

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-983

HAVANA DOCKS CORPORATION, PETITIONER

v.

ROYAL CARIBBEAN CRUISES, LTD., ET AL.

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

MOTION OF THE UNITED STATES FOR LEAVE TO
PARTICIPATE IN ORAL ARGUMENT AS AMICUS CURIAE
AND FOR DIVIDED ARGUMENT

Pursuant to Rules 21, 28.4, and 28.7 of the Rules of this Court, the Solicitor General, on behalf of the United States, respectfully moves for leave to participate in the oral argument in this case as amicus curiae and requests that the United States be allowed ten minutes of argument time. Petitioner has agreed to cede ten minutes of argument time to the United States and consents to this motion.

This case concerns the proper interpretation of Title III of the Cuban Liberty and Democratic Solidarity Act of 1996, 22 U.S.C. 6021 et seq., which creates a cause of action for "any United

States national who owns the claim" to property confiscated by the Cuban regime, allowing such a national to seek damages from "any person" who "traffics in" the confiscated property. 22 U.S.C. 6082(a)(1)(A). The court of appeals held that Title III's cause of action is limited to property in which the plaintiff would have had an interest at the time of trafficking had the expropriation not occurred. Under that holding, U.S. nationals who hold claims based on time-limited property interests that Title III expressly protects are nonetheless unable to sue those who trafficked in the relevant property.

The United States has a substantial interest in this case, because it has a significant foreign-policy interest in ensuring that Title III remains an effective mechanism to allow victims of Cuban expropriation to obtain redress and to deter private actors from collaborating with the Cuban regime to exploit expropriated property. See Press Statement, Marco Rubio, Sec'y of State, Restoring a Tough U.S.-Cuba Policy (Jan. 31, 2025), <https://perma.cc/HL77-66QC>. At the Court's invitation, the United States filed an amicus brief in this case at the petition stage.

The United States has previously presented oral argument as amicus curiae in cases in which the interpretation of federal statutes implicated its foreign-policy interests. See, e.g., Republic of Hungary v. Simon, 604 U.S. 115 (2025); Nestlé USA, Inc. v. Doe, 593 U.S. 628 (2021); Federal Republic of Germany v. Philipp, 592 U.S. 169 (2021); WesternGeco LLC v. ION Geophysical

Corp., 585 U.S. 407 (2018); Jesner v. Arab Bank, PLC, 584 U.S. 241 (2018). The United States' participation in oral argument in this case could therefore materially assist the Court.

Respectfully submitted.

D. JOHN SAUER
Solicitor General
Counsel of Record

DECEMBER 2025