

I.D.S. No. 5747615 Jail No. 43584 Police Case No. 2563273C

P.S.D. Records I.D. No. _____ Municipal P.D.I.D. No. _____

Defendant's Name NUNEZ, MARIA F Date of Birth 9-27-24
(Last) (First) (Middle) (Month, Day, Year)

Alias _____ Local Address 3658 S.W. 74 ST. MIAMI Sex F Race W
(City) (State) (Zip)

Permanent Address 3658 SW 14 ST, MIAMI, FLA Phone NONE Hgt. 5'4" Wt. 134
(City) (State) (Zip)

Business Address UNK Taken to County Station DB Eyes BRN Hair BR

Soc. Sec. No. UNK Occ. NEWS MEDIA POB: CUBA Scars-Tattoos _____

Arrest Date SEPT 13, 1978 Time 1205 Location 819 SW 12 AVE.
(Month, Day, Year) (Place of Arrest)

Co-Defendant's Name _____ / STATUS AT LARGE IN CUSTODY
(Last) (First) (Middle) FELONY MISDEMEANOR JUVENILE

Co-Defendant's Name _____ / STATUS AT LARGE IN CUSTODY
(Last) (First) (Middle) FELONY MISDEMEANOR JUVENILE

C1. TRESPASSING AFTER WARNING Viol. of F.S. 810.08 CAPIAS/CIT. # 78-63299
H
A 2. _____ In Viol. of F.S. _____ CAPIAS/CIT. # _____

_____ In Viol. of F.S. _____ CAPIAS/CIT. # _____
_____ In Viol. of F.S. _____ CAPIAS/CIT. # _____
_____ In Viol. of F.S. _____ CAPIAS/CIT. # _____

WITNESSES AGAINST DEFENDANT: see reverse side for additional witnesses In Viol. of Sec. 38-50
of the code of MIAMI

Name RAFAEL YILLA YERDE Address: 819 SW 12 AVE Phone 858-0887

Name LILY ESTEVEZ Address: 819 SW 12 AVE Phone 858-0887

Arresting Officers GM BROUSSARD / M. FERNANDEZ Ct. ID No. 0620/128 Dept. 01
undersigned certifies and swears that he has just and reasonable grounds to believe, and does believe that the above named Defendant
the 13 day of SEPT, 1978, At 1205 819 SW 12 AVE
(Time) (Location)

Admitted the following violation of law: Narrative; (Be specific) WAS ASKED TO LEAVE AFTER CREATING COMMOTION AT THE LITTLE HAVANA ACTIVITIES CENTER BY COORDINATOR IN THE PRESENCE OF THESE OFFICERS. DEFENDANT WAS AGAIN ASKED BY THESE OFFICERS TO LEAVE. DEFENDANT REFUSED. DEFENDANT WAS INCARCERATED ~~BECAUSE SHE~~ ~~WAS ASKED TO LEAVE~~ ~~AND SHE REFUSED~~ ~~TO LEAVE~~ ~~THE OFFICERS FELT HER SIGNING WOULD NOT EFFECTIVELY END~~

FOR RECORD
SEP 13 AM 1978
MIRIAM H. BLOOM
CLERK OF COURT
DADE COUNTY, FLA.

DIVISION 5-2

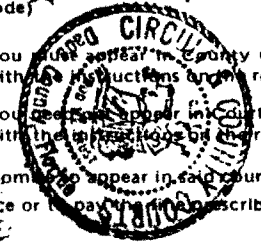
DETACH IF FELONY OR RELATED CHARGE (EXCEPT JUVENILE) 114.02-142 REV. JAN. 1974

STATE OF FLORIDA: Juvenile
COUNTY OF DADE Misdemeanor/Ordinance Violation Arrest Form

Arresting Agency 01 Resident of: FLORIDA
(Numeric Code) Dade County Other

I swear the above statement is correct and true to the best of my knowledge and belief.
[Signature]
Officer's Signature
Dept. 01 Ct. ID No. 0620
Sworn to and subscribed before me, the undersigned authority this 13 day of SEPT 19 78
[Signature]
Deputy of the Court of Notary Public

You must appear in County Court and comply with the instructions on the reverse side hereof.
 You need not appear in Court, but must comply with the instructions on the reverse side hereof.
I promise to appear in said court at said time and place or to pay the fine prescribed for this offense.



CREDIT TO: 01
COURT COPY
Police Case No. 2563273C

'79 JAN 16 PM 3 54

RICHARD E. BRINKER
CLERK, CIRCUIT & COUNTY CTS.
DADE COUNTY, FLA.
07

IN THE COUNTY COURT IN AND
FOR DADE COUNTY, FLORIDA

CASE NO.: 78-63299

CRIMINAL DIVISION

THE STATE OF FLORIDA,)	
Plaintiff)	
vs.)	DISCOVERY UNDER FLORIDA
MARIA E. NUNEZ,)	CRIMINAL PROCEDURE RULE
Defendant)	3.220-6.18

COMES NOW the defendant, MARIA NUNEZ, by and through her undersigned attorney, and files this discovery as follows:

1. The witnesses whom the defendant expects to call as witnesses to the trial are:

Ms. Hilda Inclan
10371 S.W. 44 Street
Miami, Florida 33165

Ms. Laura Arce
591 West 33rd Place
Hialeah, Florida 33012

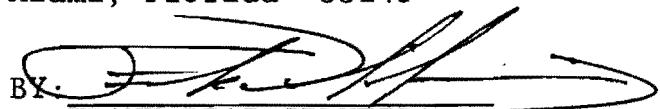
Ms. Marta Suarez
3370 S.W. 25 Street
Miami, Florida 33133

Ms. Raida Peraza
1615 N.W. 8 Terrace
Miami, Florida 33125

Mr. Miguel A. Fernandez, Officer
City of Miami Police Dept.
Metro Justice Building
1351 N.W. 12 Street
Miami, Florida 33125

I HEREBY CERTIFY that a true and correct copy of the foregoing Discovery was mailed to the Assistant State Attorney, RODOLFO SORONDO, on this 12th day of January, 1979.

DIAZ SILVEIRA AND ASSOCIATES
3007 Coral Way
Miami, Florida 33145

BY: 
FRANK DIAZ SILVEIRA
Attorney for Defendant/Nunez

(WITHHOLD ADJUDICATION) JUDGMENT OF GUILT AND PLACING DEFENDANT ON PROBATION

STATE OF FLORIDA

FILED FOR RECORD

Plaintiff
VS

'79 FEB -5 PM 2 26

In the County Court,

of Dade County, Florida

Nunez Maria
Defendant

RICHARD P. BRINKEK
CLERK, CIRCUIT &
COUNTY CTS.
DADE COUNTY, FLA.
07

CASE NO. 78-63299

3058 S.W. 14th St
Street Address

Miami, Fla.
City, State

44363 23
Zip

44363 23
Phone Number

This case coming on this day to be heard before me, and you, the Defendant,

being now present before me, and you

having: ENTERED A PLEA OF GUILTY TO
ENTERED A PLEA OF NOLO CONTENDERE TO
BEEN FOUND GUILTY BY THE VERDICT OF A JURY OF
BEEN FOUND GUILTY BY THE COURT TRYING THE CASE WITHOUT A JURY OF

the offense of Trespass after warning

the court hereby ~~found~~ (adjudged) you to be guilty of said offense; and

It appearing to the satisfaction of the Court that you are not likely again to engage in a criminal course of conduct, and that the ends of justice and the welfare of society do not require that you should suffer the penalty authorized by law.

Now, therefore, it is ordered that (adjudication of guilty and) the imposition of sentence is hereby withheld and that you are hereby placed on probation for a period of 6 months under the supervision of the Salvation Army Corrections Division and its supervisor.

It is further ordered that you shall comply with the following conditions of probation:

- (1) You will not change your residence or employment or leave Dade County and/or the county of your residence without first procuring the consent of your Probation Supervisor.
- (2) You will report in person each month, on an assigned date, to the Corrections Department unless otherwise directed by your Probation Officer or Supervisor.
- (3) You will neither possess, carry or own any weapons or firearm without first securing the consent of your Probation Supervisor.
- (4) You will live and remain at liberty without violating any law. A conviction in a court of law shall not be necessary in order for such a violation to constitute a violation of your probation.
- (5) You will not use intoxicants to excess; nor will you visit places where intoxicants, drugs or other dangerous substances are unlawfully sold, dispensed or used unlawfully.
- (6) You will work diligently at a lawful occupation and support any dependents to the best of your ability, as directed by your Probation Supervisor.
- (7) You will promptly and truthfully answer all inquiries directed to you by the Court or the Probation Supervisor, and allow the Supervisor to visit in your home, at your employment site or elsewhere, and you will comply with all instructions he may give you.
- (8) You will pay ten dollars (\$10) per month to cover the cost of this supervision and rehabilitation beginning on the date to be set by your Probation Supervisor.
- (9) You will be responsible for any special conditions added by the presiding Judge.

(10) NOT TO HARASS OR ENTER PREMISES OF LITTLE HAWAIIAN ACTIVITIES CENTER AT 819 S.W. 12 AVE.

You are hereby placed on notice that the Court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision; and that if you violate any of the conditions of your probation, you may be arrested and the Court may revoke your probation and impose any sentence which it might have imposed before placing you on probation.

It is further ordered that when you have reported to the Probation Supervisor and have been instructed as to the conditions of probation, you shall be released from custody if you are in custody and if you are at liberty on bond, the sureties thereon shall stand discharged from liability.

It is further ordered that the Clerk of this Court file this order in his office, record the same in the Minutes of the Court, and forthwith make available a certified copy of same to the Probation Supervisor of the Salvation Army Corrections Division.

DONE AND ORDERED IN OPEN COURT, this the 5

day of Feb., 19 79.

