

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 11-25608-CA-02

CARIBEVISION HOLDINGS, INC., et al.

Plaintiffs,

v.

OMAR ROMAY, et al.

Defendants.

NOTICE OF FILING APPLICANTS' RECEIVERSHIP BOND

Plaintiffs, Caribevision Holdings, Inc., Caribevision TV Network, LLC, Caribevision Station Group, LLC, Mediaset Espana Comunicacion, S.A., Grupo Brabur, S.A. de C.V., and Grupo Colte, S.A. de C.V., hereby give notice of filing the attached Receivership Bond in accordance with this Court's Order dated May 6, 2015.

Respectfully submitted,

DORTA & ORTEGA, P.A.



Omar Ortega, Esq.

Florida Bar No.: 0095117

Nicole Ruesca, Esq.

Florida Bar No.: 0098127

3860 SW 8th Street, PH

Coral Gables, FL 33134

Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic correspondence on this 27th day of May, 2015 to:

David Rogero, Esq. David M. Rogero, P.A. 2625 Ponce de Leon Boulevard, Suite 280 Coral Gables, Florida 33134 dmrogero@dmrpa.com yhayala@dmrpa.com	Adam Schachter, Esq. Dan Gelber, Esq. Freddy Funes, Esq. 1441 Brickell Avenue, Suite 1420 Miami, Florida 33131 aschachter@gsgpa.com dan@gsgpa.com ffunes@gsgpa.com efilings@gsgpa.com
Kendall Coffey, Esq. Benjamin H. Brodsky, Esq. COFFEY BURLINGTON 2601 South Bayshore Drive, PH Miami, FL 33133 kcoffey@coffeyburlington.com bbrodsky@coffeyburlington.com	Pedro V. Roig, Esq. 1350 SW 57th Avenue, Suite 317 Miami, FL 33144 pedrovroiglaw@gmail.com Receiver
Jose A. Villalobos, Esq. Akerman, LLP 1 SE 3rd Avenue, 25th Floor Miami, FL 33131 Jose.villalobos@akerman.com Counsel for Receiver	

/s/

OMAR ORTEGA

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION
CASE NO.: 11-25608 CA 02

CARIBEVISION HOLDINGS, INC.,
CARIBEVISION TV NETWORK, LLC,
CARIBEVISION STATION GROUP,
LLC, MEDIASET ESPANA
COMUNICACION, S.A., BRABUR, S.A.
DE C.V., COLTE, S.A. DE C.V.,

Plaintiffs,

v.

OMAR ROMAY, AMERICA-CV
NETWORK, LLC, AMERICA-CV
STATION GROUP, INC., AMERICA
TEVE NETWORK, INC., PROMISA,
INC., OKEECHOBEE, TELEVISION CORP.,

Defendants.

THE ORIGINAL FILED
IN THE OFFICE OF

CLERK COUNTY COURT DADE CO.
MAY 27 2015
ON _____

RECEIVERSHIP BOND

BOND NUMBER: K09003034

WE, Caribevision Holdings, Inc., Caribevision TV Network, LLC, Caribevision Station Group, LLC, Mediaset Espana Comunicacion, S.A., Brabur, S.A. de C.V., and Colte, S.A. de C.V, as principals, and Westchester Fire Insurance Company as surety, are bound to America CV Network, LLC, America CV Station Group, Inc., Omar Romy, Promisa, Inc., and Okeechobee Television Corp., in the total sum of \$2,250,000.00 for the payment of which we bind ourselves, our heirs, personal representatives, successors and assigns, jointly and severally.

THE CONDITION OF THIS BOND is that if Plaintiffs pays all costs and damages that a Court determines were sustained by Defendants because of the wrongful

appointment of the receiver, then this bond is void; otherwise it remains in force.

Principals:

Caribevision Holdings, Inc.,

By: 

Carlos Vasallo as President

Signed on this 20 day of May, 2015

Caribevision TV Network, LLC

By: 

Carlos Vasallo as President

Signed on this 20 day of May, 2015

Caribevision Station Group, LLC.

By: 

Carlos Vasallo as President

Signed on this 20 day of May, 2015

Mediajet Espana Comunicacion, S.A.,

By: 

Ruben Moya as General Manager

Signed on this 20 day of May, 2015

Brabur, S.A. de C.V.

By: 

Ruben Moya as Manager

Signed on this 20 day of May, 2015

Colte, S.A. de C.V.

