

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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.

**DEFENDANTS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Defendants, Yasiel Puig Valdes and Maritza Valdes Gonzalez, serve the following request for production upon plaintiff, Miguel Angel Corbacho Daudinot, pursuant to Rule 34, Federal Rules of Civil Procedure.

DEFINITIONS

A. "Corbacho", "Plaintiff", "you", or "your" shall mean Miguel Angel Corbacho Daudinot.

B. "Document" or "Documents" shall mean all written, typed, printed, taped, and pictorial matter of any kind for nature whatsoever, however produced or reproduced, in whatever form maintained, and all non-identical (for whatever reason) copies and prior drafts thereof, in your custody or control, and includes, but is not limited to, correspondence, electronic mail, transcriptions, tapes, notes from telephone conversations, agreements, contracts, assignments, records, tape recordings (whether or not transcribed), reports, memoranda, studies, summaries, minutes, notes, agenda, bulletins, diaries, calendars, logs, announcements, instructions, charts, manuals,

brochures, schedules, computer data (whether maintained in hard copy or on a diskette, or data base) or cards or printouts, telegrams, teletype, phonographic matter, financial statements, accounting records, work sheets, pro formas, and any other such documents and tangible things. The term "document" also includes writings stored on permanent or removable magnetic or optical media, including, but not limited to, magnetic tape, floppy disks, fixed disks, mass storage devices, and optical disks; back-up copies and all versions of documents, their back-up schedule, location of back-up hardware and storage facilities, location of disaster recovery sites, a detailed description of back-up procedures, identification of all subcontractors involved in the back-up or disaster recovery processes, identification of all subcontractors involved in the back-up or disaster recovery processes, identification of back-up hardware, software and storage media; information on file formats, audit trails, logs, access records, file headers, message headers, data structures, flow diagrams, tools and development platforms that affect the documents; locations of and information about the computers, electronic or other systems upon which the documents were created, stored, backed up to, or deleted from, sufficient to enable the convenient researching, location, opening, reading, printing, storage and identification of the documents (this shall include computers of employees, subcontractors, independent contractors, service providers, agents, vendors, Internet service providers, telecommunications services providers, suppliers, or others that may contain the documents or any version thereof); all versions and modifications of documents; deleted or erased documents; and passports, codes, description tools, or other information or hardware necessary to access and use the documents. Production shall be in native form with metadata and upon media necessary for convenient access and use with

common tools, hardware, development platforms, and software. Where production will render the documents difficult or impossible to access and use without proprietary tools, hardware, development platforms, or software, production of such proprietary tools, hardware, development platforms, and software is demanded. The term document also includes copies of documents upon which notations or writings appear that are not present on the originals or other copies of such documents.

C. “Defendants” shall mean defendants Yasiel Puig Valdes and Maritza Valdes Gonzalez, collectively.

D. “Puig” shall mean defendant Yasiel Puig Valdes.

E. “Valdes” shall mean Maritza Valdes Gonzalez.

D. “Complaint” shall mean the Second Amended Complaint filed by Corbacho in this action (ECF No. 24).

INSTRUCTIONS

A. All responsive documents that are in your possession, custody or control must be produced to the office of the undersigned in accordance with Rule 34 of the Federal Rules of Civil Procedure. Possession, custody or control includes constructive possession whereby you can compel the production of a matter from a third-party.

B. These requests are intended as continuing requests, requiring you to submit a supplemental response setting forth any information within the scope of the requests that you may acquire following your original response.

C. If you contend that any documents responsive to a request are privileged, in whole or in part, please produce a privilege log and identify by date, author, recipient, distribution list and subject matter, each document which is responsive to a request but

which you are not producing based on the assertion of claim of privilege, attorney work-product, or other asserted justification for non-production. Further, please identify the privilege asserted relating to each document that is not produced. If you otherwise object to any request, state the reasons for such objection.

D. If a document has been lost, destroyed, or otherwise cannot be produced, the document shall be identified by author, date, subject matter, date of loss or destruction, the identity of the person responsible for the loss or destruction, and if destroyed, the reason for such destruction.

DOCUMENTS TO BE PRODUCED

1. All the documents referenced on page 5 of the complaint, under the header “Allegations of Fact Common to All Counts,” from which you allege the Complaint’s “allegations of fact” were derived. This request include the following documents referenced in the Complaint: the “Cuban Public Documents,” “the Defendants’ sworn DCSE declarations,” “the court testimony of PUIG and his mother, VALDES in Cuban court,” the “witness testimony given in Cuban court,” any document substantiating the “eye witness accounts of the events as they occurred,” and the “filed Court documents in the Republic of Cuba.”

2. Any documents that support the allegation in paragraph 24 of the Complaint that “PUIG tortuously, intentionally, willfully, wantonly, maliciously, knowingly, recklessly and negligently caused and/or otherwise proximately caused the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

3. Any documents that support the allegation in paragraph 25 of the Complaint that “VALDES tortuously, intentionally, willfully, wantonly, maliciously, knowingly,

recklessly and negligently caused and/or otherwise proximately caused the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

4. Any documents that support the allegation in paragraph 26 of the Complaint that “PUIG aided and abetted the DCSE and the Cuban government in tortiously, intentionally, willfully, wantonly, maliciously, knowingly, recklessly and negligently and/or otherwise proximately causing the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

5. Any documents that support the allegation in paragraph 27 of the Complaint that “VALDES aided and abetted the DCSE and the Cuban government in tortiously, intentionally, willfully, wantonly, maliciously, knowingly, recklessly and negligently and/or otherwise proximately causing the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

