

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PUERTO RICO SOCCER LEAGUE NFP CORP.,
a Puerto Rico for profit corporation, JOSEPH
MARC SERRALTA IVES, MARIA
LARRACUENTE, JOSE R. OLMO-RODRIGUEZ,
and FUTBOL BORICUA (FBNET), INC.,

Plaintiffs,

v.

FEDERACION PUERTORRIQUENA DE
FUTBOL, INC., IVAN RIVERA-GUTIERREZ,
JOSE “CUKITO” MARTINEZ, GABRIEL ORTIZ,
LUIS MOZO CANETE, JOHN DOE 1-18,
INSURANCE COMPANIES A, B, C,
FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION (FIFA), and
CONFEDERATION OF NORTH, CENTRAL
AMERICA AND CARIBBEAN ASSOCIATION
FOOTBALL (CONCACAF),

Defendants.

CIVIL ACTION NO. 23-1203-
RAM

FIFA’S APPLICATION FOR ATTORNEYS’ FEES

TO THE HONORABLE COURT:

COMES NOW Fédération Internationale de Football Association (“FIFA”), by and through its undersigned counsel, and respectfully submits its Application for [REDACTED] in Attorneys’ Fees in compliance with the Court’s Opinion and Order dated April 10, 2025, ECF No. 206 (the “Order”).

I. INTRODUCTION

This Court ordered sanctions against Plaintiffs’ counsel after determining that they filed four briefs (ECF Nos. 174–177, together, the “Sanctioned Briefs”) that contained a myriad of cases that did not exist, quotations that did not appear in their attributed cases,

and cases that were entirely misrepresented. Order at 11–37. All told, the Sanctioned Briefs contained no less than **55** defective citations. Indeed, as the Court observed, Plaintiffs’ counsel’s “misuse of quotation marks was so prevalent that it was unusual . . . to find a quotation provided by Plaintiffs within the case it was attributed to.” Order at 6. As a result of this misconduct, the Court ordered Plaintiffs’ counsel to “pay the attorneys’ fees incurred by [FIFA, CONCACAF and the FPF Defendants¹], in relation to Plaintiffs’ filings,” and ordered Defendants to “submit an itemized application for attorney’s fees” reflecting the fees incurred. Order at 10.

Plaintiffs’ misconduct was not merely unethical, but also costly for FIFA. As reflected in the Declarations of H. Christopher Boehning and Roberto A. Cámara-Fuertes and their accompanying exhibits, and set forth more fully herein, FIFA incurred significant legal fees responding to Plaintiffs’ voluminous and defective briefing. While every single dollar incurred was the necessary and direct result of Plaintiffs’ misconduct, FIFA does not seek its full incurred costs using its counsel’s actual rates. Rather, FIFA respectfully submits its application for [REDACTED], a portion of the costs it actually incurred, using a lodestar calculation that applies an hourly rate consistent with the ordinary rates in the District to the reasonable hours incurred by its primary drafting attorneys in responding to Plaintiffs’ submissions, adjusted for the complexity associated with this antitrust case and counsel’s experience.

¹ As defined in Defendants’ motions at ECF Nos. 164, 168, 196, and collectively, “Defendants.”

II. BACKGROUND²

Upon receiving Plaintiffs’ three defective opposition briefs on March 9, 2025, Defendants attempted to reasonably divide primary responsibility for drafting the necessary reply briefing. FIFA’s counsel at Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”) took the primary drafting role in responding to Plaintiffs’ opposition to the Joint Motion for Protective Order and Rule 502(d) Order and Memorandum in Support Thereof, with support from its co-counsel Ferraiuoli LLC (“Ferraiuoli, and, together with Paul, Weiss, “FIFA’s Counsel”), and reviewed the two other reply briefs for which counsel for other defendants took primary drafting responsibility. Boehning Decl. ¶ 8. Paul, Weiss was also the counsel that initially identified the pattern suggesting potential unsupervised use of artificial intelligence.³ *Id.* Paul, Weiss, with support from Ferraiuoli, likewise took the lead role and primary responsibility for assessing and responding to Plaintiffs’ memorandum purportedly showing cause as to why sanctions should not be levied, which attached three substantive (and improper) sur-reply briefs with still further defective citations. *Id.* Defendants’ response was filed on March 25, 2025. *See* ECF No. 197.

FIFA’s Counsel expended significant time attempting to locate Plaintiffs’ nonexistent quotations and cases, and researching the appropriate procedural means by which to bring these issues to the Court’s attention—in addition to determining, notwithstanding Plaintiffs’ phantom cases and quotations, whether and to what extent

² Because the Court is familiar with the relevant background of this suit, FIFA only restates the facts pertinent to this motion, and insofar as they are relevant to FIFA’s costs.

³ Because several cases were not reasonably identifiable based on their attributed citations, and at least one could only be identified on ChatGPT—as well as the extraordinarily rapid submission of nearly 30 pages’ worth of legal briefing within 72 hours—Defendants concluded that it appeared likely Plaintiffs had used generative AI to prepare their Oppositions and Supplement without appropriate oversight. *See* ECF No. 183 at 2.

Plaintiffs’ legal contentions had merit in order to provide substantive responses. Boehning Decl. ¶¶ 5–7.

All told, Paul, Weiss—specifically, partners H. Christopher Boehning and Tiana Voegelin, and associates Yoav Gaffney and Tian Lei—reasonably expended [REDACTED] hours researching and responding to Plaintiffs’ Sanctioned Briefs. Boehning Decl. ¶ 13. Paul, Weiss has excluded from this calculation all time that was spent on Plaintiffs’ deficient filings by more junior associates, other senior attorneys who did not hold a primary drafting role, paralegals, research and E-Discovery specialists, and docketing clerks, and has not included time preparing this submission. Boehning Decl. ¶¶ 11–13. Co-counsel Ferraiuoli—and, specifically, Capital Member Roberto A. Cámara-Fuertes and Member Suleicka Tulier-Vázquez—spent [REDACTED] hours supporting those efforts and ensuring compliance with local rules and laws. Cámara-Fuertes Decl. ¶¶ 3–5, 9.

III. LEGAL STANDARD

A district court has broad discretion to determine appropriate sanctions for misconduct in light of the particular facts of the case and the conduct at issue. *See, e.g., Lancellotti v. Fay*, 909 F.2d 15, 19–20 (1st Cir. 1990) (“It is likewise for [the trial court] to decide what sanction is ‘appropriate’ [concerning] a particular violation”). Where, as here, the Court awards attorneys’ fees as sanctions, the “lodestar” approach is used to

calculate the appropriate reimbursement. *Salinas v. Bart Enters. Int'l, Ltd.*, 2008 WL 11357962, at *1 (D.P.R. June 13, 2008). Under the lodestar approach:

First, the court determines “the number of hours reasonably expended” on the at-issue work, excluding hours that are duplicative or unnecessary to the subject of the award. *Perez-Sosa v. Garland*, 22 F.4th 312, 321 (1st Cir. 2022).

Second, the court multiplies those hours by the “prevailing rates in the community for comparably qualified attorneys.” *Guillemard-Ginorio v. Contreras*, 603 F. Supp. 2d 301, 313 (D.P.R. 2009). In determining the reasonable hourly rate, the court looks “to a constellation of factors,” including the rate that the particular attorney “actually charges to clients in the ordinary course of [her] practice” and “data evidencing the prevailing market rate for counsel of comparable skill.” *Perez-Sosa*, 22 F.4th at 325.

