

From: [Kenia Bravo](#)
To: "[Rene Murai](#)"
Cc: "avelinogonzalez@bellsouth.net"
Subject: Corbacho Daudinot v. Puig et al.
Date: Tuesday, April 14, 2015 7:19:00 PM

Rene,

As you know, since we were nearing the deadline to send the expert report, we retained an expert on the matter, who did draft a report. We are including that report here in order to facilitate the mediation if we are, in fact, going to mediate this case.

We did receive word today from Averil Andrews, Sean Santini's associate, that they did not object to the Motion for Extension of Time, but by the time we received that information, it was too close to the deadline to make a difference. We filed the motion, but it is now moot since we already retained the expert.

We have another deadline coming up—Corbacho Daudinot's deposition is scheduled for Tuesday of next week. We need to know if we will be able to negotiate this matter before the date of that deposition because our client is not here in Miami. While he is free, and has a passport, he is waiting for the tribunal to inform DNI that he has no restriction to travel and to be removed from the list at the airport of people unauthorized to travel.

In the email that you copied to Mr. Santini, we requested if he was willing to stay the discovery process while we were negotiating, and he never responded. If he has not received a response from Puig so far, we are respectfully requesting from him to cancel the deposition to allow us to continue negotiating or permit Mr. Corbacho Daudinot to come from Cuba.

[REDACTED]

It behooves Mr. Puig to take these negotiations seriously as this case has a ten (10) year statute of limitation, and can be refilled if we are forced to do that.

As always, we rely on the confidentiality of our communications.

Sincerely,

Kenia Bravo, Esq.

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