

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIGUEL ANGEL CORBACHO DAUDINOT

Plaintiff,

CASE NO. 13-CV-22589-KMW

v.

YASIEL PUIG VALDES a/k/a YASIEL PUIG
and MARITZA VALDES GONZALEZ.Defendants.

PLAINTIFF'S NOTICE OF PENDING, REFILED, RELATED OR SIMILAR ACTIONS

Plaintiff, pursuant to Local Rule 3.8, hereby files the follow Notice of Pending, Refiled, Related or Similar Actions:

Plaintiff notifies the Court that there are two (2) case raising similar issues that are pending in the United States District Court for the Southern District of Florida before the Honorable Cecilia Altonaga. The first case, captioned, *Curbelo Garcia et al v. Chapman et al*, Case No. 12-cv-21891, was filed on May 18, 2012; and the second case, captioned, *Curbelo Garcia et al v. Chapman Bennett et al*, Case No. 13-cv-22210, was filed on June 20, 2013.

The cases that are already before judge Altonaga concern the same issues of law and similar issues of fact, and are brought under the jurisdiction of the court pursuant to the Torture Victim Protection Act of 1991, 28 U.S.C. § 1350 ("TVPA").

In all of the cases the Plaintiffs were victims of arbitrary and prolonged detention and torture committed in Cuba as a result of the false accusations of the Defendants, who acted as informants for the government as part of a conspiracy to imprison and torture the Plaintiffs, and

Plaintiffs in all cases are seeking claims against Defendants for torture under the TVPA based on conspiracy and aiding and abetting.

The Defendants are Cuban baseball players (Chapman and Puig) and their families (Chapman Bennett, De La Cruz, and Valdes), who acted as informants for the government and accused Plaintiffs of Human Trafficking. The Defendants’ motivation was their own and their sons’ career advancement and a chance to flee Cuba in to play professionally.

Both Chapman and Puig, who had been under sanctions in Cuba at the time they made their accusations against Plaintiffs, profited from their actions. They were rewarded for accusing the Plaintiffs of Human Trafficking by being reinstated in their respective baseball teams and being included in the national team, which travels abroad. Shortly after testifying against Plaintiffs, Defendants did the very thing for which they accused the Plaintiffs: they escaped Cuba.

There is a shocking similarity and a startling pattern to both Chapman’s and Puig’s accusations:

PUIG was under sanctions when he made his accusations against the accused on the Cuban case.	Chapman was under sanctions when he made his accusations against the accused in the Cuban case.
PUIG accused two men, who he saw driving a tourism car, of offering to take him out of Cuba illegally.	Chapman accused two men, who he saw driving a tourism car, of offering to take him out of Cuba illegally. (each time, he accused 2 men)
One of the two men PUIG accused lived abroad, while the other was a Cuban citizen living in Cuba.	One of the two men Chapman accused lived abroad, while the other was a Cuban citizen living in Cuba (both times).
PUIG claimed that the men offered him millions of dollars to play baseball abroad	Chapman claimed that they men offered him millions of dollars to play baseball abroad.
PUIG claimed that the men told him that they	Chapman claimed that the men told him that

were also planning to take other players PUIG knew with them.	they were also planning to take other players Chapman knew with them.
PUIG claimed that they would take him to a safe house, then to a beach, from where they would leave the island by speedboat.	Chapman claimed that they would take him to a safe house, then to a beach from where they would leave the island by speedboat.
PUIG's mother made the initial accusations against the Plaintiff.	Chapman's father made the initial accusation against Mena Perdomo.
PUIG called the DCSE after being contacted by OROZCO and they arrested OROZCO while he was leaving Cienfuegos.	Chapman called the DCSE after meeting with Curbelo Garcia and Medina and the DCSE attempted to arrest them while leaving Frank Pais.
PUIG's was immediately reinstated into the team at Cienfuegos after he made his accusations	Chapman was immediately reinstated into the team at Holguin after he made his accusation.
PUIG's mother testified that Plaintiff offered to take PUIG out of Cuba illegally despite acknowledging that she was never privy to any conversation between PUIG and Plaintiff.	Chapman's parents testified that the Plaintiffs in the Chapman case offered to take Chapman out of Cuba illegally despite acknowledging that they were never privy to any conversation between Chapman and the Plaintiffs.
PUIG attempted to defect during the 2011 World Port Tournament in Rotterdam, Netherlands	Chapman defected during the 2009 World Port Tournament in Rotterdam, Netherlands.

Respectfully Submitted by: s/Kenia Bravo

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 22, 2013, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, and that I emailed a true and correct copy of same to Manuel Garcia Linares, mlinares@richmangreer.com, Ethan Wall, EWall@richmangreer.com, attorneys for the Defendants in *Curbelo Garcia et al v. Chapman*, Case No.12-cv-21891-Altonaga, and *Curbelo Garcia et al v. Chapman Bennett*, Case No. 13-cv-22210-Altonaga.

By: *s/Kenia Bravo*

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