Third, while the resulting lodestar fee from the first two steps is presumptively reasonable, courts have discretion to adjust the lodestar upward or downward based on the circumstances, including to achieve an appropriately sized deterrent in the context of sanctions. *See Lipsett v. Blanco*, 975 F.2d 934, 937 (1st Cir. 1992); *Perez-Sosa*, 22 F.4th at 321.

IV. ARGUMENT

FIFA has taken a conservative approach in calculating its fee request. The rates being requested reflect prevailing local rates, adjusted for counsel’s experience, the unique complexities and facts of this case, and the nature of Plaintiffs’ conduct. The number of hours being requested is also reasonable, containing only the legal hours involved in researching, drafting, preparing, and filing briefs challenging Plaintiffs’ Sanctioned Briefs—and only for the attorneys primarily involved in those endeavors, excluding significant time spent by other attorneys and support personnel. Accordingly, FIFA

requests an adjusted lodestar amount of [REDACTED], reflecting (1) a discounted rate of [REDACTED] per hour for two Paul, Weiss partners and a discounted rate of [REDACTED] per hour for two Paul, Weiss associates as documented in Boehning Declaration Exhibit A, and (2) a blended rate of [REDACTED] per hour for the Ferraiuoli members serving as co-counsel as documented in Cámara-Fuertes Declaration Exhibit A. FIFA recognizes and appreciates that the Court has discretion to adjust this requested amount to achieve the sanctions it deems reasonable as a deterrent in the circumstances.

a. FIFA’s Requested Fees for Paul, Weiss’s Work Are Reasonable

i. Paul, Weiss’s Proposed Hourly Rates Are Reasonable

The requested hourly rates of [REDACTED] for Paul, Weiss partners and [REDACTED] for Paul, Weiss associates are reasonable and reflect a significant reduction from Paul, Weiss’s actual hourly rate. A reasonable hourly rate will “vary depending on the nature of the work, the locality in which it is performed, the qualifications of the lawyers, and other criteria.” *Carrero v. Molina Healthcare of Puerto Rico, Inc.*, 737 F. Supp. 3d 135, 145 (D.P.R. 2024) (Arias-Marxuach, J.) (internal quotation omitted). A “court may deem the ‘relevant community’ to be the community in which the lawyer maintains his or her principal office” and “look to the lawyer’s actual billing practices to determine the relevant rate.” *United States v. One Star Class Sloop Sailboat built in 1930 with hull no. 721 named “Flash II”*, 546 F.3d 26, 40 (1st Cir. 2008).

In New York, where Paul, Weiss is based, courts have approved rates up to \$900 in comparably complex litigation. *See In re 3D Sys. Sec. Litig.*, 2024 WL 50909, at *15 & n.14 (E.D.N.Y. Jan. 4, 2024) (collecting sources and noting that New York federal courts have approved hourly rates ranging from \$225 to \$900). FIFA recognizes, however, that the litigation is taking place in the District of Puerto Rico, and desires to be reasonable and

conservative in its request. It has, as a result, assessed local prevailing rates in the District, and calculated its requested Paul, Weiss rates accordingly.

In assessing rates in this District, the Court ruled in *Carrero*—a simple breach of contract case—that although the approximate range of rates for highly experienced attorneys in this District is \$250 to 300 for partners and \$150 to 200 for associates, an upward adjustment to \$350 per hour rate for partners and \$225 to 250 per hour rate for associates at a national law firm was appropriate, given the “reputation, capabilities, and experience of Defendant’s counsel, as well as the . . . legal work performed.” *Carrero*, 737 F. Supp. 3d at 146–47.

Here, the facts warrant a greater increase above the local rates than was warranted in *Carrero*. *Carrero* concerned a discrete breach of contract claim, whereas this case requires antitrust subject-matter expertise and a deep understanding of complex antitrust law, the sports industry, and FIFA’s rules and policies. *See id.* at 140. Like the nationally recognized firm in *Carrero*, Paul, Weiss is a multinational law firm, “one of the oldest and largest in the world.” *See id.* at 146. However, Paul, Weiss is specifically (and internationally) recognized as a market leader in both complex antitrust litigation and in sports law. *See* Boehning Decl., Exs. C & D (Paul, Weiss’s antitrust and sports law awards and recognitions). As reflected in the attachments to the Boehning Declaration, the Paul, Weiss attorneys who worked on the Sanctioned Briefs have significant, specialized, prior experience in complex and antitrust litigation, including in the sports-related industry specifically. *See* Boehning Decl., Exs. A (attorney time entries), B (attorney biographies). Moreover, Paul, Weiss partners H. Christopher Boehning and Tiana Voegelin, as well as

associate Tian Lei, served as attorneys for FIFA in connection with *Relevant Sports, LLC v. U.S. Soccer Fed'n, Inc.*, 1:19-cv-8359 (S.D.N.Y.).

FIFA's decision to hire such experienced counsel was reasonable in light of the nature of this litigation. Indeed, Plaintiffs' case alleged that FIFA (along with the other Defendants) violated, *inter alia*, the U.S. antitrust laws and the Racketeer Influenced Corrupt Organizations Act, both of which contain provisions for the trebling of damages and threaten substantial financial liability. *See* 15 U.S.C.S. § 15; 18 U.S.C. § 1964(c).

Considering the rates granted by this Court in *Carrero*, as adjusted for the increased complexity and circumstances of this matter, FIFA's potential liability, the rates in New York (Paul, Weiss's jurisdiction), and the significant specialized expertise of Paul, Weiss, FIFA requests a lodestar rate of [REDACTED] per hour for Paul, Weiss partners, and [REDACTED] per hour for Paul, Weiss associates. *See* Boehning Decl., Exs. A & B; *also Linde v. Arab Bank, PLC*, 293 F.R.D. 138, 141 (E.D.N.Y. 2013) (issuing sanctions of attorneys' fees and determining that the requested rates of \$655 per hour for partners was reasonable); *Reisman v. Ne. Power & Gas LLC*, 720 F. Supp. 3d 279, 293 (S.D.N.Y. 2024) (collecting cases supporting reasonableness of hourly rates ranging from \$420 to \$695 per hour); *Tessemae's LLC v. Atlantis Cap. LLC*, 2019 WL 2635956, *4 (S.D.N.Y. June 27, 2019) (collecting cases supporting reasonableness of hourly rates up to \$1,260 per hour). If upheld, the Court would be imposing a fee award of [REDACTED] for work conducted by Paul, Weiss, reflecting only a portion of the fees charged to FIFA for the relevant submissions.

ii. Paul, Weiss Expended a Reasonable Number of Hours in Connection with the Sanctioned Briefs

Reasonableness in the context of the number of hours expended by counsel "is largely a matter of informed judgment." *Torres-Rivera v. O'Neill-Cancel*, 524 F.3d 331,

336 (1st Cir. 2008). The First Circuit has “never required that district courts set forth hour-by-hour analyses of fee requests,” but merely to “make concrete findings” premised upon a “sense of overall proportion.” *United States v. Metro Dist. Comm’n*, 847 F.2d 12, 16 (1st Cir. 1988) (internal quotation and citation omitted); *see also Serrano v. Ritz-Carlton San Juan Hotel Spa & Casino*, 808 F. Supp. 2d 393 (D.P.R. 2011) (the “objectives” of a sanctions fee award “may be better met by concentrating on what was necessary to be accomplished rather than on a welter of time sheets.”).

