

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

FIVE FOR  
ENTERTAINMENT S.A.,  
d/b/a FIVE LIVE  
ENTERTAINMENT and  
DIEGO HERNAN DE  
IRAOLA,

Plaintiffs,

v.

RAMON LUIS AYALA  
RODRIGUEZ a/k/a/ DADDY  
YANKEE, EL CARTEL  
RECORDS INC., ICARO  
SERVICES INC., and EDGAR  
BALDIRI MARTINEZ,

Defendants.

**CASE NO.: 11-CV-24142-  
Seitz/Simonton**

**EL CARTEL RECORDS,  
INC.'s ANSWER TO  
PLAINTIFFS'  
FIRST SET OF  
INTERROGATORIES IN  
AID OF EXECUTION**

**ANSWER TO INTERROGATORY**

Defendant hereby poses a general objection to all questions in the Interrogatory for the following reasons:

- a) The interrogatories are so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;
  - b) This discovery request seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the discovery of admissible evidence in violation of the collateral source rule. This request is also an invasion of defendants' right to privacy;
  - c) The information sought in this discovery request is equally available to the propounding party;
  - d) The interrogatory would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.
1. Please provide all of your contact information, including, for example, your name, home address, home telephone number, job designation, and email address.

**Ayeicha González**  
**Comptroller**  
**Tel. (787) 512 – 5355**  
**agc2006@gmail.com**  
**Calle 608**  
**Bloque 227 #14**  
**Villa Carolina, PR 00985**

2. Identify the amount of shares you have ever owned, directly or indirectly, of any domestic or foreign company within the past four years, the number of shares you currently own, directly or indirectly, the date that you sold any shares of stock within the past four years, the amount of money you received for such sale of shares of stock, and the name and contact information of any recipient of any transfers of such shares.

**Not applicable / None**

3. Identify all real property and vehicles owned or leased by you within the past four years, the current location and value of such property, any and all identifying documentation such as deeds or title, and to the extent any real property or vehicles have been transferred to another owner in the last four years, the contact information of the recipient and the value received by you for the transfer of such real property or vehicle.

**Not applicable / None**

4. Identify any and all checking, savings, passbook, certificate of deposit, or other bank or financial accounts held in your name, or accounts in any name over which you have or have had signatory authority or other such control, in the past five (5) years, the institution where such bank account is held, and the current balance in each such account.

1) Scotia Bank – Checking Account # [REDACTED] 3142,  
Current Balance: \$824,629.17.

2) Oriental Bank –

Checking Account # [REDACTED] 9698  
Current Balance: \$9,990.00

Savings Account # [REDACTED] 9698  
Current Balance: \$969,383.11

5. Identify all credit, debit and/or ATM cards which you use or as to which you have as to which you have signatory authority or other such control, wherever located and regardless of whose name appears on the account(s), in the past five (5) years.

**Not applicable / None**

6. Identify all domestic and/or foreign trusts in which you are or have been a settlor, trustee, trust protector, and/or beneficiary in the past five (5) years.

**Not applicable / None**

7. Identify all limited partnerships in which you have or have had an interest at any time in the past five (5) years.

**Not applicable / None**

8. Identify, and produce copies of, all journals, books, receipts, and any other documents reflecting, stating, identifying, and/or describing: (a) assets located in the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees; and (b) assets located outside the United States which you possess (or have possessed at any time over the

past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees.

**(a) Not applicable / None**

**(b) Not applicable / None**

**As for Intellectual Property assets, please review answer to Interrogatory #13.**

9. Provide a list of any person or entity that received any assets from you, in whatever title, valued at \$1,000 or more within the last four (4) years.

**Please review the attached documentation, which includes the Puerto Rico Tax Forms 480.6A or 480.6B for the years requested excluding 2014. The 2014 Forms 480.6 will be furnished in the upcoming weeks, as they are not yet due and are being prepared currently.**

10. Identify all entities and/or individuals from which you have received royalties or any other payments relating to Daddy Yankee's music (sale, broadcasting, etc.) within the past ten (10) years, and state the amount of that income.

**The interrogatories are so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant.**

**Also, the interrogatory is objected because it would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive:**

- 1) UMG – estimated income \$10,000,000**

**Contact information:**

**Mr. Mark Berger Esq.,**

**V.P. Business Affairs**

**Universal Music Latin Entertainment**

**5820 Canoga Ave, Suite #300**

**Woodland Hills, CA 91367**

**818-577-4794**

- 2) EMI - estimated income \$350,000**

**Contact information:**

**Mr. Mark Berger Esq.,**

**V.P. Business Affairs**

**Universal Music Latin Entertainment**

**5820 Canoga Ave, Suite #300**

**Woodland Hills, CA 91367**

**818-577-4794**

**3) iTunes - estimated income \$1,000,000**

**Contact information:**

**Apple Inc.  
1 Infinite Loop,  
Cupertino, California 95014  
<http://itunesconnect.apple.com/>**

**4) Digital Rights Agency- estimated income \$500,000**

**Contact information:**

**Digital Rights Agency  
Lizy Reiersen  
1539(a) Folsom Street  
San Francisco, California 94103  
415-864-1756  
586-283-6925 (FAX)**

**5) Orchard - estimated income \$350,000**

**Contact information:**

**Digital Rights Agency  
Lizy Reiersen  
1539(a) Folsom Street  
San Francisco, California 94103  
415-864-1756  
586-283-6925 (FAX)**

**6) Sound Xchange - estimated income \$650,000**

**Contact information:**

**SoundExchange, Inc.  
Account Services  
1121 14th St. N.W., Suite 700  
Washington, DC 20005  
202-640-5859 (FAX)**

**7) AdShare - estimated income \$100,000**

**Contact information:**

**GoDigital Records, LLC  
C/o Legal Dept.  
233 Wilshire Blvd, Ste 100  
Santa Monica, CA 90401**

**Fischbach, Perlstein, Lieberman & Almond  
C/o Robert Lieberman  
1875 Century Park East suite 1450  
Los Angeles, CA 90067**

**8) VEVO - estimated income \$150,000**

**Contact information:**

**C/o Alexander D. Kisch  
4 Times Square 25<sup>th</sup> Floor  
New York, NY 10036**

11. Identify all entities from which you have received royalties or other payments for the use of Daddy Yankee's image within the past ten (10) years, including, without limitation, advertising campaigns, television, film, radio, or in-person appearances, and the amount of those payments.