C. P. Rubiera
JUDGE C.P. RUBIERA
Judge

I certify that the conditions of my Probation as outlined above, has been explained to me

Replica Publishing, Inc. d/b/a "Replica"
vs.
Republica News Corp. et al

Page 29
Docket 313
Division FRANCIS J. CHRISTIE
CASE NO. 72 25104

AA-294-02

CIVIL ACTION IN CIRCUIT COURT

IN AND FOR
DADE COUNTY, FLORIDA

This File Must Not Be Withheld from
Clerk's Office Without Leave of Court.
E. B. LEATHERMAN,
Clerk, Circuit Court

16

Replica Publishing Inc.
d/b/a
"Replica"

Plaintiff

vs.

Republica News Corp. et al

Defendant

Action for INJUNCTION

Litman & Mucknick

Attorney for Plaintiff

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

NO. **72-25104**

72 DEC 8 AM 8:30
CLERK CIRCUIT COURT
DADE CO. FLORIDA

FILED FOR RECORD

REPLICA PUBLISHING, INC., a)
Florida corporation, d/b/a)
"REPLICA",)
Plaintiff,)

vs.)

REPUBLICA NEWS CORP., a Florida)
corporation, MARIETA FANDINO and)
FERNANDO BALIDO,)
Defendants.)

COMPLAINT FOR INJUNCTION
AND OTHER RELIEF

FRANCIS J. CHRISTIE

Depo 1600
Ass 3

COMES NOW the Plaintiff, REPLICA PUBLISHING, INC., a Florida corporation, d/b/a "REPLICA", and for its complaint against the Defendants, REPUBLICA NEWS CORP., a Florida corporation, MARIETA FANDINO and FERNANDO BALIDO, alleges:

1. This is an action for injunctive relief both temporary and permanent and for damages within the jurisdiction of this Court.
2. Plaintiff is a Florida corporation doing business in the State of Florida, County of Dade, and at all times material herein did business under its trade name "Replica".
3. Defendant, REPUBLICA NEWS CORP., is a Florida corporation, doing business in the State of Florida, County of Dade, under the name of "Republica", and the individual defendants are residents of the State of Florida, County of Dade, and are over the age of twenty-one (21) years.
4. That at all times hereinafter material, the Plaintiff is now and ever since approximately October, 1967, been engaged in Dade County, Florida, principally in the newspaper publishing business, publishing a latin newspaper under the fictitious name of "Replica", with its principal place of business at 45 S. W. 36th Court, Miami, Florida, and that at all times hereinafter material the Plaintiff operated and engaged in the weekly newspaper publishing business

principally in Dade County, Florida, for primarily utilization by the latin community under the Plaintiff's trade name and logo on its newspaper masthead "Replica".

5. The Defendant corporation was incorporated on or about September 19, 1972, and since on or about October 5, 1972, has commenced publication of a weekly newspaper for utilization primarily by the latin community in Dade County, Florida, under the alleged fictitious or trade name "Republica" and the individual Defendants are employed by the Defendant corporation in the publication of the aforesaid newspaper as agents, servants and/or employees.

6. That the individual Defendants were formerly associated with the Plaintiff's newspaper publication as independent advertising salesmen and shortly prior to the formation of the Defendant corporation, the individual Defendants terminated their association with the Plaintiff.

7. That the newspaper business in which the Plaintiff is and has been engaged by reason of the Plaintiff's competent and efficient manner in conducting said business and by reason of the reputation of said business under the Plaintiff's trade name "Replica" has acquired and now commands an extensive patronage in Dade County, Florida, and principally in the City of Miami, and that for the aforesaid reasons the Plaintiff under its trade name has acquired and has good will and an outstanding reputation in said newspaper publishing business, all of which is of great value.

8. That on or about September 19, 1972, when the Defendant corporation was organized, the individual Defendants, formerly associated with the Plaintiff, knowing full well the Plaintiff's adoption and use of its trade name "Replica", organized the Defendant corporation under practically the identical name previously adopted and used by the Plaintiff as aforesaid, to-wit: Republica News Corp.; that further the express purpose for which the Defendant corporation was organized and the express purpose of the Defendant corporation's utilization of the trade name "Republica" was and is to confuse the public with whom the Plaintiff trades and deals into believing that in fact they were obtaining the Plaintiff's newspaper "Replica", whenever obtaining the Defendant's newspaper "Republica".

9. That the Defendants both corporate-wise and individually, adopted the name "Republica" on their masthead and in their newspaper and further copied the logo and style of the Plaintiffs newspaper with the intent and for the express purpose of defrauding the Plaintiff and appropriating to their own use and benefit the good will of Plaintiff's newspaper business and of deluding and deceiving Plaintiff's customers and the public in general into the belief that the business of the Plaintiff in the publication of the weekly newspaper known as "Replica" was being and would be conducted and continued in effect by the Defendants under the name of "Republica".

10. That immediately upon the Plaintiff having knowledge that the Defendants had caused to be published its first weekly publication of the newspaper known as "Republica", the Plaintiff requested the Defendants, and each of them, to refrain from the use of said name in their alleged newspaper business in the City of Miami, Dade County, Florida; that the Defendants and each and all of them refused and still refuse to refrain from using said name in the City of Miami, Dade County, Florida or elsewhere; but on the contrary Plaintiff is informed and believes and therefor alleges that the Defendants intend to continue unless restrained by this Court an extensive campaign of advertising their alleged newspaper business under the name of "Republica"; that if the Defendants continue and are allowed to continue the utilization of said name, they will actually mislead many customers of the Plaintiff, both actual and prospective, to patronize and read Defendants' newspaper publication in the belief that they are patronizing and actually reading the Plaintiff's newspaper publication.

11. That if the Defendants are permitted to carry on with a newspaper publishing business comparable in all respects in style, format, logo and under the name of "Republica" within Dade County, Florida, or elsewhere, all of the Plaintiff's customers and prospective customers and all of the public in general in the latin community in Dade County, Florida, which have read and utilized Plaintiff's newspaper will at all times be deceived, misled and defrauded into believing that the business so conducted by the Defendants is in fact the business of the Plaintiff, all of which is and will be to the injury and damage of the Plaintiff

and the public.

12. That unless the Defendants are enjoined and restrained, the Defendants will continue to proceed to carry on their business under the name of "Republica" for and with the intention and purpose of deceiving Plaintiff's customers and the public into believing that the Plaintiff's Business is the Defendants' business; that the name "Republica" adopted by the Defendants for their newspaper publication business and for the Defendant corporation, was calculated and intended by the Defendants to deceive customers of the Plaintiff and the public; that the acts of the Defendants have created and will continue to create much confusion in Plaintiff's business; that said act of continuing the use of the name "Republica" if allowed to continue will cause the Plaintiff to suffer irreparable harm and injury and the Plaintiff in fact does not have an adequate remedy at law save and except through the Court's power to enjoin and restrain, both temporarily and permanently, the Defendants from continuing with the use of the name "Republica".

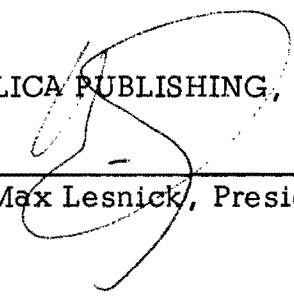
WHEREFORE, Plaintiff prays for the following relief against the Defendants from the Court:

A. That a hearing be held as soon hereafter as may be possible by the Court to hear and consider Plaintiff's application against the Defendants for a temporary injunction, and that at said hearing the Defendants and each of them, and all persons acting for them as agents, or otherwise, be temporarily enjoined and restrained from using the name "Republica", and that they be enjoined from doing business under said name, or using the same in any manner or fashion whatsoever in connection with the publication of any latin newspaper comparable or similar to the Plaintiff's wherein the name "Republica" might be attempted to be utilized.

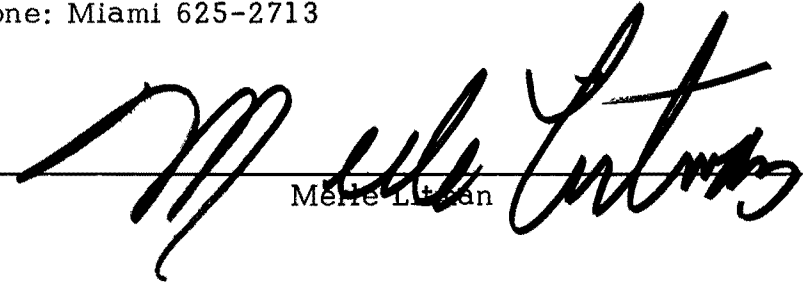
B. That further a temporary restraining order be granted Plaintiff on its application for a temporary injunction, enjoining and restraining the Defendants, their officers and agents and each of them from doing or causing to be done or continuing any of said acts or things herein complained of during the pendency of this action.

C. That upon final hearing and trial of this cause the Court enter a permanent injunction against the Defendants and each of them and their agents, servants, employees or otherwise, enjoining and restraining all of them from the use of the name "Republica", and that they be enjoined and restrained from doing business under said name or using the same in any manner or fashion whatsoever in the publication of any newspaper circulated throughout the latin community principally in Dade County, Florida.

D. That the Plaintiff have and recover against the Defendants any and all damages sustained by the Plaintiff by reason of the Defendant's wrongful acts as hereinabove alleged.

REPLICA PUBLISHING, INC.
 By 
 Max Lesnick, President


LITMAN and MUCHNICK
 Attorneys for Plaintiff
 P. O. Box 3616
 Hollywood, Florida 33023
 Phone: Miami 625-2713

By 
 Melie Litman

STATE OF FLORIDA)
 COUNTY OF BROWARD) SS

BEFORE ME, the undersigned authority, personally appeared MAX LESNICK, as President of REPLICA PUBLISHING, INC., a Florida corporation, who after being by me first duly sworn upon his oath deposes and says that he has read the above and foregoing Complaint for Injunction and Other Relief and based upon his own personal knowledge of the matters as alleged states that said allegations are true and correct.

WITNESS my hand and Official Seal in the state and county aforesaid, this 8th day of December, 1972.