All told, as set forth in Exhibit A, Paul, Weiss—specifically, partners H. Christopher Boehning and Tiana Voegelin, and associates Yoav Gaffney and Tian Lei—reasonably expended [REDACTED] hours researching and responding to Plaintiffs’ Sanctioned Briefs. Notably, Paul, Weiss has excluded from this calculation all time that was spent on Plaintiffs’ deficient filings by more junior associates, other senior attorneys who did not hold a primary drafting role, paralegals, research and E-Discovery specialists, and docketing clerks, and has also excluded all time spent preparing this application.

First Circuit courts have deemed longer time periods spent on shorter briefing to be reasonable, and there is no basis for a different conclusion here. *See Grendel’s Den, Inc. v. Larkin*, 749 F.2d 945, 955 (1st Cir. 1984) (200 hours for a 17-page motion to affirm, 37-page response brief, and two-page supplemental statement at the upper limit of reasonableness); *Gabriele v. Southworth*, 712 F.2d 1505, 1507 (1st Cir. 1983) (72 hours for an attorney’s time dedicated to one appellate brief was reasonable). The Sanctioned Briefs presented additional complexity.

To properly brief the Court on the issues contained in the Sanctioned Briefs, FIFA’s Counsel needed to research dozens of cases that either did not exist or had otherwise been

misquoted or misrepresented, in whole or in part, by Plaintiffs’ Sanctioned Briefs (Order at App’x), and to confirm those misquotes and mischaracterizations did not validly appear elsewhere in sum or substance. Boehning Decl. ¶¶ 5–8 & Ex. A. The responsive briefs also addressed Plaintiffs’ legal assertions, which was substantially harder given that Plaintiffs’ contentions were largely not grounded in the proffered case law. *See* Order at 6 (“The misuse of quotation marks was so prevalent that it was unusual for the Court to find a quotation provided by Plaintiffs within the case it was attributed to.”). FIFA’s Counsel also conducted additional legal research on the applicable Model Rules, as well as under Federal Rule of Civil Procedure 11, to brief the Court on Plaintiffs’ ethical violations and to ensure that Defendants’ briefs were consistent with procedural requirements.

Paul, Weiss is the counsel that identified the pervasive issues with Plaintiffs’ briefing and initiated conducting extensive diligence to confirm its suspicions were founded before raising them with the Court. Paul, Weiss also took the lead role and primary responsibility for Defendants’ Joint Reply In Support of their Motion for Entry of a Protective and Confidentiality Order and Rule 502(d) Order, ECF No. 183, including researching the cited cases, identifying the deficiencies, and drafting a joint response to the Court for all defendants, to aid the Court’s identification of the continued discrepancies. FIFA’s Counsel likewise took primary responsibility for preparing Defendants’ opposition to Plaintiffs’ Show Cause Brief—including its three improper yet substantive proposed sur-replies—which required further extensive legal analysis, review, and briefing. Boehning Decl. ¶ 6.

The legal issues handled by FIFA’s Counsel were complex, and the time required to complete those submissions was substantial. FIFA’s Counsel’s hours are reasonable,

account only for substantive legal time spent on the filings at issue, have not accounted for the time of other team members without primary responsibility in the filings or any supporting personnel, and should not be further reduced in calculating the appropriate fee award.

b. FIFA’s Requested Fees for Ferraiuoli’s Work Are Reasonable

Attorneys not admitted to practice in Puerto Rico may seek limited admission *pro hac vice* pursuant to Local Rule 83A(f), which imposes specific conditions: (1) the designation of a member of this Court as local counsel; (2) an attestation that the applicant is not currently suspended from practicing law in any jurisdiction; and (3) payment of the applicable fee. D.P.R. Civ. R. 83A(f). Critically, both the *pro hac vice* attorney and the designated local counsel “[s]hall sign all filings submitted to the Court.” *Id.* As the First Circuit has recognized, “[t]he local rules require ... local counsel [] to be deeply involved in all proceedings in the case conducted by pro hac vice counsel.” *Young v. City of Providence ex rel. Napolitano*, 404 F.3d 4, 24 (1st Cir. 2005); *see also* D.P.R. Civ. R. 83A(f).

The rationale for this requirement is well-founded. The involvement of local counsel addresses the challenges that naturally arise from *pro hac vice* counsel’s lack of proximity to Puerto Rico and their unfamiliarity with its unique rules, practices, and substantive law. *See, e.g., Butler v. Biocore Medical Technologies, Inc.*, 348 F.3d 1163, 1174–75 (10th Cir. 2003) (citing *Ingemi v. Pellino & Lentz, P.C.*, 866 F. Supp. 156, 162 (D.N.J. 1994) (observing that “[l]ocal rules requiring local counsel to take more than a [de minimis] role” are critical because local attorneys are expected both to educate *pro hac vice* attorneys and to enforce local norms)); *Mowrer v. Warner-Lambert Co.*, 1998 WL 512971, at *1 (E.D. Pa. Aug. 19, 1998) (“[Local counsel] rule [is] predicated upon a notion

that familiarity with local rules and procedures advances the goal of the efficient administration of justice.”).

Recognizing that the role of local counsel is neither perfunctory nor ceremonial, Ferraiuoli, as local counsel for the Paul, Weiss attorneys in this matter, has taken an active and substantive role in the representation of FIFA, and has acted as co-counsel. In doing so, Ferraiuoli has fulfilled the expectations of this Court, ensuring that the *pro hac vice* attorneys remain properly guided in all aspects of the applicable local and substantive law, while diligently avoiding any duplication of efforts.

FIFA has engaged Mr. Roberto A. Cámara-Fuertes and Ms. Suleicka Tulier-Vázquez as co-counsel, each of which has 25 and nine years of experience respectively. Cámara-Fuertes Decl. ¶ 10. Mr. Cámara-Fuertes and Ms. Tulier-Vázquez have worked together on numerous high-profile antitrust cases and are recognized as the firm’s foremost practitioners in handling complex antitrust litigation.⁴ Ferraiuoli’s contributions encompassed [REDACTED] hours of work by Mr. Cámara-Fuertes and [REDACTED] hours by Ms. Tulier-Vázquez, totaling [REDACTED] hours dedicated to addressing Plaintiffs’ four motions filed at Docket Nos. 174–177. Cámara-Fuertes Decl. ¶ 11. It is entirely reasonable to conclude that devoting fewer than [REDACTED] hours per local counsel per Sanctioned Motion falls well within the bounds of what is appropriate and justified.

As previously noted, in the District of Puerto Rico, an approximate range of typical rates for experienced attorneys is \$250 to 350.⁵ However, as recognized by the First

⁴ For example, *Government of Puerto Rico v. Toyota Motor Corporation, et al.*, SJ2019CV04389; *Gobierno de Puerto Rico v. AU Optronics Corporation, et al.*, SJ2018CV04695; and *Total Petroleum Puerto Rico, Corp. v. Autoridad de los Puertos de Puerto Rico*, 210 DPR 16 (2022).