**The interrogatory is objected because it is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant.**

**Also, the interrogatory is objected because it would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive:**

**Western Union - \$ 100,000**

**Contact information:  
Corporate Headquarters  
P.O. Box 6036  
Englewood, CO 80112  
1-720-332-1000**

**METRO PCS - \$ 20,000**

**Contact information:  
2250 Lakeside Blvd.  
Richardson, TX 75082 USA  
1-214-570-5800  
info@metropcs.com**

**COORS - \$ 50,000**

**Contact information:  
250 South Wacker Drive  
Chicago, Il 60606-5888**

**CITGO - \$ 200,000**

**Contact information:  
P.O. Box 4689  
Houston, TX 77210-4689**

**1293 Eldridge Parkway  
Houston, TX 77077-1670  
1-800-992-4846  
info@CITGO.com**

**CBS Radio - \$ 50,000**

**Contact information:  
1271 Avenue of the Americas FL 44  
New York, NY 10020**

**212-649-9600**

**MTV- \$ 50,000**

**Contact information:**

**Viacom**

**1515 Broadway - 52nd Floor**

**New York, NY 10036**

**nonmanagementdirectors@viacom.com**

**SIRIUS XM - \$ 50,000**

**Contact information:**

**1221 Avenue of the Americas**

**New York, NY 10020**

**1-888-601-6296**

**Clear Channel - \$ 50,000**

**Contact information:**

**Tom Poleman,**

**32 Avenue of the Americas,**

**21st Floor,**

**New York, NY 10013**

**Tres Williams,**

**125 W. 55th St.,**

**11th Floor,**

**New York, NY 10019**

**iHeart Radio - \$ 75,000**

**Contact information:**

**Tom Poleman,**

**32 Avenue of the Americas,**

**21st Floor,**

**New York, NY 10013**

**Tres Williams,**

**125 W. 55th St.,**

**11th Floor,**

**New York, NY 10019**

**SBS Radio - \$ 150,000**

**Contact information:**

**Albert Rodriguez**

**Chief Operating Officer**

**Pablo Raúl Alarcón Media Center**

**7007 NW 77th Ave.**

**Medley, FL 33166**

**Telephone: (305) 644-4800**

**Fax: (786) 470-1667**

**CiFrut -**

**\$ 325,000**

**Contact information:  
EMBOTELLADOR ATIC S.A.  
Ave. de la Vega, n° 1,  
Building 2, 5th floor  
C.P. 28108  
Alcobendas (Madrid), Spain**

**Verizon**

**Contact information:  
140 West Street  
New York, NY 10007  
1-212-395-1000  
1-212-571-1897 (FAX)**

**Movistar Chile**

**Contact information:  
Telefónica Chile S.A.,  
Telefónica Móviles Chile S.A.,  
Providencia 111,  
Santiago, Chile.**

**Orbitz**

**Contact information:  
500 W Madison St Ste 1000  
Chicago, IL, 60661 United States  
(312) 894-5000  
<http://www.orbitz.com>**

12. Identify all entities from which you have received royalties or payments pertaining to sales of Daddy Yankee-branded items other than music within the past ten (10) years, including, without limitation, video games, cologne, footwear, and clothing, and the amount of those payments.

**Not applicable / None**

13. Identify all intellectual property currently owned by you, or that has been owned by you, in the last four years, directly or indirectly, and the current value of such property.

**(A) MASTER RECORDINGS (LP)**

- 1) “Barrio Fino en Directo” – Jointly owned with UMG**
- 2) “El Cartel Big Boss”**
- 3) “Prestige”**
- 4) “Mundial”**
- 5) “King Daddy”**

**(B) MUSIC VIDEOS**

- 1) “Barrio Fino en Directo” – Jointly owned with UMG**

- **Gangsta Zone**
- **Machucando**
- **Rompe**

**2) “El Cartel Big Boss”**

- **Impacto**
- **Mensaje de Estado**
- **El Jefe**
- **El Mejor de Todos los Tiempos**
- **Ella me levantó**

**3)“Prestige”**

- **Lovumba**
- **Limbo**
- **Pasarela**
- **La Noche de los Dos**
- **Ven Conmigo**
- **Perro Salvaje**
- **Llegamos a la Disco**

**4) “Mundial”**

- **La Despedida**
- **Descontrol**
- **Grito Mundial**

**5) “King Daddy”**

- **Palabras con Sentido**
- **Ora por mi**
- **La Nueva y La Ex**
- **La Rompe Carros**

**USPTO Trademark – “EL CONVOY”**

**I do not have the expertise or knowledge to indicate the current value of such property.**

14. Identify all contracts and/or agreements relating to intellectual property identified in response to the preceding question executed and/or entered into by you, directly or indirectly, within the past (5) years, stating the name, address and contact information of all parties involved in those contracts and/or agreements.

**The contact with UMG is Mr. Mark Berger Esq., Director of V.P. Business Affairs. Enclosed is the contract subscribed with this entity.**

**Confidential Settlement Agreement with Major League Baseball.**

**See answer to Interrogatory #10**

**Also, find enclosed contracts relevant to the question.**

15. Identify all “master” records owned by you, directly or indirectly, the current value of each master, and its location.

**See answer to Interrogatory #13.**



16. Identify all concerts or other events at which Daddy Yankee has performed in the past five (5) years, and state the amount you were paid for each event.

**Find enclosed list of concerts. Approximate payment for each oscillates in amount but is estimated at \$100,000 per show.**

17. Identify all concerts or other events at which Daddy Yankee is expected to perform within the next two (2) years, stating (i) the amounts you were paid and the balance owed for each event; and identifying (ii) the person/s who made payments and/or owe you payments for each event, and the account and institution where those payments were or are expected to be made.