6. Any documents that support the allegation in paragraph 28 of the Complaint that “PUIG conspired with his mother, with the DCSE and the Cuban government in tortiously, intentionally, willfully, wantonly, maliciously, knowingly, recklessly and negligently and/or otherwise proximately causing the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

7. Any documents that support the allegation in paragraph 29 of the Complaint that “VALDES conspired with her son, with the DCSE and the Cuban government in tortiously, intentionally, willfully, wantonly, maliciously, knowingly, recklessly and negligently and/or otherwise proximately causing the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

8. Any documents that support the allegation in paragraph 30 of the Complaint that “PUIG ordered, directed, initiated, solicited and facilitated the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

9. Any documents that support the allegation in paragraph 31 of the Complaint that “VALDES ordered, directed, initiated, solicited and facilitated the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

10. Any documents that support the allegation in paragraph 32 of the Complaint that “Defendants acted with the intent to assist in the detention and torture by the DCSE and the Cuban government and initiated and cooperated with them to assist in said actions.”

11. Any documents that support the allegation in paragraph 33 of the Complaint that “The Defendants’ acts had a substantial effect upon the success of the wrongful acts of the DCSE and the Cuban government.”

12. Any documents that support the allegation in paragraph 34 of the Complaint that “Defendants had actual and constructive knowledge that their actions assisted the DCSE and the Cuban government in the arbitrary and prolonged detention and torture of CORBACHO DAUDINOT.”

13. Any documents that support the allegation in paragraph 35 of the Complaint that Puig had been a government informant.

14. Any documents that support the allegation in paragraph 37 of the Complaint that “PUIG accused... Carlos Ivan Hernandez Concepcion and ‘Pedro’... of human trafficking.”

15. Any documents that support the allegation in paragraph 46 of the Complaint that "PUIG did testify against Hernandez and Pedro."

16. Any documents that support the allegation in paragraph 47 of the Complaint that Puig accused Odalys Diaz Gonzalez and Armando Munis, of Human Trafficking.

17. Any documents evidencing any communications between Puig and any representative, employee or agent of the Cuban Government regarding Corbacho or human trafficking.

18. Any documents evidencing any meetings between Puig and any representative, employee or agent of the Cuban Government regarding Corbacho or human trafficking.

19. Any documents evidencing any communications between Puig and any representative, employee, or agent of the National Institute of Sports, Physical Education and Recreation (*Instituto Nacional De Deportes, Educación Física, y Recreación*) ("INDER") regarding Corbacho or human trafficking.

20. Any documents evidencing any meetings between Puig and any representative, employee, or agent of INDER regarding Corbacho or human trafficking.

21. Any documents evidencing any communications between Puig and any representative, employee, or agent of the Cuban Department of State Security (*Departamento de Seguridad del Estado*) ("DCSE") regarding Corbacho or human trafficking.

22. Any documents evidencing any meetings between Puig and any representative, employee, or agent of DCSE regarding Corbacho or human trafficking.

23. Any documents evidencing any communications between Valdes and any representative, employee or agent of the Cuban Government regarding Corbacho or human trafficking.

24. Any documents evidencing any meetings between Valdes and any representative, employee or agent of the Cuban Government regarding Corbacho or human trafficking.

25. Any documents evidencing any communications between Valdes and any representative, employee, or agent of INDER regarding Corbacho or human trafficking.

26. Any documents evidencing any meetings between Valdes and any representative, employee, or agent of INDER regarding Corbacho or human trafficking.

27. Any documents evidencing any communications between Valdes and any representative, employee, or agent of DCSE regarding Corbacho or human trafficking.

28. Any documents evidencing any meetings between Valdes and any representative, employee, or agent of DCSE regarding Corbacho or human trafficking.

29. Any documents evidencing communications or meetings between Puig and Higinio Vélez regarding Corbacho or human trafficking.

30. Any documents evidencing communications or meetings between Valdes and Roberto Martinez Aroche regarding Corbacho or human trafficking.

31. Any documents evidencing communications or meetings between Puig and Livian Angarica Gonzalez regarding Corbacho or human trafficking.

32. Any documents regarding Corbacho's arrest (based on the human trafficking charge), including but not limited to any documents used to support allegations 72-85 of the Complaint.

33. Any documents regarding Corbacho's trial in Cuba for human trafficking, including but not limited to any documents used to support the allegations of paragraphs 86-98 of the Complaint.

34. Any documentation concerning Corbacho's conviction in Cuba for human trafficking.

35. Any documentation concerning Corbacho's detention and/or alleged torture in Cuba, including but not limited to any documents used to support the allegations in paragraphs 99-105 of the Complaint.

36. Any documents evidencing that Defendants had any knowledge concerning Corbachos' conditions of confinement at any time from January 2010 to the present.

Respectfully submitted,

SANTINI LAW

1001 Brickell Bay Drive, Suite 2650
Miami, Florida 33131
Tel: (305) 372-7307
Fax: (305) 372-7308

By: /s/ Sean R. Santini

Sean R. Santini
Florida Bar No. 832898
ssantini@santinilawfirm.com
Averil Andrews
Florida Bar No. 105700
aandrews@santinilawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2015, I served the foregoing Request for Production of Documents, via electronic mail and U.S. Mail, upon the persons listed in the attached Service List.

By: /s/ Averil Andrews
Averil Andrews

SERVICE LIST

Kenia Bravo, Esq.
avelinogonzalez2@bellsouth.net
Law Offices of Avelino J. Gonzalez, P.A.
6780 Coral Way
Miami, FL 33155

Avelino Jose Gonzalez, Esq.
avelinogonzalez@bellsouth.net
Law Offices of Avelino J. Gonzalez, P.A.
6780 Coral Way
Miami, FL 33155