⁵ See *Skytec, Inc. v. Logistic Sys., Inc.*, 2019 WL 1271459, at *4–5 (D.P.R. 2019); *Bd. of Trs. v. ILA Loc. 1740*, 2022 WL 4591843, at *3 (D.P.R. 2022) (citation omitted); *Arelene Ocasio v. Comisión Estatal*

Circuit, “each case is unique and rates inflate over time.” *Martinez-Velez v. Rey-Hernandez*, 506 F.3d 32, 47 (1st Cir. 2007).

While Ferraiuoli’s hourly rates for Capital Members and Members are typically higher than the [REDACTED] to [REDACTED] range, FIFA wishes to be reasonable in its request and as a result, in this instance, Ferraiuoli is proposing a blended rate of [REDACTED] per hour for Mr. Roberto A. Cámara-Fuertes and Ms. Suleicka Tulier-Vázquez. As evidenced by the parties’ briefing on these issues, as well as examples of fee awards from other cases in this district, the proposed blended rate of [REDACTED] per hour totaling [REDACTED] for local counsel’s contributions falls squarely within the scope of the reasonable attorneys’ fees granted in this district.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court award Plaintiffs’ reasonable attorneys’ fees and expenses in the amount of [REDACTED].

De Elecciones, 2023 WL 8889653, at *3 n.5 (D.P.R. 2023) (citations omitted); *Concilio de Salud Integral v. JC Remodeling, Inc.*, 2023 WL 3081964, at *2 (D.P.R. 2023) (citations omitted), and *J. Walter Thompson P.R., Inc. v. Latin Am. Music Co.*, 2018 WL 7246980, at *5 (D.P.R. 2018), *report and recommendation adopted in part, rejected in part*, 355 F. Supp. 3d 110 (D.P.R. 2019) (finding \$350 a reasonable hourly rate); *Rivera-Molina v. Casa La Roca, LLC*, 2022 WL 897145, at figures 1–3 (D.P.R. 2022) (same).

RESPECTFULLY SUBMITTED,

Dated: May 1, 2025

FERRAIUOLI, LLC

/s/ Roberto A. Cámara-Fuertes

Roberto A. Cámara-Fuertes

USDC-PR No. 219002

Suleicka Tulier- Vázquez

USDC-PR No. 305111

P.O. Box 195168

San Juan, PR 00919-5168

Tel: (787) 766-7000

Fax: (787) 766-7001

Email: rcamara@ferraiuoli.com

stulier@ferraiuoli.com

PAUL, WEISS, RIFKIND,

WHARTON & GARRISON LLP

H. Christopher Boehning (*pro hac vice*)

1285 Avenue of the Americas

New York, New York 10019-6064

Tel: (212) 373-3000

Fax: (212) 757-3990

Email: cboehning@paulweiss.com

Attorneys for Defendant FIFA

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/Dkt. system which will send notification of such filing to all counsel of record.

Dated: May 1, 2025.
San Juan, Puerto Rico

/s/ Roberto A. Cámara-Fuertes
Roberto A. Cámara-Fuertes
USDC-PR No. 219002
Ferraiuoli LLC
San Juan, PR 00919-5168
rcamara@ferraiuoli.com
Phone: (787) 766-7000
Fax: (787) 766-7001

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PUERTO RICO SOCCER LEAGUE NFP
CORP., a Puerto Rico for profit corporation,
JOSEPH MARC SERRALTA IVES, MARIA
LARRACUENTE, JOSE R. OLMO-
RODRIGUEZ, and FUTBOL BORICUA
(FBNET), INC.,

Plaintiff,

v.

FÉDÉRATION PUERTORRIQUENA DE
FUTBOL, INC., IVAN RIVERA-GUTIERREZ,
JOSE “CUKITO” MARTINEZ, GABRIEL
ORTIZ, LUIS MOZO CANETE, JOHN DOES 1-
18, INSURANCE COMPANIES A, B, C,
FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION (“FIFA”), and
CONFEDERATION OF NORTH, CENTRAL
AMERICA AND CARIBBEAN ASSOCIATION
FOOTBALL (CONCACAF),

Defendants.

CIVIL ACTION NO. 23-1203-
RAM

**DECLARATION OF H. CHRISTOPHER BOEHNING IN SUPPORT OF
FIFA’S APPLICATION FOR ATTORNEYS’ FEES**

I, H. Christopher Boehning, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”), and am lead counsel of record for Defendant Fédération Internationale de Football Association (“FIFA”) in the above-captioned case. I am a member of the state bar of the State of New York and have been admitted *pro hac vice* in this action.

2. I submit this declaration in support of FIFA’s Application for Attorneys’ Fees being submitted in compliance with this Court’s Opinion and Order on Plaintiffs’

Memorandum in Compliance, ECF No. 206. I have first-hand knowledge of the facts stated herein and I could and would testify competently thereto if called as a witness.

3. FIFA first retained Paul, Weiss to represent it in the above-captioned matter in September 2023.

4. Paul, Weiss has been representing FIFA in several actions in U.S. Courts since October 2014, including in connection with civil litigation arising under the antitrust laws.

5. Upon review of Plaintiffs' opposition briefs submitted on March 9, 2025, ECF Nos. 174–176, and supplemental opposition brief submitted on March 13, 2025, ECF No. 177 (collectively, the “Sanctioned Briefs”), Paul, Weiss determined that Plaintiffs' submissions appeared to include inaccurate citations, quotations, and nonexistent cases. I directed the attorneys on the case team to conduct a comprehensive review of Plaintiffs' submissions to determine the extent of these issues. When the extent of Plaintiffs' citation defects became clear, I instructed the team to research the legal standard applicable to filings of this nature, and the appropriate procedural mechanism by which to present this issue to the Court.

6. Following Plaintiffs' submission of a Memorandum Showing Cause Why Sanctions Should Not Be Levied, ECF No. 190 and accompanying sur-replies attached as exhibits 1-3, I again directed the attorneys on this case team to conduct a comprehensive review of Plaintiffs' submissions. When it became clear that Plaintiffs' submission was equally defective, I directed the attorneys on my case team to prepare a submission to appropriately brief the Court on these issues.

7. The work performed in connection with the Sanctioned Briefs and Plaintiffs' Memorandum Showing Cause included reviewing the briefs and citations contained therein, conducting legal research regarding sanctions for misuse of generative AI and inaccurate

case citations, conducting legal research regarding the substantive legal arguments proffered by Plaintiffs, searching for and identifying Plaintiffs' proffered case law and quotations, researching the accuracy of Plaintiffs' legal assertions, and drafting responsive briefs and motions.

8. Paul, Weiss took the primary drafting role in responding to Plaintiffs' opposition to the Joint Motion for Protective Order and Rule 502(d) Order and Memorandum in Support Thereof. Paul, Weiss also identified the pattern suggesting potential unsupervised use of artificial intelligence. Further, Paul, Weiss took the lead role and primary responsibility for assessing and responding to Plaintiffs' Memorandum Showing Cause Why Sanctions Should Not Be Levied, including researching the cases, identifying further deficiencies, and drafting a joint response to the Court for all defendants.