**1) Date- February 13, 2015  
Place- Barranquilla, Colombia  
Producer- Cristian Cravitz Rodriguez d/b/a Cravitz Producciones  
Carr. 42 D # 83B60 Barranquilla, Colombia  
Amount- \$150,000**

**Currently there are no other scheduled concerts, all dates are tentative.**

18. State whether you are aware of any transfers of assets valued at \$5,000 or more made by any of the other Defendants in this action within the last three (3) years, and identify each such transfer.

**Based upon the information readily available, none.**

19. Identify any monies owed to you by any person, organization, or legal entity, and state the amount of the debt.

**The interrogatory is objected because it is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant.**

**I cannot specify or indicate the monies that will be owed, as many depend on statements that are yet to be received or tabulated.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive:**

**1) Itunes - \$ 1,500  
2) AdShare - \$ 10,000  
3) VEVO - \$ 8,000  
4) UNIVERSAL - \$ 25,000  
5) Digital Rights Agency - \$ 250**

**SWORN STATEMENT PURSUANT TO 28 U.S.C. §1746 (1)**

I, Ayeicha González, certify under penalty of perjury under the Laws of the United States of America that I have verified the above answers to interrogatories in the above captioned case; and that the foregoing, as well as the above answers, are true and correct to the best of my knowledge, information and belief.

Executed on February 6, 2015.

  
\_\_\_\_\_  
**Ayeicha González**

Dated: February 6, 2015

POLENBERG COOPER PA

Jon Polenberg, Esq.  
jpolenberg@polenbergcooper.com  
Jude Christopher Cooper, Esq.  
jcooper@polenbergcooper.com  
1351 Sawgrass Corporate Parkway  
Suite 101  
Fort Lauderdale, FL 33323  
Telephone: 954-742-9995  
Facsimile: 742-9971

PRADO NUNEZ & ASSOCIATES  
Edwin Prado, Esq. (pro hac vice)  
pradolaw10@gmail.com  
Del Parque St. 403, 8th Floor  
San Juan, PR 00912  
Telephone: (787) 977-1411

*Attorneys for Defendants El Cartel,  
Ramón Luis Ayala Rodríguez  
and Icaro Services Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 6, 2015, a true and correct copy of the foregoing was served to the parties listed below in the manner so stated.

**SERVICE LIST**

**Via E-mail**

**WINSTON & STRAWN LLP**

Eric W. Bloom (pro hac vice)  
Tomás Leonard (pro hac vice)  
Margaret Ciavarella (pro hac vice)  
1700 K Street N.W.  
Washington, D.C. 20006-3817  
Tel: (202) 282-5000  
Fax: (202) 282-5100  
ebloom@winston.com  
tleonard@winston.com  
mciavarella@winston.com

**ASSOULINE & BERLOWE, P.A.**

3250 Mary Street, Suite 100  
Miami, Florida 33133  
Telephone: (305) 567-5576  
Facsimile: (305) 567-9343

By: /s/Daniel E. Vielleville Peter E. Berlowe (FBN 143650)  
Daniel E. Vielleville (FBN 940496)

***Attorneys for Plaintiffs Five for Entertainment, S.A.,  
d/b/a Five Live Entertainment, and Diego Hernán de Iraola***

By: /s/ Edwin Prado Galarza  
Prado, Núñez & Asociados, P.S.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

FIVE FOR ENTERTAINMENT  
S.A., d/b/a FIVE LIVE  
ENTERTAINMENT and DIEGO  
HERNAN DE IRAOLA,

Plaintiffs,

v.

RAMON LUIS AYALA  
RODRIGUEZ a/k/a/ DADDY  
YANKEE, EL CARTEL  
RECORDS INC., ICARO  
SERVICES INC., and EDGAR  
BALDIRI MARTINEZ,

Defendants.

CASE NO.: 11-CV-24142-  
Seitz/Simonton

**RAMÓN LUIS AYALA  
RODRÍGUEZ's ANSWER TO  
PLAINTIFFS'  
FIRST SET OF  
INTERROGATORIES IN AID  
OF EXECUTION**

**ANSWER TO INTERROGATORY**

Defendant hereby poses a general objection to all questions in the Interrogatory for the following reasons:

- a) The interrogatories are so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;
  - b) This discovery request seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the discovery of admissible evidence in violation of the collateral source rule. This request is also an invasion of defendants' right to privacy;
  - c) The information sought in this discovery request is equally available to the propounding party;
  - d) The interrogatory would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.
1. Please provide all of your contact information, including, for example, your name, home address, home telephone number, job designation, and email address.

**Ramón Luis Ayala Rodríguez  
Recording Artist  
Calle Jaen #f3  
Urbanización Vista Mar Marina  
Carolina, PR, 00983**

2. Identify the amount of shares you have ever owned, directly or indirectly, of any domestic or foreign company within the past four years, the number of shares you currently own, directly or indirectly, the date that you sold any shares of stock within the past four years, the amount of money you received for such sale of shares of stock, and the name and contact information of any recipient of any transfers of such shares.

**All the shares I own are also part of the conjugal partnership with my wife Mireddys González. In fact, none of my assets are solely owned by me but rather are owned by said conjugal partnership.**

<b>El Cartel Records</b>	<b>100%</b>
<b>Los Cangris, Inc.</b>	<b>100%</b>
<b>DY Merchandising</b>	<b>70%</b>
<b>DY Broadcasting</b>	<b>70%</b>

**There have been no transfers of these shares.**

3. Identify all real property and vehicles owned or leased by you within the past four years, the current location and value of such property, any and all identifying documentation such as deeds or title, and to the extent any real property or vehicles have been transferred to another owner in the last four years, the contact information of the recipient and the value received by you for the transfer of such real property or vehicle.