By: 

Ruben Moya as Manager

Signed on this 20 day of May, 2015

Pegase TV

By: 

Alejandro Quinones
as Officer

Signed on this 20 day of May, 2015

Surety: WESTCHESTER FIRE INSURANCE COMPANY

c/o Unique Surety and Insurance Services, LLC

By: 

Robert S. Gussstein as
as Attorney in Fact

as Surety WESTCHESTER FIRE INSURANCE COMPANY

Signed on this 27th day of May, 2015

Approved on this _____ day of May, 2015.

HARVEY RUVIN

Clerk of Court

By: _____

As Deputy Clerk

Power of Attorney

WESTCHESTER FIRE INSURANCE COMPANY

Know all men by these presents: That WESTCHESTER FIRE INSURANCE COMPANY, a corporation of the Commonwealth of Pennsylvania pursuant to the following Resolution, adopted by the Board of Directors of the said Company on December 11, 2006, to wit:

"RESOLVED, that the following authorization refers to the obligations, for and on behalf of the Company of bonds, undertakings, recognizances, contracts and other written commitments of the Company entered into in the ordinary course of business (each a "Written Commitment"):

- (1) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise.
- (2) Each duly appointed attorney-in-fact of the Company is hereby authorized to execute any Written Commitment for and on behalf of the Company, under the seal of the Company or otherwise, to the extent that such action is authorized by the grant of powers provided for in such person's written appointment as such attorney-in-fact.
- (3) Each of the Chairman, the President and the Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to appoint in writing any person the attorney-in-fact of the Company with full power and authority to execute, for and on behalf of the Company, under the seal of the Company or otherwise, such Written Commitments of the Company as may be specified in such person's appointment, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.
- (4) Each of the Chairman, the President and Vice Presidents of the Company is hereby authorized, for and on behalf of the Company, to delegate in writing any other officer of the Company the authority to execute, for and on behalf of the Company, under the Company's seal or otherwise, such Written Commitments of the Company as are specified in such written designation, which specification may be by general type or class of Written Commitments or by specification of one or more particular Written Commitments.
- (5) The signature of any officer or other person executing any Written Commitment or appointment or delegation pursuant to this Resolution, and the seal of the Company, may be affixed by facsimile on such Written Commitment or written appointment or delegation.

FOR YOUR RECORD, that the foregoing Resolution shall not be deemed to be an exclusive statement of the powers and authority of officers, employees and other persons to act for and on behalf of the Company, and such Resolution shall not limit or otherwise affect the exercise of any such power or authority otherwise validly granted or vested.

Does hereby nominate, constitute and appoint Robert S. Goldstein, Robin Goldstein, all of the City of PALM BEACH GARDENS, Florida, each individually if there be more than one named, its true and lawful attorney-in-fact, to make, execute, seal and deliver on its behalf, and as its act and deed any and all bonds, undertakings, recognizances, contracts and other writings in the nature thereof in penalties not exceeding Five million dollars & zero cents (\$5,000,000.00) and the execution of such writings in pursuance of these presents shall be as binding upon said Company, as fully and amply as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its principal office.

IN WITNESS WHEREOF, the said Stephen M. Haney, Vice-President, has hereunto subscribed his name and affixed the Corporate seal of the said WESTCHESTER FIRE INSURANCE COMPANY this 19 day of November 2013.

WESTCHESTER FIRE INSURANCE COMPANY



Stephen M. Haney
Stephen M. Haney, Vice President

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA ss.

On this 19 day of November, AD 2013 before me, a Notary Public of the Commonwealth of Pennsylvania in and for the County of Philadelphia came Stephen M. Haney, Vice-President of the WESTCHESTER FIRE INSURANCE COMPANY in me personally known to be the individual and officer who executed the preceding instrument, and he acknowledged that he executed the same, and that the seal affixed to the preceding instrument is the corporate seal of said Company; that the said corporate seal and his signature were duly affixed by the authority and direction of the said corporation, and that Resolution, adopted by the Board of Directors of said Company, referred to in the preceding instrument, is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at the City of Philadelphia the day and year first above written.



COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
KAREN E. BRANDT, Notary Public
City of Philadelphia, Phila. County
My Commission Expires September 26, 2014

Karen E. Brandt
Notary Public

I, the undersigned Assistant Secretary of the WESTCHESTER FIRE INSURANCE COMPANY, do hereby certify that the original POWER OF ATTORNEY, of which the foregoing is a substantially true and correct copy, is in full force and effect.

In witness whereof, I have hereunto subscribed my name as Assistant Secretary, and affixed the corporate seal of the Corporation, this 27th day of MAY 2015



William L. Kelly
William L. Kelly, Assistant Secretary

THIS POWER OF ATTORNEY MAY NOT BE USED TO EXECUTE ANY BOND WITH AN INCEPTION DATE AFTER November 19, 2015.