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

Puerto Rico Soccer league NFP Corp., Joseph Marc Serralta Ives, Maria Larracuente, Jose R. Olmo-Rodriguez, and Futbol Boricua (FBNET), Inc.,

Plaintiffs,

v.

Federación Puertorriqueña de Futbol, Inc., Iván Rivera-Gutierrez, José "Cukito" Martinez, Gabriel Ortiz, Luis Mozo Cañete, Fédération Internationale de Football Association (FIFA), and Confederation of North, Central America and Caribbean Association Football (CONCACAF,

Defendants.

CIVIL ACTION NO. 23-1203 (RAM)

### MOTION FOR RECONSIDERATION OF SANCTIONS

#### TO THE HONORABLE COURT:

COME NOW Plaintiffs Puerto Rico Soccer League NFP Corp. ("PRSL"), Joseph Marc Serralta Ives, Maria Larracuente, José R. Olmo-Rodríguez, and Futbol Boricua (FBNET), Inc. (collectively, "Plaintiffs"), by and through their undersigned counsel, and respectfully, state, allege and pray, as follows.

The Honorable Court imposed sanctions on plaintiffs' counsels, in relation to docket entries #174, 175, 176, and 177. Counsel Ibrahim Reyes, without the assistance of counsel José R. Olmo-Rodríguez, prepared those documents. Counsel Olmo filed them without making any changes to them. Counsel Reyes takes full responsibility for the sanctions imposed by the Honorable Chief Judge Raul Arias-Marxuach, in relation to those documents, as stated in the attached statement.

WHEREFORE, Plaintiffs request that the Honorable Court reconsider the order to make it applicable only to counsel Reyes and not to counsel Olmo.

Respectfully submitted, in San Juan, Puerto Rico, this 22<sup>nd</sup> day of April, 2025.

/s/ José R. Olmo-Rodríguez José R. Olmo-Rodríguez USDC PR 213405 261 Ave. Domenech, SJ PR 00918 787.758.3570/jrolmo1@gmail.com

/s/ *Ibrahim Reyes* Ibrahim Reyes Gándara Florida Bar No. 581798 REYES LAWYERS, P.A. 236 Valencia Avenue Coral Gables, FL 33134 Tel. 305-445-0011 Fax. 305-445-1181 Email: ireyes@reyeslawyers.com Admitted pro hac vice

Counsel for the Plaintiffs

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed this document with the Clerk of Court using CM/ECF/PACER, which will send a notice of such filing to all attorneys of record in this case.

> /s/ Jose R. Olmo-Rodríguez José R. Olmo-Rodríguez, Esquire

/s/ Ibrahim Reyes Ibrahim Reyes, Esquire

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Puerto Rico Soccer League NFP Corp., et al.,  Plaintiffs,	CIVIL ACTION NO. 23-1203(RAM)
v.	
Federación Puertorriqueña de Futbol, Inc., et	
al.,	
Defendants.	

# STATEMENT UNDER PENALTY OF PERJURY

I hereby assert that I drafted the docket entries #174, 175, 176, and 177, without the assistance of José R. Olmo-Rodríguez ("Mr. Olmo") and that Mr. Olmo filed them without making any changes to them. I take full responsibility for the sanctions imposed by the Honorable Chief Judge Raul Arias-Marxuach, in relation to those documents.

I. Ibrahim Reves Gandara, of legal age, and resident of Florida, declare under penalty of perjury pursuant to 28 USC Sec. 1746 that the aforementioned answers are true and correct to the best of my knowledge.

Executed in Coral Gables, Florida, this 21st day of April. 2025.