**All the real estate I own is also part of the conjugal partnership with my wife Mireddys González. In fact, none of my assets are solely owned by me but rather are owned by said conjugal partnership.**

**Property located in Puerto Rico:**

- (1) Calle Jaen property specified in answer to Interrogatory #1
- (2) Cataño, Barrio Palmas – estimated value \$80,000
- (3) Residencial Villa Kennedy ED 5 Apt. 88 – estimated value \$10,000 (To be Provided)
- (4) Bosques del Río, Trujillo Alto – estimated value \$125,000
- (5) Summit Hill, Guaynabo – estimated value \$175,000 (To be Provided)
- (6) Urb. Carabalí, Luquillo (home and plot of land) – estimated value \$600,000
- (7) Urb. Country Club Calle Yaboa Real #874, San Juan – estimated value \$180,000 (To be Provided)
- (8) Quintas del Campeche, Calle Trinitaria 701, Carolina – estimated value \$200,000

**Property located in Florida:**

- (1) 2550 Davenport Circle, Kissimme, FL – estimated value \$100,000 (To be Provided)
- (2) 1717 North Bayshore Circle Apt. \_\_\_\_, Miami FL – estimated value \$300,000 (To be Provided)

**Find copy of the title for some of these properties attached. Please note, however, that Property Law in Puerto Rico is quite complex and some of the titles are not yet available due to restraints placed by the Puerto Rico Registry of Property, or by virtue of pending bureaucratic procedures. As soon as new titles become available we will promptly inform them**

4. State your Social Security number, and produce a copy of your Social Security card.

**SS # [REDACTED] 1643, see copy of card enclosed.**

5. Identify any and all checking, savings, passbook, certificate of deposit, or other bank or financial accounts held in your, your wife's and/or your children's name, or accounts in any name over which you have or have had signatory authority or other such control, in the past five (5) years, the institution where such bank account is held, and the current balance in each such account.

**(1) Scotia Bank – Checking Account # [REDACTED] 9178 (LOS CANGRIS's account) -- Current Balance: \$424,344.10.**

**(2) Scotia Bank – Checking Account # 409 – [REDACTED] 4049 (Personal account) Current Balance: \$175,893.15**

6. Identify all credit, debit and/or ATM cards which you use or as to which you have as to which you have signatory authority or other such control, wherever located and regardless of whose name appears on the account(s), in the past five (5) years.

**Scotia Bank Business VISA Card from Los Cangris Bank Account, card ending in # 0958 that expires 11/17. See copy enclosed.**

7. Identify all domestic and/or foreign trusts in which you are or have been a settlor, trustee, trust protector, and/or beneficiary in the past five (5) years.

**Not applicable / None**

8. Identify all limited partnerships in which you have or have had an interest at any time in the past five (5) years.

**Not applicable.**

9. Identify, and produce copies of, all journals, books, receipts, and any other documents reflecting, stating, identifying, and/or describing: (a) assets located in the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other 10 persons, entities, or nominees; and (b) assets located outside the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees.

**Assets owned by the Conjugal Partner**

- **Houses (5)**
- **Furniture and fixtures**
- **Jewelry**

10. Please state whether you have been employed in the last four years, including any consulting work or work which paid on a commission basis, and identify the name, address, telephone number and business purpose of any and all employer(s) or principles in the last four years. For any consulting work or commission-based work, identify the amount of income such work has generated.

**See Interrogatory Answer #11, El Cartel**

11. Provide a list of any person or entity that received any assets from you, in whatever title, valued at \$1,000 or more within the last four (4) years.

**The interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;**

**Otherwise refer to Answer to Interrogatory by El Cartel Records, Inc.**

12. Identify all entities and/or individuals from which you have received royalties or any other payments relating to your music (sale, broadcasting, etc.) within the past ten (10) years, and state the amount of that income.

**The interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;**

**Otherwise refer to Answer to Interrogatory #11 by El Cartel Records, Inc.**

13. Identify all entities from which you have received royalties or other payments for the use of your image within the past ten (10) years, including, without limitation, advertising campaigns, television, film, radio, or in-person appearances, and the amount of those payments.

**The interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;**

**Otherwise refer to Answer to Interrogatory #11 by El Cartel Records, Inc.**

**Los Cangris - \$ 1,000,000**

**El Cartel - \$ 600,000**

**ASCAP - \$ 4,000,000**

14. Identify all entities from which you have received royalties or payments pertaining to sales of Daddy Yankee-branded items other than music within the past ten (10) years, including, without limitation, video games, cologne, footwear, and clothing, and the amount of those payments.

**The interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;**

**Otherwise refer to Answer to Interrogatory by El Cartel Records, Inc.**

15. Identify all intellectual property currently owned by you or your spouse or any of your children, or that has been owned by you, your spouse or any of your children, in the last four years, directly or indirectly, and the current value of such property.

**Not applicable / None**

**Otherwise refer to Answer to Interrogatory by El Cartel Records, Inc.**

16. Identify all contracts and/or agreements relating to intellectual property identified in response to the preceding question executed and/or entered into by you, directly or indirectly, within the past (5) years, stating the name, address and contact information of all parties involved in those contracts and/or agreements.

**Not applicable / None**

**Otherwise refer to Answer to Interrogatory by El Cartel Records, Inc.**

17. Identify all "master" records owned by you, directly or indirectly, the current value of each master, and its location.

**None. Any "masters" available are located at:**

**Los Cangris Inc.  
#874 Calle Yaboa Real  
Urb. Country Club  
San Juan PR 00936**



**Otherwise refer to Answer to Interrogatory by El Cartel Records, Inc.**

18. Identify all concerts or other events at which you have performed in the past five (5) years, and state the amount you were paid for each event.

**Find enclosed list of concerts. Approximate payment for each oscillates in amount but is estimated at \$ 100,000 per show.**

19. Identify all concerts or other events at which you are expected to perform within the next two (2) years, stating (i) the amounts you were paid and the balance owed for each event; and identifying (ii) the person/s who made payments and/or owe you payments for each event, and the account and institution where those payments were or are expected to be made.