9. Paul, Weiss issues FIFA monthly invoices for services rendered in this matter. Each Paul, Weiss attorney's time is recorded in six-minute increments for inclusion in the monthly invoices submitted to FIFA.

10. Attached as **Exhibit A** is a true and correct copy of Paul, Weiss's time entries relating to the Sanctioned Briefs from March 9, 2025, through April 11, 2025.

11. The time entries in the attached **Exhibit A** do not include any work performed by Paul, Weiss in relation to any other aspect of this matter other than the Sanctioned Briefs or in relation to any other matter, and also exclude any time spent preparing this submission.

12. The time entries include work performed by myself, my partner Tiana Voegelin, and mid-level associates Tian Lei and Yoav Gaffney. I have excluded all time that was spent on Plaintiffs' deficient filings by more junior associates, other senior attorneys who did not hold a primary drafting role, paralegals, research and E-Discovery specialists, docketing clerks, and other non-legal work.

13. While Paul, Weiss charges significantly higher rates, I believe that the proposed rates in the accompanying fee request reflect prevailing local rates for the services provided, adjusted for the complexities of this case, and the experience and expertise of the attorneys listed below. The law firm biographies detailing the credentials and experience of the attorneys listed below are attached hereto as **Exhibit B**.

Attorney	Position	Years of Experience	Proposed Hourly Rate	Hours Spent
H. Christopher Boehning	Partner	31	██████████	██████████
Tiana Voegelin	Partner	9	██████████	██████████
Yoav Gaffney	Mid-Level Associate	5	██████████	██████████
Tian Lei	Mid-Level Associate	4	██████████	██████████

14. Attached as **Exhibit C** is a true and correct copy of a page on Paul, Weiss's website reflecting Paul, Weiss's industry recognition in antitrust law.

15. Attached as **Exhibit D** is a true and correct copy of a page on Paul, Weiss's website reflecting Paul, Weiss's industry recognition in sports law.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 1, 2025.
New York, New York

/s/ H. Christopher Boehning
H. Christopher Boehning

EXHIBIT A
FILED UNDER SEAL

EXHIBIT B

Chris Boehning, Partner (cboehning@paulweiss.com)

A partner in the Litigation Department, Chris Boehning serves as co-chair of the firm's International Practice, Insurance Practice and Sports Practice, and as chair of the International Arbitration Practice. Noted by clients as a "truly outstanding" advocate, Chris has been characterized in *Chambers* as an "extremely bright, calm and very articulate" lawyer who "always plans his strategies four moves in advance."

EXPERIENCE

Chris has more than 30 years of experience representing clients in a wide variety of high-stakes complex commercial and civil litigation matters, insurance-related issues and litigation, criminal, civil and other regulatory inquiries, internal investigations, and international arbitrations sited in Paris, London, Tokyo and New York. Chris also maintains a very active sports practice, for which *The Legal 500* has praised his "impressive understanding of all the legal issues as well as deep knowledge of the soccer world."

Chris's significant representations include:

- **FIFA**, as regular outside counsel in the U.S. for a broad range of litigation, arbitration, corporate, and regulatory matters, including:
 - a host of matters related to the FIFA World Cup and the FIFA Club World Cup;
 - its successful application for \$201 million in remission from the U.S. Department of Justice as compensation for losses the organization suffered as a victim of decades of corruption schemes by former soccer officials, for which Chris was recognized in *The American Lawyer's* "Litigation Daily" newsletter;
 - the settlement of and dismissal from a litigation brought by Relevant Sports over an attempt to bring a LaLiga match to the U.S.;
 - the dismissal with prejudice of a putative class action lawsuit challenging FIFA's rules around concussions and other head injuries;
- **CNA** in multiple matters, including as national coordinating counsel handling the company's response to COVID-19-related litigation, in which Paul, Weiss has to date secured victories in over 80 trial-level dispositive motions and in more than 20 federal and state appeals;
- **Federal Insurance Company** (a member of the **Chubb Group of Insurance Companies**) in multiple matters, including:
 - the dismissal of a putative class action regarding the marketing of disability insurance policies;

- a \$20 million arbitration award, confirmed by the Third Circuit, for a dispute with Interdigital Communications Corporation;
 - the successful defense of multiple business interruption claims arising out of the September 11 terrorist attacks, including a summary judgment award affirmed by the Fifth Circuit;
- **Hughes Communications India Private Limited (HCIPL**, a subsidiary of **EchoStar Corporation**) in litigation against former parent DirectTV, including a successful appeal in which the Second Circuit held that DirecTV must indemnify HCIPL for damages arising out of certain contractually defined Indian taxes and proceedings;
- **Deutsche Bank** in multiple matters, including subprime inquiries and related litigation, and the dismissal, affirmed by the Appellate Division of the New York Supreme Court, First Department, of a CDO-related litigation brought by Aozora Bank, Ltd.;
- **Lehman Brothers** in connection with research analyst and mutual fund inquiries and related litigation, as well as subprime inquiries and related litigation;
- **Sumitomo Corporation** in multiple matters, including the successful appeal of a copper trading litigation before the First Department, which dismissed Sumitomo;
- **Two major oil and natural gas producers** in a \$46 million arbitration victory in London for a dispute against their reinsurer;
- **A large chemical company** in international arbitrations and breach of contract disputes, including over \$30 million awarded in proceedings before the ICC International Court of Arbitration;
- **A major Japanese corporation** in international arbitration against a Chinese solar energy company;
- **A major financial institution** in a sanctions investigation by the Office of Foreign Assets Control (OFAC) regarding business dealings related to a higher-risk foreign jurisdiction;
- **A large, multinational bank** in various matters, including the resolution of a major multi-regulator, sanctions-related enforcement matter; and
- **Multiple major Chinese financial institutions** in connection with various sanctions, Bank Secrecy Act and anti-money laundering (AML) matters.

Examples of additional notable representations include **Agricultural Bank of China, Alcoa, Bank of China, Bank of Tokyo-Mitsubishi, Boeing, Brainlab AG, Canadian Natural Resources Ltd., Citigroup, Commerzbank, General Electric,**

Infront Sports & Media, ING, Jack Black, MoMA, Nexen, Regeneron, Sharp, Softbank, Standard Chartered, and Swiss Re.

Chris also maintains a robust pro bono practice, with a particular focus on gun violence prevention. A co-founder of the Firearms Accountability Counsel Task Force (FACT), Chris is actively involved in litigations addressing the gun violence epidemic, including:

- A landmark \$73 million settlement for the **Sandy Hook families** in their wrongful death suit against Remington Arms—the first suit of its kind nationally to pierce the legal immunity of firearms manufacturers and hold them accountable for the harm caused by their products;
- A settlement against a Texas gun dealer on behalf of a woman whose husband was killed with a gun sold by the dealer, as a result of which the dealer agreed to implement written policies regarding firearm sale or pawn redemption procedures, as well as mandatory annual trainings for all employees who handle firearms; and
- Lawsuits in Illinois state court brought by survivors of the **Highland Park mass shooting** against Smith & Wesson, whose “clearly improper” attempt to remove the case to federal court was rejected by the district court and the Seventh Circuit, resulting in the district court recently ordering Smith & Wesson to pay the survivors’ attorneys’ fees.