My Commission expires: _____

 Notary Public, State of Florida at Large

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES MAY 9, 1975
GENERAL INSURANCE UNDERWRITERS, INC.

FILED FOR RECORD

72 DEC 14 AM 11:26

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

E. B. LEATHERMAN
CLERK CIRCUIT COURT.
DADE CO. FLA.

CASE NO. 72-25104

REPLICA PUBLISHING, INC.,
a Florida corporation, d/b/a
"REPLICA",

Plaintiff

-vs-

CIVIL ACTION
SUMMONS

REPUBLICA NEWS CORP., a
Florida corporation, MARIETA
FANDINO and FERNANDO BALIDO

Defendant s

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition
in this action on defendant:

SERVE AT: MARIETA FANDINO
c/o Republica News Corp.
3655 S. W. 14th Street
Miami, Florida

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's
attorney, to wit: LITMAN and MUCHNICK
whose address is: P. O. Box 3616, Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

within 20 days after service of this summons on that defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on
Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be
entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on DECEMBER DEC 8 1972, 19 72

E.B. LEATHERMAN,
as Clerk of said Court

by:  _____
as Deputy Clerk

FILED FOR RECORD

'72 DEC 14 AM 11:26

E. B. LEATHERMAN
CLERK CIRCUIT COURT
DADE CO. FLA.
IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT,
DADE COUNTY,
IN AND FOR
FLORIDA

NO.

72-25104

REPLICA PUBLISHING, INC.,)
a Florida corporation, d/b/a)
"REPLICA",)

Plaintiff,)

vs.)

REPUBLICA NEWS CORP., a)
Florida corporation, MARIETA)
FANDINO and FERNANDO)
BALIDO,)

Defendants.)

NOTICE OF HEARING

TO: REPUBLICA NEWS CORP., 3655 S. W. 14th Street, Miami, Florida;
MARIETA FANDINO, 3655 S. W. 14th Street, Miami, Florida
FERNANDO BALIDO, 16 Boabodilla, Coral Gables, Florida or in the
alternative 3655 S. W. 14th Street, Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's application for temporary

injunctive relief as alleged in the Plaintiff's Complaint

will be brought on for hearing and will be heard by the Honorable FRANCIS J.
CHRISTIE, one of the Judges of the above-styled Court, at 9:30

o'clock, A.M., on DECEMBER 22, 1972,

~~on the regular day of the Dade County Calendar~~ by special appointment or as soon
thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing

Notice of Hearing was this 11 day of December, 1972,
turned over to the Sheriff of Dade County, Florida, for service upon the above named
~~parties to the above-captioned~~ addressee (s).

LITMAN and MUCHNICK
Attorneys for Plaintiff
401 Hollywood Federal Building
5950 Washington Street
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

Merle Litman
Merle Litman, Of Counsel

FILED FOR RECORD

72 DEC 14 AM 11 26

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

REPLICA PUBLISHING, INC. a Florida corporation, d/b/a "REPLICA",

E. B. LEATHERMAN, CLERK OF CIRCUIT COURT, DADE CO. FLA.

CASE NO. 72-25104

Plaintiff

-vs-

CIVIL ACTION SUMMONS

REPUBLICA NEWS CORP., a Florida corporation, MARIETA FANDINO and FERNANDO BALIDO,

Defendants

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant:

SERVE AT:

REPUBLICA NEWS CORP., a Florida corporation
3655 S. W. 14th Street
Miami, Florida

BY SERVICE UPON:

Maria F. Nunez, as President; in the absence of the President by service upon Fernando Balido, Secretary of the corporation; in the absence of the Secretary upon Maria F. Nunez as the designated resident agent for service of process within the State of Florida

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's attorney, to wit:

whose address is:

LITMAN and MUCHNICK
P. O. Box 3616, Hollywood, Florida 33023

Phone: Miami 625-2713 or 625-2797

within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on DECEMBER DEC 8 1972, 1972

E. B. LEATHERMAN,
as Clerk of said Court

by: 

as Deputy Clerk

FILED IN RECORD

DEC 14 AM 11 26

LEATHERMAN
CIRCUIT COURT
DADE CO. FLA.

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

NO.

72-25104

REPLICA PUBLISHING, INC.,)
a Florida corporation, d/b/a)
"REPLICA",)

Plaintiff,)

vs.)

REPUBLICA NEWS CORP., a)
Florida corporation, MARIETA)
FANDINO and FERNANDO)
BALIDO,)

Defendants.)

NOTICE OF HEARING

TO: REPUBLICA NEWS CORP., 3655 S. W. 14th Street, Miami, Florida;
MARIETA FANDINO, 3655 S. W. 14th Street, Miami, Florida
FERNANDO BALIDO, 16 Boabodilla, Coral Gables, Florida or in the
alternative 3655 S. W. 14th Street, Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's application for temporary

injunctive relief as alleged in the Plaintiff's Complaint

will be brought on for hearing and will be heard by the Honorable FRANCIS J.

CHRISTIE, one of the Judges of the above-styled Court, at 9:30

o'clock, A.M., on DECEMBER, 22, 1972

~~at the residence of the defendant~~ by special appointment or as soon
thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing

Notice of Hearing was this 11 day of December, 1972,
turned over to the Sheriff of Dade County, Florida, for service upon the above named
~~parties to the above named~~ addressee (s).

LITMAN and MUCHNICK
Attorneys for Plaintiff
401 Hollywood Federal Building
5950 Washington Street
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

By Merle Litman
Merle Litman, Of Counsel

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

72-25104

NO.

REPLICA PUBLISHING, INC.,)
a Florida corporation, d/b/a)
"REPLICA",)
)
Plaintiff,)
)
vs.)
)
REPUBLICA NEWS CORP., a)
Florida corporation, MARIETA)
FANDINO and FERNANDO)
BALIDO,)
Defendants.)

NOTICE OF HEARING

TO: REPUBLICA NEWS CORP., 3655 S. W. 14th Street, Miami, Florida;
MARIETA FANDINO, 3655 S. W. 14th Street, Miami, Florida
FERNANDO BALIDO, 16 Boabodilla, Coral Gables, Florida or in the
alternative 3655 S. W. 14th Street, Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's application for temporary
injunctive relief as alleged in the Plaintiff's Complaint
will be brought on for hearing and will be heard by the Honorable FRANCIS J.
CHESIE, one of the Judges of the above-styled Court, at 930
o'clock, A.M., on DECEMBER, 22, 1972,
~~on the record and in the presence of the court~~ by special appointment or as soon
thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing
Notice of Hearing was this 11 day of December, 1972,
turned over to the Sheriff of Dade County, Florida, for service upon the above named
~~parties to the above named~~ addressee (s).

LITMAN and MUCHNICK
Attorneys for Plaintiff
401 Hollywood Federal Building
5950 Washington Street
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

By Merle Litman
Merle Litman, Of Counsel

Hearing 12/22/72
For Temp. INJUNCTION

EXHIBIT LIST

Case No. 72-25104 *Replica* vs. *Republicer* Judge F.J. Christie
 Circuit Court. Verdict Date _____

Description of Exhibits	Plif's Exhibit M.F.I.	Plif's Exhibit	Deft's Exhibit M.F.I.	Deft's Exhibit
4-issues - <i>Replica</i>		<i>comp 1</i>		
12-issues - <i>Republicer Oct 1972</i>		<i>comp 2</i>		
Certified copy - <i>Ertistics incorporation</i>		3-		
Check #3945 - 10/9/72 - <i>TO Fernando Balido</i> <i>of Replica Publishing</i>		4-		

REMARKS:

EXHIBITS
IN EXHIBIT FILE
E.B. LEATHERMAN
 CLERK OF COURT
 DADE CO. FLA.
 72 DEC 22 PM 2:01
 FILED FOR RECORD

W. Thompson
 Court Clerk
Marty A. BiLotti
 File Clerk
 Court Reporter

FILED IN RECORD

72 DEC 14 AM 11 26

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

REPLICA PUBLISHING, INC., CO. FLA.
a Florida corporation, d/b/a
"REPLICA",

CASE NO. **72-25104**

Plaintiff

-vs-

CIVIL ACTION
SUMMONS

REPUBLICA NEWS CORP., a
Florida corporation, MARIETA
FANDINO and FERNANDO BALIDO,

Defendant s

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition
in this action on defendant:

SERVE AT: FERNANDO BALIDO
16 Boabodilla
Coral Gables, Florida

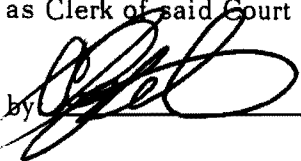
OR IN THE ALTERNATIVE
SERVE AT: c/o Republica News Corp.
3655 S. W. 14th Street
Miami, Florida

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's
attorney, to wit: LITMAN and MUCHNICK
whose address is: P. O. Box 3616, Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

within 20 days after service of this summons on that defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on
Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be
entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on DECEMBER 14, 19 72

E.B. LEATHERMAN,
as Clerk of said Court

by  _____
as Deputy Clerk

zm

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

NO.

REPLICA PUBLISHING, INC., a Florida corporation, d/b/a "REPLICA",

Plaintiff,

vs.

REPUBLICA NEWS CORP., a Florida corporation, MARIETA FANDINO and FERNANDO BALIDO, Defendants.

72-2510

NOTICE OF HEARING

CLERK OF DISTRICT COURT DADE CO. FLORIDA

72 DEC 11 AM 10 45

FILED FOR RECORD

TO: REPUBLICA NEWS CORP., 3655 S. W. 14th Street, Miami, Florida; MARIETA FANDINO, 3655 S. W. 14th Street, Miami, Florida FERNANDO BALIDO, 16 Boabodilla, Coral Gables, Florida or in the alternative 3655 S. W. 14th Street, Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's application for temporary injunctive relief as alleged in the Plaintiff's Complaint

will be brought on for hearing and will be heard by the Honorable FRANCIS J CHISTIE, one of the Judges of the above-styled Court, at 9:30 o'clock, A.M., on DECEMBER 22, 1972.

by special appointment or as soon thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing

Notice of Hearing was this 11 day of December, 1972, turned over to the Sheriff of Dade County, Florida, for service upon the above named addressee (s).