**1) Date- February 13, 2015  
Place- Barranquilla, Colombia  
Producer- Cristian Cravitz Rodriguez d/b/a Cravitz Producciones  
Carr. 42 D # 83B60 Barranquilla, Colombia  
Amount- \$150,000**

**Currently there are no other scheduled concerts, all dates are tentative.**

20. State whether you are aware of any transfers of assets valued at \$5,000 or more made by any of the other Defendants in this action within the last three (3) years, and identify each such transfer.

**See El Cartel Answer to Interrogatory #18.**

21. Identify any monies owed to you by any person, organization, or legal entity, and state the amount of the debt.

**The interrogatory is objected because it is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant.**

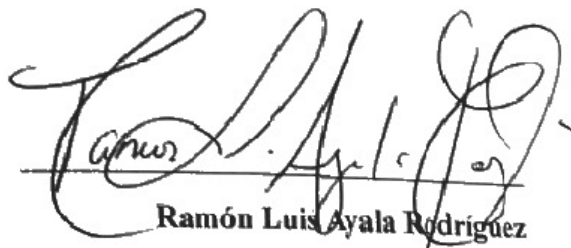
**I cannot specify or indicate the monies that will be owed, as many depend on statements that are yet to be received or tabulated.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive**

- 1) ASCAP – Approximately \$ 10,000  
2) HC Marketing - Approximately \$ 50,000**

I, Ramón Luis Ayala Rodríguez, certify under penalty of perjury under the Laws of the United States of America that I have verified the above answers to interrogatories in the above captioned case; and that the foregoing, as well as the above answers, are true and correct to the best of my knowledge, information and belief.

Executed on February 6, 2015.



Ramón Luis Ayala Rodríguez

Dated: February 6, 2015

POLENBERG COOPER PA  
Jon Polenberg, Esq.  
jpolenberg@polenbergcooper.com  
Jude Christopher Cooper, Esq.  
jcooper@polenbergcooper.com  
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PRADO NUNEZ & ASSOCIATES  
Edwin Prado, Esq. (pro hac vice)  
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Del Parque St. 403, 8th Floor  
San Juan, PR 00912  
Telephone: (787) 977-1411

*Attorneys for Defendants El Cartel,  
Ramón Luis Ayala Rodríguez  
and Icaro Services Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 6, 2015, a true and correct copy of the foregoing was served to the parties listed below in the manner so stated.

**SERVICE LIST**

**Via E-mail**

**WINSTON & STRAWN LLP**

Eric W. Bloom (pro hac vice)  
Tomás Leonard (pro hac vice)  
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tleonard@winston.com  
mciavarella@winston.com

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3250 Mary Street, Suite 100  
Miami, Florida 33133  
Telephone: (305) 567-5576  
Facsimile: (305) 567-9343

By: /s/Daniel E. Vielleville Peter E. Berlowe (FBN 143650)  
Daniel E. Vielleville (FBN 940496)

***Attorneys for Plaintiffs Five for Entertainment, S.A.,  
d/b/a Five Live Entertainment, and Diego Hernán de Iraola***

By: /s/ Edwin Prado Galarza  
Prado, Núñez & Asociados, P.S.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

FIVE FOR  
ENTERTAINMENT S.A.,  
d/b/a FIVE LIVE  
ENTERTAINMENT and  
DIEGO HERNAN DE  
IRAOLA,

Plaintiffs,

v.

RAMON LUIS AYALA  
RODRIGUEZ a/k/a/ DADDY  
YANKEE, EL CARTEL  
RECORDS INC., ICARO  
SERVICES INC., and EDGAR  
BALDIRI MARTINEZ,

Defendants.

CASE NO.: 11-CV-24142-  
Seitz/Simonton

ICARO SERVICES, INC.'s  
ANSWER TO PLAINTIFFS'  
FIRST SET OF  
INTERROGATORIES IN  
AID OF EXECUTION

ANSWER TO INTERROGATORY

Defendant hereby poses a general objection to all questions in the Interrogatory for the following reasons:

- a) The interrogatories are so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;
  - b) This discovery request seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the discovery of admissible evidence in violation of the collateral source rule. This request is also an invasion of defendants' right to privacy;
  - c) The information sought in this discovery request is equally available to the propounding party;
  - d) The interrogatory would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.
1. Please provide all of your contact information, including, for example, your name, home address, home telephone number, job designation, and email address.

EDGAR BALDIRIS MARTINEZ SILVA  
2481 EAGLE RUN DR.  
WESTON, FL 33327  
icaroservices@gmail.com

2. Identify the amount of shares you have ever owned, directly or indirectly, of any domestic or foreign company within the past four years, the number of shares you currently own, directly or indirectly, the date that you sold any shares of stock within the past four years, the amount of money you received for such sale of shares of stock, and the name and contact information of any recipient of any transfers of such shares.

**Not applicable / None**

3. Identify all real property and vehicles owned or leased by you within the past four years, the current location and value of such property, any and all identifying documentation such as deeds or title, and to the extent any real property or vehicles have been transferred to another owner in the last four years, the contact information of the recipient and the value received by you for the transfer of such real property or vehicle.

**The property located at 2481 Eagle Run Drive, Weston, Florida 33327 was originally owned by Icaro Services, Inc. as it was purchased in the year 2010. Subsequently, in the year 2011 it was transferred to the conjugal partnership comprised of Edgar Baldiri Martínez and Amanda Lopez.**

**Previous rentals:**

- (1) 1400 Sawgrass Corporate, Parkway, Sunrise FL 33316 (rental)
- (2) 2900 Glades Circle Suite, Suite 950, Weston FL 33327 (rental)

**Current rental:**

- (1) 2645 Executive Park, Weston FL 33327

**Vehicle:**

- (1) Infinity 2011 (sold approximately in 2013; last registration included)

**Office Equipment consisting of: Computer, Furniture & Fixtures, Cleaning Equipment were sold on year 2012 for \$2,000.**

4. Identify any and all checking, savings, passbook, certificate of deposit, or other bank or financial accounts held in your name, or accounts in any name over which you have or have had signatory authority or other such control, in the past five (5) years, the institution where such bank account is held, and the current balance in each such account.