AWARDS AND RECOGNITIONS

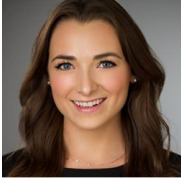
A fellow of the American Bar Foundation, Chris has been recognized for his numerous legal achievements. Clients appreciate the broad scope of his experience, which ranges from complex litigation to insurance matters. *Chambers USA* recognizes Chris as a highly regarded financial services regulation practitioner with “impressive expertise in enforcements by SEC, CFTC, FINRA and the DOJ, backed by impressive experience as a litigator.” Chris is consistently named a “Local Litigation Star” (NY) and National Litigation Star (U.S.) by *Benchmark Litigation* for Insurance and General Commercial Litigation. He was recently named to *Lawdragon*’s 2025 “500 Leading Litigators in America” list, the second year in a row he has been featured, as well as its 2024 “500 Leading Global Litigators” list, in which he has been named since its inception in 2021. He is an honorary member of COMBAR.

Chris is a “driving force behind” Paul, Weiss’s Sports Practice, which routinely garners the highest accolades for its “excellent” work, including its recent recognition as *Law360*’s 2022, 2023, and 2024 “Practice Group of the Year,” as well as recognitions by *The Legal 500* and *Chambers USA*. In 2025, he was named to *Lawdragon*’s inaugural “500 Leading Global Entertainment, Sports & Media Lawyers” list. He was also recently named in *Lexology Index*’s 2024 Sports & Gaming, which highlights individuals that are considered to be leaders in the field. Since 2019, *The Legal 500* has listed Chris as a recommended lawyer in the Sports industry, describing him as a “superb lawyer.” *Chambers USA* has recognized Chris in its Sports Law category since 2022, noting his “extensive experience [in] handling significant litigation and regulatory

issues.” Chris was also recognized as a 2021 “Sports, Gaming & Entertainment Trailblazer” by *The National Law Journal*, which recognizes sports and entertainment lawyers who have had the greatest impact in these industries.

Chris received the *Law360* Distinguished Legal Writing Award at the 2019 Burton Awards. The Burton Awards, held in association with the Library of Congress and sponsored by *Law360* and the American Bar Association, honor the finest accomplishments in law, including writing, legal reform, public service and public interest, regulatory innovations and lifetime achievements in the profession.

Chris has also been recognized for his dedication to gun violence prevention. He was named a 2022 “Northeast Trailblazer” by *The American Lawyer* in connection with the historic \$73 million settlement on behalf of the Sandy Hook families against Remington Arms, for which he was also featured in the Reuters “Pro Bono Heroes” column. Chris and the firm have further been honored by the Brady Center with its Legal Advocate Award and the Law Center to Prevent Gun Violence with its Richard W. Odgers Pro Bono Partner Award.

Tiana Voegelin, Partner (Tvoegelin@paulweiss.com)

A partner in the Litigation Department, Tiana Voegelin specializes in complex commercial and civil litigation, internal investigations and trial practice. Tiana represents clients in a broad range of complex commercial disputes, with a particular focus on litigation involving the sports industry, mergers & acquisitions, and highly sensitive internal investigations. Tiana has extensive experience litigating in state and federal courts, in all phases of litigation, from pre-suit investigations through trial and appeal. Tiana has been recognized as a Rising Star by *The Legal 500* for general commercial disputes.

EXPERIENCE

Tiana has achieved numerous exceptional results on behalf of her clients. Among others, her recent achievements include representations of:

- The **independent directors of former CBS Corp.** in successfully resolving multibillion-dollar securities class and derivative actions brought in the Delaware Court of Chancery alleging breach of fiduciary duty and inadequate disclosure claims, among others, relating to CBS Corp.'s multibillion-dollar stock-for-stock merger with Viacom Inc.
- The **National Football League** in various high profile matters, including:
 - an appellate victory in a lawsuit brought by a former NFL coach seeking to hold the League liable for the termination of his employment contract, compelling him to arbitrate his claims; and
 - the litigation and settlement of a lawsuit brought by two former NFL players alleging that a term in the judicially approved NFL Concussion Settlement Agreement constituted unlawful discrimination under federal law;
 - the ongoing implementation of the NFL Concussion Settlement and related Third Circuit appeals.
- **Fédération Internationale de Football Association (FIFA)** in various matters, including the successful settlement of a dispute alleging that the U.S. Soccer Federation engaged in anticompetitive behavior by refusing to grant sports promoter Relevant Sports permission to organize a professional football game between two non-U.S. teams in the United States.
- A **Special Committee of the Board of Directors of Credit Suisse Group AG** in an investigation and widely anticipated report on the Bank's relationship with Archegos Capital Management following the fund's default and Credit Suisse's related losses.

- The **former special committee members of Cornerstone Building Brands** in the pending settlement of shareholder litigation in the Delaware Court of Chancery challenging the fairness of, and sufficiency of disclosures relating to, a take-private transaction, in which Cornerstone's majority shareholder, Clayton, Dubliner & Rice, acquired the remaining outstanding shares of Cornerstone.
- **Atos SE** in the successful settlement and dismissal, with prejudice, of a lawsuit brought by Unisys Corp. alleging misappropriation of trade secrets.
- **Citigroup** in connection with a months-long trial and the ultimate settlement of claims relating to the Lehman Brothers' bankruptcy.
- Other institutions in connection with various highly sensitive internal investigations, including a **multinational investment bank** and **major technology company**.

Yoav Gaffney, Associate (ygaffnev@paulweiss.com):



An associate in the Litigation Department, Yoav Gaffney has represented clients in high-stakes civil litigation and complex regulatory investigations spanning a variety of substantive areas, including complex commercial litigation, sports, financial services litigation, antitrust and securities. Yoav received his J.D., with high honors, from the George Washington University School of Law.

Tian Lei, Associate (tlei@paulweiss.com):



An associate in the Litigation Department, Tian Lei has represented clients in high-stakes civil litigation and complex regulatory investigations spanning a variety of substantive areas, including complex commercial litigation, sports, employment, antitrust and securities. Tian received her J.D. from the New York University School of Law, where she was staff editor for the Moot Court Board and was awarded Best Oralist in the New York City Bar Association's 71st Annual Moot Court Competition.

EXHIBIT C

Antitrust

- Learn More
 - Our Practice
 - Recognition
 - Representative Engagements
 - Civil Litigation
 - Merger Clearance
 - Cartel Defense
 - Our Team
 - Related Practices
 - Litigation
 - Mergers & Acquisitions
 - Mergers & Acquisitions Litigation
 - White Collar & Regulatory Defense
 - Resources

Recognition | | | |

The Paul, Weiss Antitrust Practice advises clients on a full range of global antitrust matters, including antitrust regulatory clearance, government investigations, private litigation, and counseling and compliance. The firm represents clients before antitrust and competition authorities in the United States, the European Union, the United Kingdom and other jurisdictions around the world.

