

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.

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**JOINT NOTICE OF WITHDRAWAL AND DISMISSAL OF WRITS OF  
GARNISHMENT**

Plaintiffs/Judgment Creditors, Alberto Justo Rodriguez Licea, Fernando Alonso Hernandez, and Luis Alberto Casanova Toledo (collectively “Plaintiffs” or “Judgment Creditors”), and Garnishees Dole Food Company, Inc. (“Dole”), Reefership Marine Services Ltd. (“Reefership”), and Ventura Trading Limited (“Ventura”) (collectively “Garnishees”) hereby file this Joint Notice of Withdrawal and Dismissal of Writs of Garnishment and state as follows:

1. Plaintiffs served writs of garnishment (the “Writs”) on Garnishees. *See* DE 383 (writ directed to Dole); DE 366 (writ directed to Reefership); DE 557 (writ directed to Reefership); and DE 568 (writ directed to Ventura).

2. Plaintiffs and Garnishees have agreed that the Writs should be dissolved, with prejudice, with Garnishees accepting the statutory garnishment deposit from the Court Registry in full satisfaction of any and all claims to attorneys’ fees and costs and Plaintiffs’ to pay their own attorneys’ fees.

3. Nothing herein shall constitute an admission by Garnishees of the validity of the Writs or by Plaintiffs of the validity of any defense to the Writs.

4. Upon dissolution of writs of garnishment DE 366, DE 383, DE 557 and DE 568 stay order DE 582 is no longer necessary and should be terminated.

Wherefore, Plaintiffs and Garnishees Dole Food Company, Inc., Reefership Marine Services Ltd., and Ventura Trading Limited hereby request an Order declaring the Writs (DE 366, DE 383, DE 557 and DE 568) dissolved with prejudice, directing the Clerk of Court to disburse the statutory garnishment deposits from the Court Registry corresponding to the Writs to each of the Garnishees as satisfaction of any claim to attorneys' fees and costs, and terminating stay order DE 582.

Dated: July 21, 2015

Respectfully submitted,

<p><b>By: /s/ John Thornton</b> JOHN THORNTON Florida Bar No. 004820 <a href="mailto:jt@dandtlaw.com">jt@dandtlaw.com</a> <i>Attorneys for Plaintiffs/Judgment Creditors</i> DO CAMPO &amp; THORNTON, P.A. Miami Tower, Suite 2700 100 Southeast Second Street Miami, FL 33131 Phone: 305-358-6600 Fax: 305-358-6601</p> <p>GROSSMAN ROTH, P.A. Seth Miles, Esq. Stuart Grossman, Esq. 2525 Ponce de Leon Blvd., 1150 Coral Gables, Florida 33134 (305) 442-8666</p> <p>REED SMITH LLP Jordan W. Siev, Esq. Casey D. Laffey, Esq. 599 Lexington Avenue New York, New York 10022 (212) 521-5400 <i>Attorneys for Plaintiffs/Judgment Creditors</i></p>	<p><b>/s/ Timothy P. Shusta</b> Timothy P. Shusta FBN: 442305 <a href="mailto:shustat@phelps.com">shustat@phelps.com</a> PHELPS DUNBAR, LLP 100 S. Ashley Drive, Suite 1900 Tampa, FL 33602-5319 Phone: 813-472-7550 Fax: 813-472-7570 Attorneys for Garnishee, Reefership Marine Services, Ltd., Garnishee Dole Food Company, Inc. and Garnishee Ventura Trading Limited</p>
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21st day of July 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. Notice of this filing will be sent by operation of the Court's CM/ECF system.

*/s/John Thornton*  
JOHN THORNTON