**(1) Citibank- Weston Florida (embargoed accounts):**

**REDACTED 6008**  
**REDACTED 6226**

**(2) Bank of America- Weston Florida**

**#REDACTED 2035, Active**  
**Balance 359.49 May 1, 2014**  
**#REDACTED 6255, Active**  
**Balance: 238.00 @ July 30, 2014**  
**#REDACTED 6161, Active**  
**Balance 39.95 April 30, 2014**

**(3) Banco Popular, Sunrise Florida**

**REDACTED 4361, Closed**

**(4) Wells Fargo, FL**

**#REDACTED 2654**

5. Identify all credit, debit and/or ATM cards which you use or as to which you have you have signatory authority or other such control, wherever located and regardless of whose name appears on the account(s), in the past five (5) years.

Credit Card/Citibank Mastercard **REDACTED** 9802  
Debit Card/Citibank **REDACTED** 1496

6. Identify all domestic and/or foreign **trusts** in which you are or have been a settlor, trustee, trust protector, and/or beneficiary in the past five (5) years.

**Not applicable / None**

7. Identify all limited partnerships in which you have or have had an interest at any time in the past five (5) years.

**Not applicable / None**

8. Identify, and produce copies of, all journals, books, receipts, and any other documents reflecting, stating, identifying, and/or describing: (a) assets located in the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees; and (b) assets located outside the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees.

**(a) Infinity 2011 (copy of last registration included-sold approximately 2013)**  
**(b) Not applicable / None**

**As for Intellectual Property assets, please review answer to Interrogatory #10.**

9. Provide a list of any person or entity that received any assets from you, in whatever title, valued at \$1,000 or more within the last four (4) years.

**The interrogatory is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;**

**The interrogatory would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.**

**Finally, there are certain providers of services that are generic and customary in any line of business, such as janitorial services, accountants or legal services that ought not to be detailed as specified in the instruction, as given information is impertinent and unnecessary for the purposes of the interrogatory.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive:**

**(1) El Cartel Records f/s/o "Daddy Yankee" – various booking engagements**

**Please refer to Answer to Interrogatory by El Cartel Records, Inc. for specific information regarding this entity.**

**(2) Juan Fernando Velazco - various booking engagements**

**Javier Villaba  
gusound@me.com  
+539 999017801  
+593 980260229**

**Carlos Acosta  
carlosacosta@aretemusic.com  
+57 3115614706**

**(3) Luis Lozada f/s/o “Vico-C” - various booking engagements**

**Urbanización Estancias de San Fernando  
Calle 4 A-18  
Carolina, Puerto Rico 00985**

**(4) Andrea Ramírez – Icaro Services, Inc. employee**

**Contact information is not readily available lost all contact.**

**(5) Mi Artista Booking, Inc.**

**Pedro Santana  
Villas de Ciudad Jardin Buzon 9603  
Canovanas, PR 00729**

**(6) Carlos Crespo**

**Contact information is not readily available**

**(7) Richard De La Font Agency**

**4845 S Sheridan Rd,  
Ste 505, Tulsa, OK 74145  
<http://delafont.com/>  
(918) 665-6200**

**(8) AMNI Corporation**

**Contact information is not readily available**

**(9) Pina Records**

**PO Box 9406  
Caguas, PR 00726**

**(10) Jorge Martinez**

**84 Winthrop Dr.  
Sharbsburg GA 30277**

**(11) Edwin Prado**

**403 Calle Del Parque**



**San Juan PR 00912  
(12) Promovision Music Corp.**

**10770 NW 66 Street  
Suite 301,  
Doral, Florida 33178**

**(13) Angel Reyes**

**49 Urb. Pedregales  
Rio Grande, PR 00693**

**(14) Edgar Baldiri Martinez**

**2481 Eagle Run Dr.  
Weston, Florida 33327**

10. Identify all intellectual property currently owned by you or that has been owned by you in the last four years, directly or indirectly, and the current value of such property.

21.25% ownership over the movie "Nadie Sabe lo que Tiene" – find contract attached.

11. Identify all contracts and/or agreements relating to intellectual property identified in response to the preceding question executed and/or entered into by you, directly or indirectly, within the past (5) years, stating the name, address and contact information of all parties involved in those contracts and/or agreements.

**Please find enclosed contract relevant to the question.**

12. Identify all concerts or other events at which artists under your management are expected to perform within the next two (2) years, stating (i) the amounts you were paid and the balance owed for each event; and identifying (ii) the person/s who mad payments and/or owe you payments for each event, and the account and institution where those payments were or are expected to be made.

**I no longer participate in this sort of commercial activity and therefore I have no concerts scheduled.**

13. State whether you are aware of any **transfers of assets valued at \$5,000** or more made by any of the other Defendants in this action within the last three (3) years, and identify each such transfer.

**Based upon the information readily available, none.**

14. Identify any monies owed to you by any person, organization, or legal entity, and state the amount of the debt.

**The interrogatory is objected because it is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant.**

**I cannot specify or indicate the monies that will be owed, as many depend on statements that are yet to be received or tabulated.**

**Nonetheless, defendant proposes an estimated list that is neither all inclusive nor definitive:**

**(1) Re: Money owed for concerts in Colombia of Daddy Yankee and Fernando Velazco**

**Amount owed: \$165,000.00**

**Debtor and contact information -**

**Harrigson González Sánchez  
Total Conciertos SAS  
Av. Carrera 9° N° 107 A – 12, Piso 4  
Carrera 13 N° 96 – 67, Oficina 304  
Bogotá**

**(2) Re: Snoop Dog and friends concert in Medellín, Colombia**

**Amount owed: \$125,000.00**

**Debtor and contact information –**

**Mr. Kenyatta Poole and Mrs. Jomaris DeJesús  
4725 Hanstead Trace, Alpharetta, GA 30022**

**(3) Re: Breach of contractual obligations**

**Amount owed: \$516,955**

**Debtor and contact information –  
Diego Iraola, Plaintiff**

**SWORN STATEMENT PURSUANT TO 28 U.S.C. §1746 (1)**

I, Edgar Baldiri Martínez, certify under penalty of perjury under the Laws of the United States of America that I have verified the above answers to interrogatories in the above captioned case; and that the foregoing, as well as the above answers, are true and correct to the best of my knowledge, information and belief.