Recognition

Our Antitrust Group has earned an enviable reputation for its valued work. Recent acknowledgements have included:

Benchmark Litigation 2025

- Antitrust (USA) – Tier 1
- Eight Attorneys recognized as "Litigation Stars"
- Three Attorneys recognized as a "Top 100 Trial Lawyer"
- Five Attorneys recognized as a "Future Star"

Chambers USA 2024

- Antitrust (USA) – Band 2
- Antitrust (NY) – Band 1
 - One Eminent Practitioner Attorney
 - One Band 1 Attorney
 - One Band 2 Attorney
 - One Band 5 Attorney
 - One "Up and Coming" Attorney
- Antitrust (DC) – Band 3
 - One Band 1 Attorney

One Band 3 Attorney

Antitrust (DC): Litigation Specialists

Two Band 1 Attorneys

One Band 2 Attorney

One Band 5 Attorney

Antitrust: Cartel (USA) – Band 3

One Band 2 Attorney

Antitrust: Plaintiff (USA) – Band 2

One Band 1 Attorney

Antitrust (CA)

One Band 5 Attorney

Chambers Global 2024

Antitrust: Cartel (USA) – Band 3

One Band 2 Attorney

Competition/Antitrust (USA) – Band 3

One Band 2 Attorney

Chambers Europe 2025

Competition Law (UK)

One Band 1 Attorney

Chambers UK 2025

Competition Law (London)

One Band 1 Attorney

The Legal 500 US 2024

Antitrust: Civil litigation/Class Actions: Defense – Tier 1

Two Leading Lawyers and Six Recommended Lawyers

Antitrust: Civil Litigation/Class Actions: Plaintiff

One Hall of Fame Lawyer

Antitrust: Cartel – Tier 2

Five Recommended Lawyers and One Next Generation Lawyer

Antitrust: Merger Control – Tier 2

Two Leading Lawyers, 11 Recommended Lawyers and One Next Generation Lawyer

U.S. News - Best Lawyers "Best Law Firms" 2025

Antitrust Law – Tier 1 (USA, NY & DC)

Litigation: Antitrust – Tier 1 (USA & NY)

The National Law Journal 2024

DC Litigation Department of the Year (Antitrust)

Global Competition Review 2024

Antitrust (DC, NY & UK)

Highly Recommended

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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EXHIBIT D

Sports

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Paul, Weiss is one of the nation’s leading firms for the sports industry’s highest-stakes legal matters, from transformational multibillion-dollar acquisitions of professional franchises, to landmark disputes involving player health and safety issues and reputation-threatening investigations.

Recognition

Our Sports Group has been consistently commended for its work.

Chambers USA: Ranked as a leading firm in Sports Law.

The Legal 500: Ranked as a Top Tier Firm, with lawyers being recognized in the “Next Generation,” “Leading Lawyers” and “Hall of Fame” categories every year since 2017.

Law360: Named “Sports and Betting Group of the Year,” with lawyers being recognized as “MVP” and “Rising Star.”

The National Law Journal: Recognized two lawyers as a “Sports, Gaming & Entertainment Trailblazer.”

Paul, Weiss, Rifkind, Wharton & Garrison LLP

CONNECT WITH PAUL, WEISS



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PUERTO RICO SOCCER LEAGUE NFP
CORP., a Puerto Rico for profit corporation,
JOSEPH MARC SERRALTA IVES, MARIA
LARRACUENTE, JOSE R. OLMO-
RODRIGUEZ, and FUTBOL BORICUA
(FBNET), Inc.,

Plaintiff,

v.

FÉDÉRATION PUERTORRIQUENA DE
FUTBOL, INC., IVAN RIVERA-GUTIERREZ,
JOSE “CUKITO” MARTINEZ, GABRIEL
ORTIZ, LUIS MOZO CANETE, JOHN DOE 1-
18, INSURANCE COMPANIES A, B, C,
FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION (“FIFA”), and
CONFEDERATION OF NORTH, CENTRAL
AMERICA AND CARIBBEAN ASSOCIATION
FOOTBALL (“CONCACAF”),

Defendants.

CIVIL ACTION NO. 23-1203-
RAM

**DECLARATION OF ROBERTO A. CÁMARA-FUERTEES IN SUPPORT OF
FIFA’S APPLICATION FOR ATTORNEYS’ FEES**

I, Roberto A. Cámara-Fuertes, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a capital member with the law firm of Ferraiuoli LLC (“Ferraiuoli”) and am counsel of record for Defendant Fédération Internationale de Football Association (“FIFA”), in the above-captioned case. I am a member of the state bar of the Commonwealth of Puerto Rico and admitted in the District Court for the District of Puerto Rico.

2. I submit this declaration in support of FIFA's Application for Attorneys' Fees being submitted in compliance with this Court's Opinion and Order on Plaintiffs' Memorandum in Compliance, ECF No. 206. I have first-hand knowledge of the facts stated herein or have been advised of the facts as stated herein by others working on this matter with me, who have analyzed our billing records and invoices at my request. I could and would testify competently thereto if called as a witness.

3. Upon review of Plaintiffs' opposition briefs submitted on March 9, 2025, ECF Nos. 174–176, and supplemental opposition brief submitted on March 13, 2025, ECF No. 177, (the "Sanctioned Briefs"), Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul Weiss") determined that Plaintiffs' submissions appeared to include inaccurate citations, quotations, and non-existent cases. In coordination with the Paul, Weiss team, Ferraiuoli conducted a thorough review of Plaintiffs' submissions to assess the scope of the citation deficiencies. Once the breadth of Plaintiffs' citation defects became evident, Ferraiuoli reviewed the proposed replies and provided strategic guidance on presenting these critical issues to the Court, including specific recommendations for next steps in compliance with the applicable local rules and procedural requirements.

4. Following Plaintiffs' submission of a Memorandum Showing Cause Why Sanctions Should Not Be Levied, ECF No. 190, and accompanying exhibits, Ferraiuoli provided strategic advice and conducted a thorough review of the submission to ensure that the issues were properly and effectively presented to the Court.

5. The work performed in connection with the Sanctioned Briefs included reviewing the Sanctioned Briefs and citations contained therein, reviewing and revision of defendants' proposed replies; coordination of filing logistics; and advising on

related issues concerning sanctions proceedings and disqualification of pro hac vice admitted counsel.

6. Ferraiuoli issues FIFA monthly invoices for services rendered in this matter. Each Ferraiuoli attorney's time is recorded in fifteen-minute increments for inclusion in the monthly invoices submitted to FIFA.

7. Attached as **Exhibit A** is a true and correct copy of Ferraiuoli's time entries relating to Plaintiffs' four (4) motions filed at ECF Nos. 174–177 from March 9, 2025 through March 28, 2025.

8. The time entries in the attached **Exhibit A** do not include any work performed by Ferraiuoli in relation to any other aspect of this matter other than the Sanctioned Briefs, or in relation to any other matter.

9. As the Chair of the Litigation Department of one of the top-three-largest firms in Puerto Rico, I have first-hand knowledge of the rates of comparable firms and attorneys in the Puerto Rico market. I believe that the proposed blended hourly rate set forth in this declaration—which is lower than the rates agreed upon with FIFA—are reasonable for the services rendered, competitive within the broader legal market, and appropriately reflect the experience, expertise, and skill of the attorneys identified below.

Attorney	Position	Years of Experience	Proposed Hourly Rate	Hours Spent
Roberto A. Cámara-Fuertes	Capital Member	25	██████	████
Suleicka Tulier-Vázquez	Member	9	██████	████

10. Ms. Suleicka Tulier-Vázquez and I have collaborated on numerous high-profile antitrust matters and are among the firm's leading practitioners entrusted with handling complex antitrust litigation.

