entity indebted to the Drydock. *See* Answer at ¶3.

WHEREFORE, Judgment Creditors request that the issues raised by this Reply and the Answer of Garnishee be tried, as provided by law, and demand judgment against Garnishee, International Shipping Partners, Inc., in accordance with the findings of the Court against the Judgment Debtors and against Garnishee in order that Judgment Creditors' Final Judgments in the amount of \$80,000,000, plus interest and costs may be collected and for such other and further orders and relief as the Court may deem just and proper; and further request that the Court allow Judgment Creditors a reasonable opportunity to conduct discovery in aid of judgment and execution pursuant to Fed. R. Civ. P. 69(a) into the factual disputes raised in the Answer and this Reply.

Respectfully submitted,

Dated: Miami, Florida
December 5, 2013

GROSSMAN ROTH, P.A.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of December, 2013, the undersigned electronically executed the foregoing document with the Clerk of Court via the CM/ECF system, and that a true and correct copy is being served this day via Notices of Electronic Filing generated by CM/ECF, on counsel for all parties.

Dated: Miami, Florida
December 5, 2013

GROSSMAN ROTH, P.A.

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