LITMAN and MUCHNICK Attorneys for Plaintiff 401 Hollywood Federal Building 5950 Washington Street Hollywood, Florida 33023 Phone: Miami 625-2713 or 625-2797

Merle Litman, [Signature]

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

Case No. 72-25104 (Christie)

REPLICA PUBLISHING, INC., *
a Florida corporation, d/b/a *
"Replica", *

Petitioner, *

vs. *

REPUBLICA NEW CORPORATION, *
A Florida corporation, and *
MARIETA FANDINO and *
FERNANDO BALIDO, *

Respondents. *

FILED - ON RECORD
72 DEC 27 AM 2:03
EXCERPT TRANSCRIPT
CLERK OF CIRCUIT COURT
DADE COUNTY FLA.

Excerpt transcript of proceedings had
and testimony taken in the above-entitled matter
before the Honorable Francis J. Christie, Circuit
Judge, Dade County Courthouse, Miami, Florida, on
Friday, December 22, 1972, commencing at 10:45 a.m.

APPEARANCES:

LITMAN AND MUCHNICK
(By MERLE LITMAN, ESQ.)
P.O. Box 3616
Hollywood, Florida 33023
For the Petitioner

STEVEN M. ROSEN, ESQ.
10 N.W. 14th Avenue
Miami, Florida
For the Respondents

- - -

* * * * *

THE COURT: It is the opinion of the Court based on and predicated upon the testimony of the case at bar that the Petitioner has, in the opinion of the Court, supplied the Court with sufficient evidence and testimony that irreparable injury is occurring and will occur, and that accordingly, based and predicated upon the testimony, the Court does hereby and herewith temporarily enjoins the publishing of this periodical or newspaper under the style of Republica.

It should be clearly understood by this temporary injunction that the Court would not consider it a violation of this temporary injunction if another name dissimilar in nature was resorted to.

The Court stands adjourned, gentlemen.

(Thereupon, the hearing was concluded.)

RECORD
73 JAN 3 AM 11 51

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

NO. 72-25104 - Judge Christie

REPLICA PUBLISHING, INC.,)
etc.,)
)
Plaintiff,)
vs.)
)
REPUBLICA NEWS CORP., etc.,)
et al.,)
Defendants.)

ORDER GRANTING PLAINTIFF'S
MOTION FOR TEMPORARY INJUNCTION

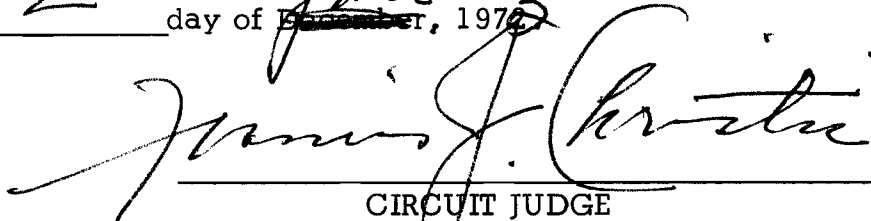
THIS CAUSE came on to be heard before me upon the Plaintiff's Complaint for Temporary Injunctive Relief against the Defendants, and the Court having duly sworn all witnesses who testified in behalf of the Plaintiff and the Defendants, the Court having further heard and considered argument of counsel and being fully advised in the premises, the Court finds as follows: That in the opinion of the Court based upon and predicated upon the testimony submitted in the case at bar, the Plaintiff has in the opinion of the Court supplied the Court with sufficient evidence and testimony that irreparable injury is occurring and will occur to the Plaintiff as a result of the conduct and actions of the Defendants herein, and that accordingly based and predicated upon the testimony presented to the Court, it is, thereupon,

ORDERED and ADJUDGED as follows:

1. That the Defendants, REPUBLICA NEWS CORP., a Florida corporation, MARIETA FANDINO and FERNANDO BALIDO, be, and they are hereby jointly and severally temporarily enjoined and restrained forthwith from in any manner or fashion continuing the publication of the periodical or weekly newspaper under the style and format and name of Republica, and that said Defendants are not to continue publication of the newspaper in question under the style, logo or name of Republica; the Court further by this Order did not and will not consider it a violation of this the Court's temporary restraining order and injunction if the Defendants wish to continue in the periodical or newspaper business so long as another name and logo is utilized by the Defendants and is dissimilar in nature to the name Replica which now is and has in the past been utilized by the Plaintiff.

2. The Defendants be, and they are hereby, ordered and directed to forth-
with in all respects comply with all of the provisions of this Order.

DONE and ORDERED in Chambers at the Dade County Court House,
Miami, Florida, this 2 day of ~~February~~ ^{Jan.} 1973

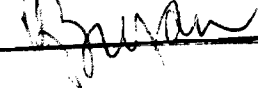

CIRCUIT JUDGE

Copies furnished:

Litman and Muchnick, Esqs.
Attorneys for Plaintiff
P. O. Box 3616
Hollywood, Florida 33023

Steven M. Rosen, Esq.
Attorney for Defendants
10 N. W. 14th Avenue
Miami, Florida

COPIES OF THE ABOVE ORDER WERE
MAILED TO ATTORNEYS OF RECORD
ON THE DATE OF ENTRY THEREOF.

BY 

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

GENERAL TRIAL DIVISION
72-25104 - Judge Francis Christie

REPLICA PUBLISHING, INC.,)
etc.,)
Plaintiff,)
vs.)
REPUBLICA NEWS CORP., etc.,)
et al.,)
Defendants.)

MOTION FOR ENTRY OF AN ORDER
ADJUDICATING DEFENDANTS IN
CONTEMPT OF COURT'S TEMPORARY
RESTRAINING ORDER

COMES NOW the Plaintiff, by and through its undersigned attorneys, and in support of the above captioned motion, alleges:

1. That this cause was heard before the Court on December 22, 1972, commencing at 10:45 A.M. on the Plaintiff's application before the Court for a temporary injunction or restraining order against the Defendants.
2. The Court at the conclusion of the presentation of all testimony by both sides in this cause rendered its opinion in the presence of all counsel for the respective parties and all of the parties and an interpreter in attendance, an excerpt of the Court's ruling and disposition of the matter as transcribed by the Court Reporter in attendance, Arthur W. Bilotti, is attached hereto and incorporated and made a part of this motion.
3. The undersigned counsel for the Plaintiff in accordance with the Court's instructions prepared an order granting the Plaintiff's motion for temporary injunction in accordance with the Court's oral ruling and announcement as set forth above and submitted same to the Court by letter dated December 26, 1972, there having intervened between the Friday, December 22nd hearing the Christmas weekend holiday, so that the earliest the Order could be submitted to the Court was on Tuesday, December 26, 1972.
4. The Defendants despite the Court's ruling on the matter on December 22, 1972, in their presence, proceeded to publish on December 28, 1972, another issue of the publication known as Republica, using the same prohibited name, style, logo and format, all of which had been enjoined from continuation by the Court by the

Court's ruling on the matter in open Court on December 22, 1972, in the presence of the Defendants and their counsel.

5. That the full english interpretation of the publication of Republica on December 28, 1972, in flagrant violation of the Court's injunctive order of December 22, 1972, will be fully submitted to the Court upon hearing on this the Plaintiff's application to hold the Defendants in contempt of the Court's temporary injunctive ruling and order.

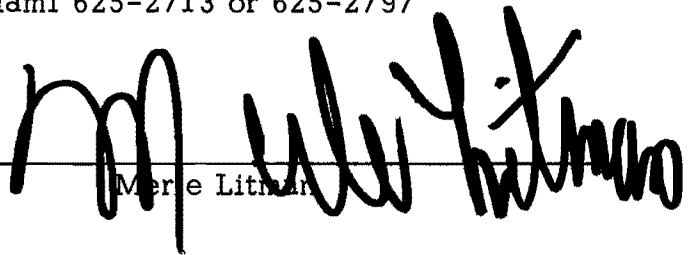
WHEREFORE, Plaintiff moves the Court to find the Defendants, jointly and severally, in contempt of the Court's injunctive order and ruling of December 22, 1972, and to impose against the Defendants any and all sanctions available under the law, including but not limited to any and all damages sustained by the Plaintiff as a result of the Defendants' publication of Republica subsequent to being enjoined from doing so by the Court's ruling in this matter.

WE HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Entry of an Order Adjudicating Defendants in Contempt of Court's Temporary Restraining Order, was mailed to Steven M. Rosen, Esq., Attorney for Defendants, 10 N. W. 14th Avenue, Miami, Florida, this 5 day of January, 1973.

LITMAN and MUCHNICK
Attorneys for Plaintiff
P. O. Box 3616
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

By _____

Merle Litman



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

Case No. 72-25104 (Christie)

REPLICA PUBLISHING, INC., *
a Florida corporation, d/b/a *
"Replica", *

Petitioner, *

vs. *

REPUBLICA NEW CORPORATION, *
A Florida corporation, and *
MARIETA FANDINO and *
FERNANDO BALIDO, *

Respondents. *

EXCERPT
TRANSCRIPT

Excerpt transcript of proceedings had
and testimony taken in the above-entitled matter
before the Honorable Francis J. Christie, Circuit
Judge, Dade County Courthouse, Miami, Florida, on
Friday, December 22, 1972, commencing at 10:45 a.m.

APPEARANCES:

LITMAN AND MUCHNICK
(By MERLE LITMAN, ESQ.)
P.O. Box 3616
Hollywood, Florida 33023
For the Petitioner

STEVEN M. ROSEN, ESQ.
10 N.W. 14th Avenue
Miami, Florida
For the Respondents

- - -

MARTIN B. LESHAW

OFFICIAL COURT REPORTERS, CIVIL COURT OF RECORD, DADE COUNTY
MIAMI, FLORIDA 33130 TEL. 373-7295

* * * * *

THE COURT: It is the opinion of the Court based on and predicated upon the testimony of the case at bar that the Petitioner has, in the opinion of the Court, supplied the Court with sufficient evidence and testimony that irreparable injury is occurring and will occur, and that accordingly, based and predicated upon the testimony, the Court does hereby and herewith temporarily enjoins the publishing of this periodical or newspaper under the style of Republica.