11. The law firm biographies detailing the credentials and experience of the attorneys listed above, and of Ferraiuoli, are attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 1, 2025.
San Juan, Puerto Rico

/s/ Roberto A. Cámara-Fuertes
Roberto A. Cámara-Fuertes
USDC-PR No. 219002

EXHIBIT A
FILED UNDER SEAL

EXHIBIT B

Roberto A. Cámara-Fuertes, Chair (rcamara@ferraiuoli.com)

Roberto is a Capital Member of the firm and the Chair of its Litigation Department.

Roberto is a trial attorney in the areas of products liability, aviation, First Amendment, media law, personal injury, warranty, banking, eviction, antitrust, eminent domain, construction and commercial matters in both the federal and Commonwealth courts of Puerto Rico, as well as the United States Court of Appeals for the First Circuit. In addition, Roberto has over twenty published opinions from the over one hundred cases he has litigated in the United States District Court of Puerto Rico Court or the United States Court of Appeals for the First Circuit in multiple areas of practice. Specifically, Roberto has handled numerous defamation claims against two of Puerto Rico's major newspapers and has participated in two of the most important antitrust cases filed in the last ten years. Additionally, several of Roberto's published opinions were rendered in aviation cases while defending most of the major air carriers in the United States. In the Product Liability field, Roberto has defended several Fortune 500 manufacturers, both in federal and local courts, of design, manufacture and failure to warn claims.

Roberto is a volunteer member of the Alumni School Committee Program for Yale University and conducts local interviews for potential candidates to the Yale College class. Prior to joining Ferraiouli, LLC in 2015, he was a Shareholder in one of Puerto Rico's largest and oldest law firms.

Representative Cases of Transactions

- *Meta Med LLC, et al. v. Insulet Corporation, et al.*, Civil No. 23-1546 (CVR), 2024 WL 1763610 (D.P.R. Apr. 23, 2024)
- *Oto Analytics LLC v. Benworth Capital Partners PR LLC, et al.*, Civil No. 23-1034 (GMM), 2023 WL 6690457 (D.P.R. Oct. 12, 2023)
- *Sánchez-Rodríguez v. American Airlines, Inc.*, Civil No. 21-1021 (PAD), 2022 WL 845592 (D.P.R. March 22, 2022)
- *Bautista REO PR, Corp., et al. v. Ájili Mójili, Inc., et al.*, Case No. CC-2017-0789, (P.R., Judgment of Oct. 29, 2021)
- *Gazelle v. MR 314 Fortaleza LLC*, Civil No. 16-2500 (GAG) (obtained jury verdict in favor of the Defendant, judgment dismissing the case with prejudice, and secured attorney's fees award)
- *Clifford A. Zucker v. Rolando Rodríguez, et al as Receiver of R-G Premier Bank of Puerto Rico*, United States Court of Appeals (Civil No.17-1749) (1st Cir. 2019) <http://media.ca1.uscourts.gov/pdf/opinions/17-1749P-01A.pdf>

- *LSREF2 Island Holding, Ltd., Inc. v. Ashford R.J.F. Inc. et al*, Supreme Court of Puerto Rico, March 7, 2019 (Civil No. CC-2017-492) <http://www.ramajudicial.pr/ts/2019/2019tspr42.pdf>
- *Angela M. Marcelino Guzmán v. LSREF2 Island Holding, Ltd., Inc.*, Court of First Instance, March 12, 2018 (Civil No. SJ2017CV01385)
- *LSREF2 Island Holding, Ltd., Inc. v. Miguel Angel, Rivera Rosario, et al*, Court of Appeals, March 28, 2018 (Civil No. KLCE2017-01743)
- *Leonhardt v. Aerostar Airport Holdings LLC*, Civil No. 17-1387 (GAG), 2018 WL 741675 (D.P.R. February 7, 2018)
- *Burckhart Search Group, Inc. v. D.F.C.*, 2013 WL 210266 (Attorneys' fees and costs)
- *Deutsche Bank v. D.F.C.*, 841 F.Supp.2d 593 (2012) (Banking)
- *Maceira-López v. Doral Financial Corp.*, 2012 WL 5986549 (Banking)
- *Méndez Internet Mgmt. Servs. v. Bankers Ass'n of P.R.*, 2011 U.S. Dist. LEXIS 10743(Antitrust, RICO)
- *Sterling Merch., Inc. v. Nestlé, S.A.*, 656 F.3d 112 (1st Cir. 2011)(Antitrust)
- *Burckhart Search Group, Inc. v. Doral Financial Corporation*, 2011 U.S. Dist. Lexis 138720(Banking, Torts, Civil Rights)
- *Fedelich v. Am. Airlines*, 724 F. Supp. 2d 274 (D.P.R. 2010)(Aviation, Product Liability)
- *Sterling Merch., Inc. v. Nestle, S.A.*, 724 F. Supp. 2d 245 (D.P.R. 2010)(Antitrust)
- *Bocanegra-Acevedo v. Toyota Motor Sales USA, Inc.*, 2009 U.S. Dist. LEXIS 34455(Product Liability)
- *Morel v. Daimler Chrysler AG*, 557 F. Supp. 2d 240 (D.P.R. 2008)(Product Liability)
- *González v. Executive Airlines, Inc.*, 236 F.R.D. 73 (D.P.R., 2006)(Aviation, Expert Evidence)
- *García-Ramos v. Transmeridian Airlines, Inc.*, 385 F. Supp 137 (D.P.R. 2005)(Aviation)
- *Ramallo Bros. Printing v. El Día, Inc.*, 392 F. Supp. 2d 118 (D.P.R. 2005)(Antitrust)

- *Vázquez-Santos v. El Mundo Broad. Corp.*, 283 F. Supp. 2d 561 (D.P.R. 2003)(First Amendment)

Suleicka Tulier-Vásquez, Member (stulier@ferraiuoli.com)



Suleicka Tulier-Vásquez is a Member Attorney with the Bankruptcy & Creditors' Rights and Commercial Litigation Practice Groups. She holds a Bachelor of Science Degree in Biomedical Sciences with minors in both Chemistry and Psychology, and a Juris Doctor from the University of Puerto Rico, School of Law. Previously, she was the General Manager for the Parent Company of various local restaurant corporations, responsible for talent acquisition, revenue management, and corporate expansion.

Suleicka began her legal career as a paralegal in the Litigation and Bankruptcy and Creditor's Rights Departments of another San Juan Law Firm while still a student, concentrating her efforts on complex matters and Adversary Proceedings. There, Suleicka was responsible for the drafting and preparation of, among others, pleadings, dispositive motions, proposed judgments, and post-judgment motions for both state and federal courts.

As a student practitioner at the University of Puerto Rico, Suleicka served in the Intellectual Property and Entrepreneurship Legal Aid Clinic and served as a Student Law Clerk for Chief Judge Aida Delgado Colón in the United States District Court for the District of Puerto Rico.

Representative Cases or Transactions

- *LSREF2 Island Holding, Ltd., Inc. v. Ashford R.J.F. Inc. et al*, Supreme Court of Puerto Rico, March 7, 2019 (Civil No. CC-2017-492) <http://www.ramajudicial.pr/ts/2019/2019tspr42.pdf>