

**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, JUAN M. CORNEJO,
MARIA LARRACUENTE, JOSE R. OLMO-
RODRIGUEZ, 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

**DEFENDANTS’ URGENT JOINT MOTION
TO RESCHEDULE SETTLEMENT CONFERENCE**

TO THE HONORABLE COURT:

COME NOW Federación Puertorriqueña de Fútbol, Inc., Iván Rivera-Gutierrez, José “Cukito” Martínez, Gabriel Ortiz, Luis Mozo Cañete (together with the foregoing, “FPF Defendants”), Fédération Internationale de Football Association (“FIFA”), and Confederation of North, Central America and Caribbean Association Football (“CONCACAF”), (together, “Defendants”), through their undersigned counsel, and for the reasons set forth below, hereby respectfully request that the order setting a settlement conference for next Tuesday, March 25, 2025, be vacated and that the conference be rescheduled.

1. On February 13, 2025, the parties jointly informed the Court that they were willing to participate in settlement negotiations (Dkt. No. 155).

2. The following day, the Honorable Court entered an order referring the case “to a U.S. Magistrate Judge for a settlement conference to be held during the month of March 2025.” (Dkt. No. 156).

3. The case was ultimately assigned to the U.S. Magistrate Judge Marshal D. Morgan, who on February 14, 2025, entered an order stating, among other things, that “[a] Settlement Conference is hereby set for 3/25/2025 at 9:30 AM.” (Dkt. No.160).

4. In the meantime, on March 6, 2025, Defendants filed three joint motions: (a) *Joint Motion to Disqualify Plaintiffs’ Counsel and Memorandum of Law in Support Thereof* (Dkt. No. 164; “Joint Motion to Disqualify”); (b) *Joint Motion for Protective Order Limiting the Scope of Discovery* (Dkt. No. 168); and (c) *Joint Motion for Protective Order and Rule 502(d) Order and Memorandum in Support Thereof* (Dkt. No. 169).

5. The following day, the Court entered an order holding in abeyance all three motions, and directed “Plaintiffs [to] respond to [them] on or before March 21, 2025.” (Dkt. No. 173).

6. Two days later, on March 9, 2025, Plaintiffs filed their oppositions to all three motions: (a) *Response in Opposition to Defendants’ Joint Motion to Disqualify Plaintiffs’ Counsel* (Dkt. No. 174); (b) *Plaintiffs’ Response in Opposition to Defendants’ Joint Motion for Protective Order Limiting the Scope of Discovery* (Dkt. No. 175); and (c) *Plaintiffs’ Response in Opposition to Defendants’ Joint Motion for Entry of a Protective and Confidentiality Order and Rule 502(D) Order* (Dkt. No. 176). And four days after that, on March 13, Plaintiffs filed an additional document entitled *Plaintiffs’ Supplement to Response in Opposition to Defendants’*

Joint Motion for Entry of a Protective and Confidentiality Order and Rule 502(D) Order (Dkt. No. 177).

7. On March 17, 2025, Defendants filed jointly three motions for leave to file replies to each of the three oppositions. These were, specifically: (a) *Motion for Leave to File Reply to Response, Dkt. No. 174* (Dkt. No. 178); (b) *Defendants' Motion for Leave to File Reply in Support of Their Motion for Entry of a Protective and Confidentiality Order and Rule 502(d) Order* (Dkt. No. 179); and (c) *Defendants' Motion for Leave to File Reply in Further Support of Their Motion for Protective Order Limiting the Scope of Discovery* (Dkt. No. 180).

8. All three motions for leave also tendered the respective replies as attachments so that they could be entered on the docket if the Court were to grant leave for them to be filed. *Id.* The replies noted, *inter alia*, that Plaintiffs appeared to have used generative artificial intelligence and cited non-existent and/or erroneous authorities in all three of their oppositions (Dkt. Nos. 183 at 1–3, 184 at 2–7, 185 at 2–4).