It should be clearly understood by this temporary injunction that the Court would not consider it a violation of this temporary injunction if another name dissimilar in nature was resorted to.

The Court stands adjourned, gentlemen.

(Thereupon, the hearing was concluded.)

CERTIFICATE

STATE OF FLORIDA)
 : SS.
COUNTY OF DADE)

I, the undersigned, hereby certify that the foregoing excerpt transcript, pages 1 and 2, is a true and correct excerpt transcript of the proceedings had and testimony taken in the foregoing cause, in re: REPLICA PUBLISHING, INC., a Florida corporation, d/b/a "Replica," Petitioner, versus REPUBLICA NEW CORPORATION, a Florida corporation, et al, Respondents, Circuit Court Case No. 72-25104, held before the Honorable Francis J. Christie, Circuit Judge, Miami, Florida, at the time and place stated in the caption thereof.

IN WITNESS WHEREOF I hereunto set my hand this 22nd day of December, 1972.


Arthur W. Billitti
Court Reporter

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

GENERAL TRIAL DIVISION
NO. 72-25104 - Judge Francis Christie

FILED
73 JAN 5 AM 10:01
RICHARD BANNER
CLERK CIRCUIT COURT
DADE CO. FLORIDA

REPLICA PUBLISHING, INC.,)
etc.,)
Plaintiff,)
vs.)
REPUBLICA NEWS CORP.,)
etc., et al.,)
Defendants.)

NOTICE OF HEARING

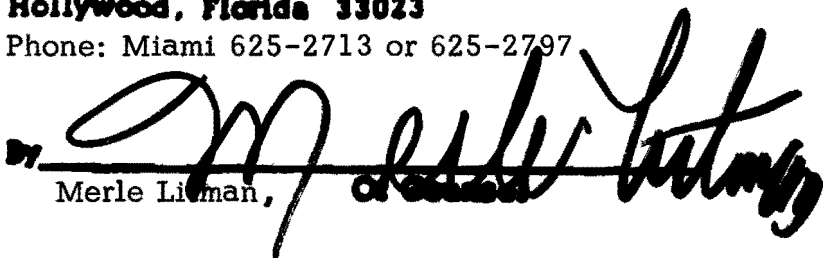
TO: STEVEN M. ROSEN, ESQ.
Attorney for Defendants
10 N. W. 14th Avenue
Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's Motion for Entry of an Order
Adjudicating Defendants in Contempt of Court's Temporary Restraining Order
will be brought on for hearing and will be heard by the Honorable FRANCIS J.
CHRISTIE, one of the Judges of the above-styled Court, at 2:30
o'clock, P.M., on JANUARY, 31 Wed, 19 73,
~~at the residence of the Defendant(s) by special appointment or as soon~~
thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing
Notice of Hearing was this 5 day of January, 19 73,
mailed to the above-named addressee (s).

LITMAN and MUCHNICK
Attorneys for Plaintiff
401 Hollywood Federal Building
5950 Washington Street
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797


Merle Litman,

FILED FOR RECORD

'73 JAN 10 AM 9 18

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

CASE NO. 72-25104

REPLICA PUBLISHING, INC.,
a Florida corporation
"REPLICA",

Plaintiff

-vs-

ALIAS
CIVIL ACTION
SUMMONS

REPUBLICA NEWS CORP., a
Florida corporation, MARIETA
FANDINO and FERNANDO BALIDO,

Defendant

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition
in this action on defendant:

FERNANDO BALIDO
SERVE AT: 610 Boabodilla Avenue
Coral Gables, Florida

)
)

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's
attorney, to wit: **LITMAN and MUCHNICK**
whose address is: P. O. Box 3616 , Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

within 20 days after service of this summons on that defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on
Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be
entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on DECEMBER DEC 19 1972, 1972

E.B. LEATHERMAN,
as Clerk of said Court

by:  _____
as Deputy Clerk

(Court Seal)

ED FOR R

JAN 15 AM 10

CLERK CIRCUIT COURT
DADE CO. FLA.

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

GENERAL TRIAL DIVISION
NO. 72-25104 - Judge Francis Christie

REPLICA PUBLISHING, INC.,
etc.,

Plaintiff,

vs.

REPUBLICA NEWS CORP.,
etc., et al.,

Defendants.

"
"
"
"
"
"

ANSWER

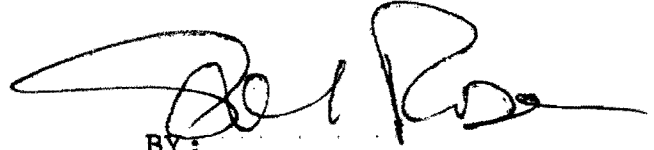
COME NOW the Defendants, by and through their undersigned attorneys, and in answer to that Complaint filed by the Plaintiff, state as follows:

1. That Defendants are without knowledge as to the allegation of paragraph 2 of Plaintiff's Complaint and would therefore require strict proof thereof.
2. That Defendants admit the allegation as stated in paragraph 3 of Plaintiff's Complaint.
3. That Defendants are without knowledge as to the allegation of paragraph 4 of Plaintiff's Complaint and would therefore require strict proof thereof.
4. That Defendants admit the allegation as stated in paragraph 5 of Plaintiff's Complaint.
5. That Defendants deny the allegations as stated in paragraphs 6, 7, 8 and 9 of Plaintiff's Complaint.
6. That Defendants deny the allegation as stated in paragraph 10 of Plaintiff's Complaint, and would state that pursuant to an Order of this Court granting temporary relief, they have changed the name and logo of their publication.
7. That Defendants deny the allegations as stated in paragraphs 11 and 12 of Plaintiff's Complaint.

WHEREFORE, Defendants request that judgment be entered in their behalf, that they once again be permitted to publish "REPUBLICA" as was the case prior to the temporary injunction issued by this Court, and further that costs be taxed against the Plaintiff.

DATED AT Miami, Dade County, Florida, this 11th day of January, 1973.

LITMAN & ROSEN
Attorneys for Defendants
10 N.W. 14th Avenue
Miami, Florida 33125
Tel: 642-4811



BY:

STEVEN M. ROSEN

I HEREBY CERTIFY THAT a true and correct copy of the foregoing Answer was mailed to LITMAN and MUCHNICK, Attorneys for Plaintiff, 401 Hollywood Federal Building, 5950 Washington Street, Hollywood, Florida 33023, this 11th day of January, 1973.



BY:

STEVEN M. ROSEN

FILED FOR RECORD

73 JAN 17 PM 11:34
IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR
DADE COUNTY, FLORIDA
RICHARD FRINKER
CLERK OF THE COURT
DADE COUNTY
No. 72-25104 - Judge Christie

REPLICA PUBLISHING, INC.,)
etc.,)
Plaintiff,)
vs.)
REPUBLICA NEWS CORP., etc.,)
et al.,)
Defendants.)

NOTICE FOR NON-JURY TRIAL

TO THE CLERK OF THE ABOVE ENTITLED COURT:

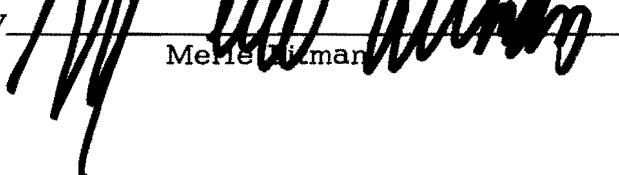
YOU WILL PLEASE TAKE NOTICE that the above styled cause is now at issue and ready for final hearing and trial, and you will please place the same on the court's next ensuing non-jury trial calendar.

It is estimated that the time required for the trial of this cause will be one-half (1/2) day.

DATED this 16th day of January, 1973.

WE HEREBY CERTIFY that a true and correct copy of the foregoing Notice for Non-Jury Trial was mailed to Litman and Rosen, Esqs., Attorneys for Defendants, 10 N. W. 14th Avenue, Miami, Florida, 33125, this 16th day of January, 1973.

LITMAN and MUCHNICK
Attorneys for Plaintiff
P. O. Box 3616
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

By 
M. Litman

'73 JAN 23 PM 3
RICHARD J. LUDWIG
CLERK CIRCUIT COURT
DADE CO. FLA.

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT OF FLORIDA IN AND
FOR DADE COUNTY CHRISTIE
NO. 72-25104

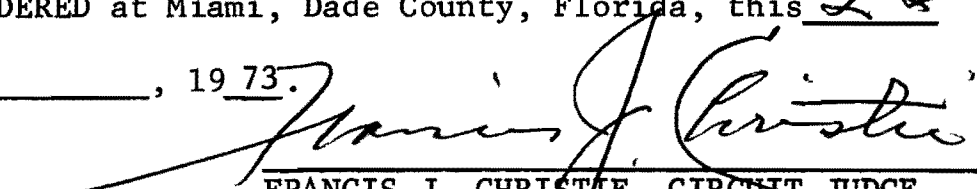
REPLICA PUBLISHING, INC., etc.,
Plaintiffs,
vs.
REPUBLICA NEWS CORP., etc.,
et al.,
Defendants.

ORDER SETTING CAUSE FOR NON-JURY TRIAL
AND
ORDER OF PRE-TRIAL INSTRUCTIONS

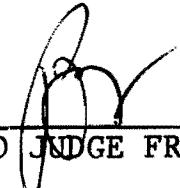
THIS CAUSE is set for final hearing before the Court and the undersigned Judge in a Courtroom or in Chambers assigned to his use in the Dade County Courthouse, Miami, Florida, for the one-week period beginning Tuesday, February 20, 1973.

