

**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.

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**ANSWER OF GARNISHEE**

COMES NOW, Garnishee, Church of Scientology of Florida, Inc., (“CSF”), by and through undersigned counsel, and hereby files its Answer to Writ of Garnishment [DE 379], 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, CSF, was not and is not indebted to Defendant/Judgment Debtor, Curacao Drydock Company, Inc., a/k/a Curacaose Dokmaatschappij NV, a/k/a CDMNV.

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, CSF, 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, CSF, 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 379] served upon Garnishee, CSF 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 of Florida, 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 379], awarding attorney's fees and costs as referenced above to Church of Scientology of Florida, Inc., and for all other relief this Court deems just and proper.

Dated: November 12, 2013

Respectfully Submitted,

**MOORE & COMPANY, P.A.**  
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**s/ Clay M. Naughton**

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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:

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*Attorneys for Plaintiffs/Judgment Creditors*

**s/ Clay M. Naughton**

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Clay M. Naughton