Executed on February 06, 2015.



---

**Edgar Baldiri Martínez**

Dated: February 6, 2015

POLENBERG COOPER PA

Jon Polenberg, Esq.  
jpolenberg@polenbergcooper.com  
Jude Christopher Cooper, Esq.  
jcooper@polenbergcooper.com  
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Facsimile: 742-9971

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Edwin Prado, Esq. (pro hac vice)  
pradolaw10@gmail.com  
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San Juan, PR 00912  
Telephone: (787) 977-1411

*Attorneys for Defendants El Cartel,  
Ramón Luis Ayala Rodríguez  
and Icaro Services Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 6, 2015, a true and correct copy of the foregoing was served to the parties listed below in the manner so stated.

**SERVICE LIST**

**Via E-mail**

**WINSTON & STRAWN LLP**

Eric W. Bloom (pro hac vice)  
Tomás Leonard (pro hac vice)  
Margaret Ciavarella (pro hac vice)  
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Washington, D.C. 20006-3817  
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Fax: (202) 282-5100  
ebloom@winston.com  
tleonard@winston.com  
mciavarella@winston.com

**ASSOULINE & BERLOWE, P.A.**

3250 Mary Street, Suite 100  
Miami, Florida 33133  
Telephone: (305) 567-5576  
Facsimile: (305) 567-9343

By: /s/Daniel E. Vielleville Peter E. Berlowe (FBN 143650)  
Daniel E. Vielleville (FBN 940496)

***Attorneys for Plaintiffs Five for Entertainment, S.A.,  
d/b/a Five Live Entertainment, and Diego Hernán de Iraola***

By: /s/ Edwin Prado Galarza  
Prado, Núñez & Asociados, P.S.C.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

FIVE FOR  
ENTERTAINMENT S.A.,  
d/b/a FIVE LIVE  
ENTERTAINMENT and  
DIEGO HERNAN DE  
IRAOLA,

Plaintiffs,

v.

RAMON LUIS AYALA  
RODRIGUEZ a/k/a/ DADDY  
YANKEE, EL CARTEL  
RECORDS INC., ICARO  
SERVICES INC., and EDGAR  
BALDIRI MARTINEZ,

Defendants.

**CASE NO.: 11-CV-24142-  
Seitz/Simonton**

**EDGAR BALDIRI  
MARTINEZ' ANSWER TO  
PLAINTIFFS' FIRST SET  
OF INTERROGATORIES  
IN AID OF EXECUTION**

**ANSWER TO INTERROGATORY**

Defendant hereby poses a general objection to all questions in the Interrogatory for the following reasons:

- a) The interrogatories are so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant;
  - b) This discovery request seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the discovery of admissible evidence in violation of the collateral source rule. This request is also an invasion of defendants' right to privacy;
  - c) The information sought in this discovery request is equally available to the propounding party;
  - d) The interrogatory would necessitate the preparation of a compilation, abstract, audit or summary from documents in defendants' possession; because such preparation would be similarly burdensome and/or expensive to both the propounding and responding parties, defendant herewith offers to permit review of the documents enclosed from which propounding party can audit, inspect, copy or summarize. Responding party is making said documents available for review with the notification of this interrogatory.
1. Please provide all of your contact information, including, for example, your name, home address, home telephone number, job designation, and email address.

**EDGAR BALDIRI MARTINEZ SILVA  
2481 EAGLE RUN DR.  
WESTON, FL 33327  
icaroservices@gmail.com**

2. Identify the amount of shares you have ever owned, directly or indirectly, of any domestic or foreign company within the past four years, the number of shares you currently own, directly or indirectly, the date that you sold any shares of stock within the past four years, the amount of money you received for such sale of shares of stock, and the name and contact information of any recipient of any transfers of such shares.

**95% Shares of Icaro Comercializadora Regional de Medios, Bogota Colombia;  
95% Shares of Icaro Publicidad & Mercadeo, Bogota Colombia;  
50% Shares of Icaro Services, Inc., United States;  
50% Shares of Alem Investments, Inc., United States;  
100% Shares of Icaro Records, Inc., San Juan, Puerto Rico**

3. Identify all real property and vehicles owned or leased by you within the past four years, the current location and value of such property, any and all identifying documentation such as deeds or title, and to the extent any real property or vehicles have been transferred to another owner in the last four years, the contact information of the recipient and the value received by you for the transfer of such real property or vehicle.

**All properties listed belong to the conjugal partnership comprised of Edgar Baldiri Martínez and Amanda Lopez.**

**DG 91 #4-20 Apt. 102 Bogota Combia  
Approximate Value of \$200,000  
Deed #729; Date: March 22, 2002;**

**Banco Granahorrar Bank, Bogota Colombia  
Copy of deed included**

**4505 Will Creek Dr. Winter Springs, Orlando Florida 32708  
Suntrust Bank (sold under Short Sale)**

**2481 Eagle Run Drive, Weston, Florida 33327  
Title under: Amanda Lopez and Edgar B. Martinez  
Approximate Value \$600,000  
Copy of deed included**

**Nissan 2014, copy of registration included  
Edgar B. Martínez**

**Volkswagen EOS 2008, copy of registration included  
Amanda Lopez and Edgar B. Martinez**

**MAZDA 2004 License Plate BND 977,  
copy of registration not on hand.**

**TOYOTA 2011 FORTUNA, License Plate RLT234, copy of registration not on hand.**

4. State your social security number, and produce a copy of your social security card.

**SS#: [REDACTED] 5024**

**See copy of social security card enclosed.**

5. Identify any and all checking, savings, passbook, certificate of deposit, or other bank or financial accounts held in your name, or accounts in any name over which

you have or have had signatory authority or other such control, in the past five (5) years, the institution where such bank account is held, and the current balance in each such account.