And upon the Courts own Motion it is further ORDERED AND ADJUDGED as follows:

1. THAT the following shall be done at least 10 days prior to the Monday of the trial week date set forth above, except for good cause shown, or by agreement of counsel.
 - a. All discovery proceedings shall have been completed and all motions heard.
 - b. All exhibits expected to be offered at trial, except those used for impeachment, shall have been made available to opposing counsel for his examination and initialling.
 - c. Names and addresses of all witnesses, except those used for impeachment, shall have been furnished opposing counsel.
2. THAT attorneys of record for both parties are hereby required to report to the Courts Chambers for the sounding of the Non-Jury Trial Docket on Thursday, the 15 day of February, 19 73 at 1:30 p.m.

DONE AND ORDERED at Miami, Dade County, Florida, this 23 day of January, 19 73.

FRANCIS J. CHRISTIE, CIRCUIT JUDGE

IT IS HEREBY CERTIFIED that a true copy of the foregoing order was mailed on the 23 day of January, 19 73 to each of the following attorneys of record:
Litman & Muchnick, Attys for plts.
Litman & Rosen, Attys for defs.


SECRETARY TO JUDGE FRANCIS J. CHRISTIE

FILED FOR RECORD

'73 FEB 1 AM 9:56 IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT, IN AND FOR DADE COUNTY, FLORIDA

CLERK OF CIRCUIT COURT DADE CO. FLA. GENERAL JURISDICTION DIVISION NO. 72-25104 - Judge Francis Christie

REPLICA PUBLISHING, INC.,)
etc.,)
Plaintiff,)
vs.)
REPUBLICA NEWS CORP.,)
etc., et al.,)
Defendants.)

RE-NOTICE OF HEARING

TO: LITMAN and ROSEN, ESQS.
Attorneys for Defendants
10 N. W. 14th Avenue
Miami, Florida

PLEASE TAKE NOTICE that Plaintiff's Motion for Entry of an Order Adjudicating Defendants in Contempt of Court's Temporary Restraining Order will be brought on for hearing and will be heard by the Honorable FRANCIS J. CHRISTIE, one of the Judges of the above-styled Court, at 10:00 a.m. on the regular call of the Motion Calendar or as soon thereafter as counsel can be heard.

PLEASE BE GOVERNED ACCORDINGLY.

WE HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Hearing was this 31st day of January, 1973, mailed to the above-named addressee (s).

LITMAN and MUCHNICK
Attorneys for Plaintiff
401 Hollywood Federal Building
5950 Washington Street
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2797

Handwritten signature of Mel Litman

1/27/73
JAP

CLERK OF CIRCUIT COURT
DADE CO. FLA.

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

GENERAL JURISDICTION DIVISION
NO. 72-25104 - Judge Francis J. Christie

REPLICA PUBLISHING, INC.,)
etc.,)
Plaintiff,)
vs.)
REPUBLICA NEWS CORP., etc.,)
et al.,)
Defendants.)

STIPULATION FOR DISMISSAL AND
ORDER OF DISMISSAL

Filed before me this 23
day of February, 1973

STIPULATION FOR DISMISSAL

FRANCIS J. CHRIST
Circuit Court Judge

IT IS STIPULATED and AGREED by and between counsel for the respective parties that the above styled cause has been amicably settled and that the Court enter its Order dismissing the Plaintiff's Complaint herein.

DATED this 13th day of February, 1973.

LITMAN & ROSEN

10 N. W. 14th AVE.
MIAMI, FLORIDA 33125

M.D. Michael

Attorney for Defendants
10 N. W. 14th Avenue
Miami, Florida 33125
Phone: 642-4811

LITMAN and MUCHNICK
Attorneys for Plaintiff
P. O. Box 3616
Hollywood, Florida 33023
Phone: Miami 625-2713 or 625-2197

By _____

M. Litman
Merle Litman

ORDER OF DISMISSAL

THE CAUSE came on to be heard before me upon the foregoing Stipulation, upon consideration, it is, thereupon,

ORDERED and ADJUDGED that the Plaintiff's Complaint be, and the same is, hereby dismissed without prejudice.

DONE and ORDERED in Chambers at the Dade County Court House, Miami, Florida, this 23 day of February, 1973.

Francis J. Christie
CIRCUIT JUDGE

Copies furnished above named counsel

COPIES OF THE ABOVE ORDER WERE
MAILED TO ATTORNEYS RE RECORD

J.R.

Recorded this 27 day of Feb. A.D. 1973
In Circuit Court Official Record Book and
Page noted below.

RICHARD P. BRINKER
Clerk Circuit Court

By: *J. Dublin*
Deputy Clerk

ALL CONTENTS MUST NOT BE REMOVED FROM CLERK'S OFFICE
COURT. (F.S. 28.13)

RICHARD P. BRINKER
CLERK OF CIRCUIT AND COUNTY COURTS

77- 21129-CA-01
BALIDO, FERNANDO
VS
NUNEZ, MARIA F
OTHER PETITIONS

DIVISION 38

ET AL
BK # 043
PG # 129

INDEX

AA-390-03

**GENERAL JURISDICTION
CIRCUIT COURT
DADE COUNTY**

23



77- 21129-CA-01
BALIDO, FERNANDO
VS
NUNEZ, MARIA F
OTHER PETITIONS

DIVISION 38

ET AL
BK # 043
PG # 129

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FILED FOR RECORD

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RICHARD P. BRINKER
CLERK, CIRCUIT & COUNTY COURTS
DADE COUNTY, FLORIDA

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

GENERAL JURISDICTION DIVISION

CASE NO. 77-21129 CA-01

FERNANDO BALIDO,)

Plaintiff,)

vs.)

MARIA F. NUNEZ, a/k/a)

MARIA FANDINO, and)

REPUBLICA NEWS CORPORATION,)

a Florida corporation,)

Defendants.)

COMPLAINT

*See
dep 40.50
163538*

DIVISION 38

Plaintiff, FERNANDO BALIDO, by and through his undersigned attorneys, sues defendants, MARIA F. NUNEZ, also known as MARIA FANDINO, and REPUBLICA NEWS CORPORATION, and alleges as follows:

1. The defendant, REPUBLICA NEWS CORPORATION, at all times herein material, did business as a newspaper publishing and related business in Dade County, Florida.

2. Defendant corporation was founded and formed several years ago as a closely held corporation in which plaintiff owned one-half (1/2) of the stock of said corporation and defendant MARIA NUNEZ one-half (1/2) of the stock.

3. Plaintiff and defendant MARIA NUNEZ were officers, director and managers of said newspaper publishing enterprise.

4. On or about September 6, 1973, plaintiff suffered a severe stroke, which has physically debilitated and handicapped him; from the date of the stroke affecting the plaintiff to the date of the filing of this complaint, defendant MARIA NUNEZ has been in complete control and possession of the business establishment hereinabove referred to.

5. Neither the defendant corporation nor the defendant MARIA NUNEZ have rendered or submitted any report of the business of said corporation to the plaintiff. Neither did the corporation nor the defendant MARIA NUNEZ give notice of any meetings of the said corporation from the date of the above-named disability until March 4, 1977. Neither the defendant corporation nor the defendant, MARIA NUNEZ, have paid any sums of money to the plaintiff, whether as dividends, profits or salary since the date when the said disability began.

6. Plaintiff has demanded that defendant MARIA NUNEZ submit the books and records of said defendant corporation, which are in the exclusive dominion and control of defendant MARIA NUNEZ, for examination. Defendant MARIA NUNEZ denies having corporate records.

7. Defendant MARIA NUNEZ, having exclusive control, use, enjoyment, and possession of said business establishment for the past four years, has enriched herself to the detriment of the plaintiff. Based upon the conduct of defendants, plaintiff believes that defendant MARIA NUNEZ has milked the assets of said corporation and has rendered the corporation unable to meet its obligations as they become due.

8. Plaintiff is without a remedy save in a court of equity which can grant an accounting against defendant corporation and defendant MARIA NUNEZ, as well as an injunction restraining defendants from publishing until such accounting is effected.

WHEREFORE, the plaintiff asks that this Court:

1. Enter an order restraining the defendant corporation and the defendant MARIA NUNEZ from publishing any newspaper, magazine or other news material until further order of the Court.

2. Order the defendant to submit to the plaintiff, a complete and accurate accounting of all corporate activity, from the year of 1973 to the year 1976, including but not limited to, balance sheets and profit and loss statements prepared on their behalf during those years.

3. Grant unto plaintiff an equitable lien on all income retained by the defendant corporation in the event the Court requires defendant corporation or defendant MARIA NUNEZ or both, to pay the plaintiff any sums.

4. Enter a judgment against defendants for compensatory damages, punitive damages, attorney's fees and costs.

LAW OFFICES OF:
ROBERT F. GARCIA-ESQUERRO, P.A.
Intercontinental Bank Building
3899 N.W. 7th Street, Suite 210,
Miami, Florida 33126 (642-1700)

BY


MAURICIO MAGAROLAS, ESQ.

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

GENERAL JURISDICTION DIVISION

CASE NO.: 77-21129

23

FERNANDO BALIDO,)
 Plaintiff,)
 vs.)
 MARIA F. NUNEZ, a/k/a)
 MARIA FANDINO, and)
 REPUBLICA NEWS CORP., a)
 Florida Corporation,)
 Defendants.)
 _____)

14
VOLUNATARY DISMISSAL WITH
 PREJUDICE

RICHARD P. BRINKER
 CLERK, CIRCUIT & COUNTY COURTS
 DADE COUNTY, FLORIDA

'78 MAR 20 AM 11:21

FILED IN RECORD

COMES NOW the Plaintiff, FERNANDO BALIDO, by and through his undersigned attorney and files this his Voluntary Dismissal with Prejudice in the above styled cause.

I HEREBY CERTIFY that a true and correct copy of the foregoing was hand delivered to: Frank Diaz Silveira, Esquire, Attorney for Defendants, MARIA F. NUNEZ, a/k/a MARIA FANDINO and REPUBLICA NEWS CORPORATION, this 15th day of March, 1978.

