

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIGUEL ANGEL CORBACHO DAUDINOT

Plaintiff,

CASE NO.: 1:13-cv-22589-KMW

v.

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

**NOTICE OF FILING NEWLY DISCOVERED EVIDENCE IN SUPPORT OF
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR RULE 37 SANCTIONS**

Plaintiff, by and through the undersigned counsel, files this Notice of Filing Newly Discovered Evidence in Support of Plaintiff's Response to Defendant's Motion for Sanctions, and in support thereof states:

1. On May 8, 2015, Plaintiff filed his Response to Defendants' Motion for Rule 37 Sanctions [DE 74]. At the time of filing that Response, Plaintiff was not privy to certain relevant evidence, which he learned two days ago, May 18, 2015, that brings new light to this Motion for Sanctions.

2. During March of 2015, after many months of clearing his record and obtaining permission to travel, Plaintiff went to the airport in Cuba, ready to leave the country in order to participate in the deposition scheduled for April 21, 2015.

3. The Plaintiff was boarding the plane when he was pulled out of the line because his name appeared on the DNI no-fly list. The Plaintiff assumed that his name was appearing on the list as a result of some miscommunication between bureaucratic departments regarding the early release from the sentence in his Cuban criminal case from which springs the nexus of the case at bar.

4. Plaintiff learned on Monday, May 18, 2015, that he was on the DNI no-fly list because of a 2011 Cuban criminal case, in which Yasiel Puig was once again accusing individuals of human trafficking.

5. Plaintiff was not a party to that 2011 Cuban case and has no other criminal proceedings in Cuba, however, Yasiel Puig was involved in so many cases in Cuba in which he was accusing individuals of Human Trafficking, that the Cuban court had a template for cases involving his accusations.

6. In one particular case in which Yasiel Puig was the accuser, identified by Sentence number 229 that took place on May 23, 2011 in file No. 93 of 2011, the court utilized that template, which contained portions of Corbacho Daudinot's criminal case to write the order for the 2011 case, and failed to remove Corbacho Daudinot from the sentencing portion of the order, making it appear as if Corbacho Daudinot received a second 7-year prison sentence in that 2011 case. Attached as "**Exhibit A**" is the 2011 sentence in which Yasiel Puig is accusing two other men of Human Trafficking.¹²

7. The 2011 case was one where Puig was accusing two men—Alberto Yosbel Bermudez Ferrer and Juan Carlos Lao Gonzalez—who had previously been unknown to Plaintiff, of Human Trafficking. That raises the number of known persons that Puig has accused of Human Trafficking to eleven (11), including Corbacho Daudino, Alexander Orozco Noa, Carlos Ivan Hernandez Concepcion, Pablo Camejo Reyes, Odalys Diaz Gonzalez, Armando Muñiz, Eyder Diaz Calderin, Honorio Diaz, and Captain Eugenio Cañada Perez, the last of whose family is in the United States and seeking legal grievance against Puig for Cañada's imprisonment and torture in Cuba.

8. Even though he was not part and party to the controversy in the 2011 case, Corbacho Daudinot nonetheless appears in the sentencing order, making appears as though he has a second seven-year sentence for Human Trafficking.

9. It was once again Yasiel Puig's wrongful practice of accusing persons of Human Trafficking that caused Plaintiff to be unable to come to the United States.

10. Plaintiff is now in the process of attempting to remove himself from the no-fly list due to the 2011 criminal case in which he is not even a party.

¹ On page 4 of the Cuban Order and page 4 of the translation.

² For reference, attached as "**Exhibit B**" is the Cuban Criminal sentence of Corbacho Daudinot, Sentence No. 405, from October 2010 in the file No. 339 of 2010. On page 5 of this order is the wording of his sentence, which was exactly reproduced in the 2011 case, of which he was not a party, but in which he appears in the sentencing order.

11. This new evidence is particularly pertinent to opposing Defendants' Motion for Sanctions because Defendants are claiming throughout their Motion and Reply that Plaintiff acted in bad faith in failing to appear for his deposition, when it was Defendants' continued practice of accusing persons indiscriminately of Human Trafficking in Cuba that kept Plaintiff from attending the deposition or coming to the United States.

By: s/Kenia Bravo
Kenia Bravo, Esq., FBN 68296
Avelino J. Gonzalez, Esq., FBN 75530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing document was filed using CM/ECF on May 21, 2015 and that there are no other persons of interest who need to be served.

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