**(1) Citibank Weston Florida**

#REDACTED 1413 Balance – embargoed account

**(2) Bancolombia, Bogotá Colombia**

*Savings #REDACTED 2231 Balance \$2,240,856.93 (Colombian pesos)*  
*Checking REDACTED 8886 Balance \$1,209.29 (Colombian pesos)*

**(3) Chase, Weston, Florida**

REDACTED 0695 Balance \$1,000 – Checking  
REDACTED 3695 Balance \$86 - Savings

**(4) Wells Fargo, Weston Florida:**

REDACTED 8136 Balance 714.00;  
*joint account: Edgar B. Martinez and Amanda Lopez*

REDACTED 1584 Balance 1,747.00;  
*joint account: Mateo Martinez and Edgar B. Martinez*

REDACTED 7927 Balance -30  
*account holder: Edgar B. Martinez*

REDACTED 1514 Balance \$0  
*joint account: Mateo Martinez and Edgar B. Martinez*

**Please refer to Icaro Services, Inc.’s (“ISINC”) Answer to Interrogatories #4 in relation to ISINC Bank Accounts.**

6. Identify all credit, debit and/or ATM cards which you use or as to which you have as to which you have signatory authority or other such control, wherever located and regardless of whose name appears on the account(s), in the past five (5) years.

*Credit Card/Citibank Mastercard #REDACTED 0258*  
*Debit Card/Citibank REDACTED 6556*

**Please refer to Icaro Services, Inc.’s (“ISINC”) Answer to Interrogatories #4 in relation to ISINC credit, debit/ATM cards.**

7. Identify all domestic and/or foreign **trusts** in which you are or have been a settlor, trustee, trust protector, and/or beneficiary in the past five (5) years.

**Bancolombia, Bogota Colombia**  
*Fiducuenta REDACTED 0685; Balance 153,545.55 (Colombian pesos)*

8. Identify all limited partnerships in which you have or have had an interest at any time in the past five (5) years.

**Icaro Comercializadora Regional de Medios, Bogota Colombia (Inactive)**  
**Icaro Services, Inc., Tallahassee, Florida, United States**  
**Alem Investments, Inc., Tallahassee, Florida, United States**  
**Icaro Records, Inc. San Juan, Puerto Rico, United States.**



9. Identify, and produce copies of, all journals, books, receipts, and any other documents reflecting, stating, identifying, and/or describing: (a) assets located in the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees; and (b) assets located outside the United States which you possess (or have possessed at any time over the past five (5) years) or which you control (or have controlled at any time over the past five (5) years) directly or through other persons, entities, or nominees.

**(a) Infinity 2011 (copy of last registration included-sold approximately 2013)**

**(b) Not applicable / None**

10. Please state whether you have been employed in the last four years, including any consulting work or work which paid on a commission basis, and identify the name, address, telephone number and business purpose of any and all employer(s) or principles in the last four (4) years. For any consulting work or commission-based work, identify the amount of income such work has generated.

**I was the Chief Executive Officer of Icaro Services, Inc. Four years ago I had a salary of \$4,000 dollars a month. Two years ago the amount was reduced to \$2,000, and currently I receive no salary.**

11. Provide a list of any person or entity that received any assets from you, in whatever title, valued at \$1,000 or more within the last four (4) years.

**I sold my Infinity 2011 approximately in 2013 for the amount of \$44,000.**

12. Identify all intellectual property currently owned by you or that has been owned by you in the last four years, directly or indirectly, and the current value of such property.

**Not applicable / None**

13. Identify all contracts and/or agreements relating to intellectual property identified in response to the preceding question executed and/or entered into by you, directly or indirectly, within the past (5) years, stating the name, address and contact information of all parties involved in those contracts and/or agreements.

**Not applicable / None**

14. State whether you are aware of any **transfers of assets valued at \$5,000** or more made by any of the other Defendants in this action within the last three (3) years, and identify each such transfer.

**None to my knowledge.**

15. Identify any monies owed to you by any person, organization, or legal entity, and state the amount of the debt.

**The interrogatory is objected because it is so broad and unlimited as to time and scope as to be an unwarranted annoyance, embarrassment, and is oppressive. To comply with the request would be an undue burden and expense on the defendant. The request is calculated to annoy and harass defendant. I cannot specify or indicate the monies that will be owed, as many depend on statements that are yet to be received or tabulated. However, please refer to Icaro Services, Inc.'s ("ISINC") Answer to Interrogatories #14 in relation to monies owed.**

**SWORN STATEMENT PURSUANT TO 28 U.S.C. §1746 (1)**

I, Edgar Baldiri Martínez, certify under penalty of perjury under the Laws of the United States of America that I have verified the above answers to interrogatories in the above captioned case; and that the foregoing, as well as the above answers, are true and correct to the best of my knowledge, information and belief.

Executed on February 06, 2015.



---

**Edgar Baldiri Martínez**

Dated: February 6, 2015

POLENBEG COOPER PA

Jon Polenberg, Esq.  
jpolenberg@polenbergcooper.com  
Jude Christopher Cooper, Esq.  
jcooper@polenbergcooper.com  
1351 Sawgrass Corporate Parkway  
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Fort Lauderdale, FL 33323  
Telephone: 954-742-9995  
Facsimile: 742-9971

PRADO NUNEZ & ASSOCIATES

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pradolaw10@gmail.com  
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San Juan, PR 00912  
Telephone: (787) 977-1411

*Attorneys for Defendants El Cartel,  
Ramón Luis Ayala Rodríguez  
and Icaro Services Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 6, 2015, a true and correct copy of the foregoing was served to the parties listed below in the manner so stated.

**SERVICE LIST**

**Via E-mail**

**WINSTON & STRAWN LLP**

Eric W. Bloom (pro hac vice)  
Tomás Leonard (pro hac vice)  
Margaret Ciavarella (pro hac vice)  
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