LAW OFFICES OF ROBERTO GARCIA-ESQUERRO
 Intercontinental Bank Building
 3899 N.W. 7th Street
 Miami, Florida 33126

RECORDED
 MAR 21 1978
 RICHARD P. BRINKER
 CLERK

BY: *Mauricio Magarolas*
 MAURICIO MAGAROLAS, ESQUIRE

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

GENERAL JURISDICTION DIVISION

38

CASE NO. 77-21129

FERNANDO BALIDO, :
 :
 Plaintiff, :
 :
 vs. :
 :
 MARIA F. NUNEZ, a/k/a :
 MARIA FANDINO, and REPUBLICA :
 NEWS CORPORATION, a Florida :
 corporation, :
 :
 Defendants. :
 :

MOTION TO DISMISS

8

77 OCT -3 11 25

FILED IN COURT

COME NOW, Defendants, MARIA F. NUNEZ, a/k/a MARIA FANDINO and REPUBLICA NEWS CORPORATION, a Florida corporation, by and through their undersigned attorney, and file this their Motion to Dismiss, and allege as follows:

1. That as to MARIA F. NUNEZ, a/k/a MARIA FANDINO, service of process was insufficient in that it was not served personally to the Defendant, nor was substitute service performed.
2. That as to REPUBLICA NEWS CORPORATION, service of process was insufficient in that it was not served on any agent authorized by appointment or by statute to receive service of process.

WHEREFORE, Defendants, MARIA F. NUNEZ, a/k/a MARIA FANDINO and REPUBLICA NEWS CORPORATION pray that the complaint be dismissed.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to Mauricio Magarolas, Esquire, Intercontinental Bank Building, 3899 N.W. 7th Street, Suite 210, Miami, Florida, this 28th day of September, 1977.



FRANK DIAZ SILVEIRA
2650 S.W. 27th Avenue
Suite 3A6
Miami, Florida 33133
(305) 444-8319

38

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

CASE NO. 77-21129

FERNANDO BALIDO,

GENERAL JURISDICTION DIVISION

Plaintiff

CIVIL ACTION
SUMMONS

77 SEP 13 PM 05
CLERK OF COURT

-vs-

MARIA F. NUNEZ, a/k/a
MARIA FANDINO, and
REPUBLICA NEWS CORPORATION
a Florida corporation,

Defendant

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition
in this action on defendant:

PLEASE SERVE:
MARIA F. NUNEZ, a/k/a
MARIA FANDINO and
REPUBLICA NEWS CORPORATION

at

Law Offices of Frank Diaz Silveira
Attorney of Records of Maria F. Nunez a/k/a
Maria Fandino,
2650 S.W. 27th Avenue, Suite 3A6
Miami, Florida 33133

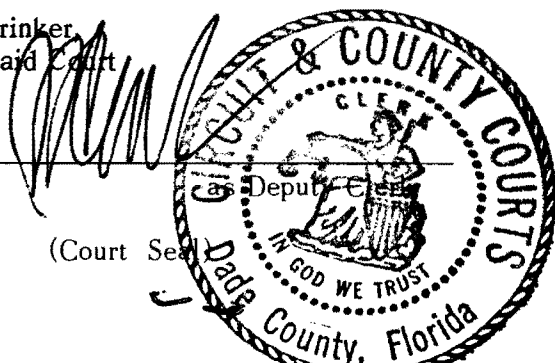
Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's
attorney, to wit: **Mauricio Magarolas, Esq.**
whose address is: **Intercontinental Bank Building, 3899 N.W. 7th Street, Suite 210,**
Miami, Florida 33126 (642-1700)

within 20 days after service of this summons on that defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on
Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be
entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on SEP 7 1977, 19

Richard P. Brinker,
as Clerk of said Court

by: _____



(Court Seal)

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA. IN AND FOR DADE COUNTY

CASE NO. ~~77-21129~~

38

FERNANDO BALIDO,

GENERAL JURISDICTION DIVISION

Plaintiff

-vs-
MARIA F. NUNEZ, a/k/a
MARIA FANDINO, and
REPUBLICA NEWS CORPORATION,
a Florida Corporation,

CIVIL ACTION
SUMMONS

CLERK
DADE COUNTY, FLA.

77 JUL 22 10:35
RECORDED

Defendant

THE STATE OF FLORIDA:

To All and Singular the Sheriffs of the State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition
in this action on defendant:

PLEASE SERVE:

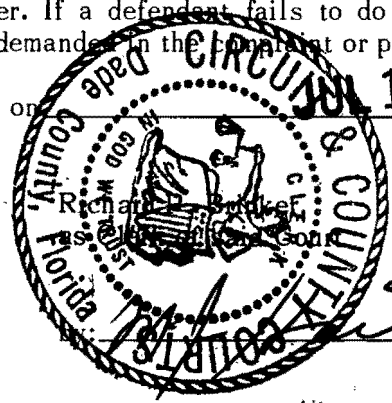
MARIA F. NUNEZ, a/k/a
MARIA FANDINO,

3655 S.W. 14th Street,
Miami, Florida

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's
attorney, to wit: **Mauricio Magarolas**,
whose address is: **Intercontinental Bank Building, 3899 N.W. 7th Street, Suite 210,**
Miami, Florida 33126 (642-1700)

within 20 days after service of this summons on that defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on
Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be
entered against that defendant for the relief demanded in the complaint or petition.

WITNESS my hand and the seal of said Court on _____, 19____



19 1977

[Signature]
as Deputy Clerk

js	CASE #77-21129	Tr. #	Reg.	Empl #
Circuit	XXXXX	Nunez, Maria F. aka Maria Fandino	625/124	13
S Court	To Be Served 6A 2650 SW 27th Ave., Ste., 3A6			0 DOCK
Type of Writ	Zone Address Fernando Balido		3	7.50 MBS 7.50 STL
Court Date	Plaintiff maria F. Nunez aka et al			
Posted	Defendant		247213	
1	Docket Number 247213	Refer to this docket number when filing as alias or pluries.	625/1249/8/77	7.50 TTL
Number of Services	Mail To: Mauricio Magarolas Intercontinental Bank Bldg. 3899 NW 7th St. Ste., 210 Miami, 33125 642-1700			DOCKET #
See				
Co-Defendant				
Dep.	No Dep.		Tr. #	Date Total Rec'd.

9-7-77 Served
 No Serviced
 Returned the same, on 9-SEPT-77 at 4:05 P. M.

on NUNEZ, MARIA F. A/K/A MARIA FANDINO
 in Dade County, Florida. (NAME)

INDIVIDUAL SERVICE: By serving the within named person a copy of the writ, and a copy of the complaint, petition or initial pleading.

SUBSTITUTE SERVICE: By serving a copy of this writ, and a copy of the complaint, petition, or initial pleading at the defendant's usual place of abode, on a member of his family the age of fifteen years or older to wit: _____ and informing such person of their contents.
 (NAME AND RELATIONSHIP)

CORPORATE SERVICE: By serving a copy of this writ and a copy of plaintiff's initial pleading to _____ as _____ of defendant corporation in the absence of any superior officer as defined in the Florida Statutes.
 (PARTY SERVED) (POSITION)

POSTED RESIDENTIAL: By attaching a copy of this writ, together with a copy of the complaint or petition, to a conspicuous place on the property described within. The above named tenant could not be found and there was no person of tenant's family, fifteen years or older at _____ the usual place of abode in Dade County, Florida, upon whom service could be made.
 (ADDRESS POSTED)

WITNESS SUBPOENA: By serving a copy of this subpoena to the within named witness, explaining the contents thereof.

NO SERVICE: For the reason that after diligent search and inquiry failed to find said _____ in Dade County, Florida. NOTE: _____ (PARTY NAMED)

OTHER RETURNS:
 Holding in file per/for _____
 Placed _____ in possession.
 Did not execute per _____
 Given address Not at No Longer in Business No Assets Bankruptcy
 Paying Direct. Made Demand Fully Satisfied
 Other SERVED THE DEFENDANT BY SERVING HER ATTORNEY MR. FRANK DIAZ SILVEIRA.

E. WILSON PURDY, Sheriff
 Dade County, Florida
 By: F. Carreras D.S.
 Signature Badge No.

js	CASE #	77-21129	Tr. #	Reg.	Empl #
Circuit	County	XXXXXX	Nunez, Maria F. aka Maria Fandino	3024/452	DOCK
S	Court	To Be Served	6A 3655 SW 14th St.	3	7.50 MOS
Type of Writ	Zone	Address	Fernando Balido		7.50 STL
Court Date		Plaintiff	Maria F. Nunez aka et al	233743	
Posted		Defendant			
1	Docket Number	233743	Refer to this docket number when filing as alias or pluries.	3024/337/19/77	7.50 TTL
Number of Services	Mail To:	Mauricio Magarolas	InterContinental Bank Bldg.		DOCKET #
See		3899 NW 7th St.	Miami, 33126		
Co-Defendant					
Dep.	No Dep.	642-1700	Tr. #	Date	Total Rec'd.
7-19-77					

Received this process on Served No Serviced Returned the same, on 20-July-77 at 5:50 P. M.
 (DATE) (DATE) (TIME)

on NUNEZ, MARIA F. A/K/A MARIA FANDINO
 in Dade County, Florida. (NAME)

INDIVIDUAL SERVICE: By serving the within named person a copy of the writ, and a copy of the complaint, petition or initial pleading.