9. On March 18, 2025, the Court granted leave to file the reply motions into the record (Dkt No. 182).

10. On that same date Defendants filed: a) *Defendants' Joint Reply in Support of their Motion for Entry of a Protective and Confidentiality Order and Rule 502(d) Order* (Dkt No. 183); b) *Defendants' Reply in Support of their Joint Motion to Disqualify Plaintiffs' Counsel* (Dkt No. 184), and c) *Defendants Reply in Further Support of their Motion for Protective Order Limiting the Scope of Discovery* (Dkt No. 184).

11. Also on March 18, the Court ordered (as-amended on March 19) Plaintiffs to file a memorandum by March 25, 2025 showing cause as to why they should not be sanctioned for violations of the Model Rules of Professional Conduct and Federal Rule of Civil Procedure 11 in

connection with the issues Defendants identified, which the Court confirmed through independent review.

12. Defendants remain committed to discussing in good faith the possibility of a settlement in this case but, given the seriousness of the issues presented in these motions and the *Joint Motion to Disqualify* in particular, as well as in Plaintiffs' pending response to the Court's order to show cause, Defendants respectfully believe that it would not be fruitful, and indeed would be problematic to hold a settlement conference with Plaintiffs' counsel whose disqualification and potentially sanctioning will be pending.

13. Once the motion to disqualify, the sanctions order to show cause, and any other relief against Plaintiffs' counsel has been resolved, Defendants would be in a position to re-engage in settlement negotiations.

WHEREFORE, Defendants respectfully request that this Honorable Court vacate its previous order setting a settlement conference for Tuesday, March 25, 2025 (Dkt. No. 160), and hold in abeyance any new order scheduling of a new date for a settlement conference until after the Court has ruled on the *Joint Motion to Disqualify* and the order to show cause.

WE HEREBY CERTIFY that on this same date this Motion was submitted through the Court's CM-ECF system, which should automatically serve a copy on all counsel of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on this 20th day of March, 2025.

O'NEILL & BORGES LLC

By: /s/ Salvador J. Antonetti-Stutts
/s/ Aníbal A. Román-Medina

Salvador J. Antonetti-Stutts
USDC-PR No. 215002
Aníbal A. Román -Medina
USDC-PR No. 308410
250 Ave. Muñoz Rivera, Ste. 800
San Juan, P.R. 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944
Email: salvador.antonetti@oneillborges.com
anibal.roman@oneillborges.com

SIDLEY AUSTIN LLP

John J. Kuster (pro hac vice)
Jon Muenz (pro hac vice)
Amanda M. Blau (pro hac vice)
787 Seventh Avenue
New York, New York 10019
Tel: (212) 839-5300
Fax: (212) 839-5599
Email: jkuster@sidley.com
ablau@sidley.com
jmuenz@sidley.com

Attorneys for Defendant CONCACAF

ADSUAR MUÑIZ GOYCO

SEDA & PÉREZ-OCHOA, P.S.C.

P.O. Box 70294
San Juan, Puerto Rico 00936-8294
Tel: 787.756.9000 Fax: 787.756.9010

/s/Edwin Seda-Fernández

Edwin J. Seda-Fernández
USDC-PR No. 205212
Email: seda@amgprlaw.com

/s/Eric Pérez-Ochoa

Eric Pérez-Ochoa
USDC-PR No. 206314
Email: epo@amgprlaw.com

/s/Alexandra C. Casellas Cabrera

Alexandra Casellas Cabrera
USDC-PR No. 301010
Email: acasellas@amgprlaw.com

/s/Andrés Daniel Santiago López

Andrés D. Santiago-López
USDC-PR No. 309508
Email: asl@amgprlaw.com

Counsel for the FPF Defendants

FERRAIUOLI, LLC

By: /s/ Roberto A. Camara-Fuertes

Roberto A. Camara-Fuertes
USDC-PR No. 219002
Suleicka Tulier-Vazquez
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