SUBSTITUTE SERVICE: By serving a copy of this writ, and a copy of the complaint, petition, or initial pleading at the defendant's usual place of abode, on a member of his family the age of fifteen years or older to wit: _____ and informing such person of their contents.
 (NAME AND RELATIONSHIP)

CORPORATE SERVICE: By serving a copy of this writ and a copy of plaintiff's initial pleading to _____ as _____ of defendant corporation in the absence of any superior officer as defined in the Florida Statutes.
 (PARTY SERVED) (POSITION)

POSTED RESIDENTIAL: By attaching a copy of this writ, together with a copy of the complaint or petition, to a
 POSTED COMMERCIAL: conspicuous place on the property described within. The above named tenant could not be found and there was no person of tenant's family, fifteen years or older at _____ the usual place of abode in Dade County, Florida, upon whom service could be made.
 (ADDRESS POSTED)

WITNESS SUBPOENA: By serving a copy of this subpoena to the within named witness, explaining the contents thereof.

NO SERVICE: For the reason that after diligent search and inquiry failed to find said NUNEZ MARIA F. in Dade County, Florida. NOTE: (PARTY NAMED) A/K/A ETC..

OTHER RETURNS:
 Holding in file per/for _____
 Placed _____ in possession.
 Did not execute per _____
 Given address Not at No Longer in Business No Assets Bankruptcy
 Paying Direct. Made Demand Fully Satisfied
 Other DEFENDANT MOVED ABOUT ONE YEAR AGO AND UNKNOWN THE NEW ADDRESS PER HILDA FANDINO, HER SISTER-IN-LAW AND TENANT AT GIVEN ADDRESS.

E. WILSON PURDY, Sheriff
 Dade County, Florida

By: F. Carreras 4152 D.S.
 Signature Badge No.

Miami, 5 de Julio del 1983

Sra. Marieta Fandiño
Directora del Periódico La Verdad
P.O. Box 350357
Riverside Sta. Miami, Fla.

Señora:

Su respuesta a mi emplazamiento público no contesta mi pregunta; ¿Quiénes son los expresos políticos que usted dice saber son narcotraficantes? Con sus consabidas malas palabras e involucramiento de otros asuntos que no vienen al caso usted no concreta sus insinuaciones calumniosas de que hay muchos exprisioneros políticos vinculados al tráfico de drogas.

Yo vuelvo a emplazarla y la reto ante el exilio cubano para que al menos una vez concrete sus insinuaciones calumniosas, ¿Cuales son los nombres de esos que deshonoran el Presidio Político Cubano y la causa de la libertad de Cuba?.

Usted ha atacado a expresos políticos que constituye una vergüenza que el Exilio y sus organos de difusión lo hayan permitido impunemente, me refero a los que conocí y puedo dar fe por ellos, como Jose Arenal, el Dr. Tomás Regalado (padre), Martinez Echenique, de la Brigada 2506, usted ha lanzado sus diatribas y calunias contra hombres como el Dr. Antonio de Varona, Presidente de la Junta Patriótica Cubana a quien los presos políticos tanto consideramos desde allá y desde aquí también lo respetamos y veneramos, a muchos otros luchadores limpios como el Dr. Gustavo Marín ese joven de Abdala que lejos de estar divirtiéndose como tantos de su edad o haciendo dinero con su profesión de Abogado luchó valientemente por la libertad de su patria, a Tomasito Regalado usted tambien lo ha difamado en mas de una ocasión, no creo que valga la pena decirle a ningun preso político cubano quien es la figura de Tomasito Regalado y así podría nombrarle muchísimos patriotas que usted ha atacado injusta e impiadosamente, sirviendo grandemente los intereses del comunismo de Castro.

No debo terminar esta carta sin antes reconocer entre todos los directores de periódicos y periodistas a los que tanto en la prensa radial, escrita y televisada envié mi carta anterior en defensa de mis hermanos ex-presos y actuales prisioneros políticos cubanos, que solo hubo dos que parecen llevar o mejor debo aclarar que fueron tres los que llevan los pantalones bien puestos, son ellos: Jay Ducassi del Diario The Miami Herald, el Sr. Jorge Julio Rojas del Periódico Los Tiempos, y por supuesto usted Marieta Fandiño, que demostró ser mas corajuda y objetiva que muchos de los que dirigen medios de prensa y difusión y que aún habiéndolos usted difamado, no hicieron lo que usted hizo: Publicar mi carta, esto debo admitirlo.

Ya podemos ver que ni Joaquin Blaya del Canal 23, ni Tomas Garcia Fusté de la WQBA, La Cubanísima, ni Armando Rodriguez, Director del Periódico Patria, ni Ramon López de la Emisora Union Radio, ni el propio Tomasito Regalado, de la R. H.C. Cadena Azul, se atrevieron a publicar mi carta y usted si lo hizo, por esto no me duelen prendas en ratificar que usted demostro llevar bien puestos los pantalones, y confirmar por desgracia lo que me gritaron los comunistas cuando abandonaba mi sufrida patria: mas o menos me decían, allá de vas a encontrar con los líderes y voceros del exilio que te harán arrepentir de los años que estuvistes preso, usted es un ejemplo vivo de esto, por eso sigo creyendo que nadie mejor para servir la causa del castrismo en Miami, sino personas que como usted consciente o por bajas pasiones difaman de nuestros valores, igual que en la Cuba de ayer, a la que destruyeron elementos similares a usted que sirvieron a Rusia a sabidas o no, para el caso es lo mismo.

Es todo por ahora, la emplazo para que brinde esa lista de ex-prisioneros políticos que usted sabe vinculados al tráfico de drogas.


Constantino Fernández Pedraza

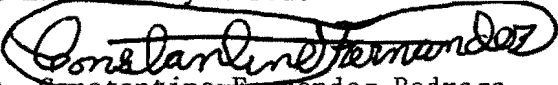
CON EL RUEGO DE SU PUBLICACION

Como la señora Marieta Fandiño no ha contestado mi emplazamiento público no me queda otra alternativa que hacerle por este medio las siguientes preguntas, que espero pueda contestar sustanciando sus respuestas con algo mas que las palabras.

- ¿ ES CIERTO O FALSO QUE USTED SE CAMBIO EL NOMBRE DE MARIA NUÑEZ, POR EL DE MARIETA FANDIÑO, PORQUE CON EL PRIMERO USTED APARECIA AFILIADA AL PARTIDO COMUNISTA CUBANO DURANTE LOS AÑOS 1956, 1957, 1958, 1959 y 1960.?
- ¿ ES CIERTO O NO QUE USTED ES HIJA DE UN REPUBLICANO ESPAÑOL QUE TAMBIEN APARECIA COMO AFILIADO AL PARTIDO COMUNISTA CUBANO DESDE 1,940 ?
- ¿ ES CIERTO O FALSO QUE SU HERMANO ES TAMBIEN MIEMBRO DEL PARTIDO COMUNISTA DE CUBA Y QUE FUE AYUDANTE DEL VICE-PRIMER MINISTRO DEL GOBIERNO CASTRISTA EN LOS PRIMEROS AÑOS POSTERIORES AL TRIUNFO DE LA REVOLUCION SANGUINARIA DEL TIRANO CASTRO?
- ¿ ES CIERTO O NO QUE USTED ES FAMILIAR ALLEGADO AL COMANDANTE DE LA REVOLUCION CASTRISTA, ANTONIO NUÑEZ JIMENEZ, UNO DE LOS JERARCAS COMUNISTAS DE CUBA?.
- ¿ ES CIERTO O FALSO QUE USTED TIENE LAS OFICINAS DE SU PERIODICO "LA VERDAD" EN EL LOCAL DE LA ORGANIZACION "FRANK PAIS" QUE USA COMO PANTALLA SU AMIGO ARTURO GONZALEZ, ALIAS "EL PAIS" CONNOTADO JEFE DE UNA RED INFORMANTES DE LA POLICIA, ENTRE CUYOS INFORMANTES MAS DESTACADOS SE ENCUENTRA USTED A QUIEN LA SACA DE APUROS ECONOMICOS CADA VEZ QUE USTED NECESITA CUBRIR LOS CONSTANTES DEFICITS PARA TIRAR SU PERIODICO AL QUE NADIE QUIERE DARLE ANUNCIOS?

Espero que por el buen nombre y para limpiar si pudiera la suciedad que rodea su actuación, usted pueda aclarar estos rumores que corren de boca en boca en todo nuestro pueblo exilado, sino lo hiciera, entonces el nombre que usted escogió para su periodico La Verdad como los comunistas escogieron el de Pravda que en Ruso significa La Verdad y que los hombres libres apodan La Mentira, como al suyo apodan EL VOMITO, y el Pueblo Nunca se Equivoca.

Usted, Maria Nuñez, Alias Marieta Fandiño, ha dividido y difamado a muchas personas decentes y destacados líderes de este exilio, patriotas sacrificados de veras, no como usted que jamas le "tiró un gollego a un chino, y que posiblemente vino para Miami en el 1960 porque la mandó el Partido Comunista a cumplir la misión que tan bien usted ha sabido desempeñar, de difamar a patriotas y algunos posibles filocomunistas, pero estos últimos para despitar precisamente, ataca 3 tontos útiles y a 100 patriotas, asi hace bueno el Lema DIVIDE Y VENCERAS, siguiente las instrucciones de La Habana y Moscu.


Firmado) Constantino Fernández Pedraza
Causa 249 de 1963, Tribunal Revolucionario del Distrito de La Habana, seguida por delito Contra la Integridad y Estabilidad de la Nación y Contra los Poderes del Estado.

CON EL RUEGO DE SU PUBLICACION

En el periódico LA VERDAD del 17 de Junio del presente año, en un párrafo de la página 5, Marieta Fandiño dice textualmente: ¿QUIEN NO SABE QUE ALGUNOS EXPRESOS POLITICOS SON CHIVAS, MERCENARIOS, DIVISIONISTAS y PEOR AUN ESTAN MEZCLADOS EN LA DROGA.

Si la señora Fandiño sabe de estos exprisioneros políticos cubanos que trafican con las drogas como se deduce de sus declaraciones y no lo ha informado a las autoridades es cómplice por encubrimiento y se confirma ademas una versión circulante hace mucho tiempo en la cual se le sitúa a usted señora Fandiño como agente Castrista para fomentar el divisionismo y desprestigiar al exilio y a verdaderos patriotas cubanos.

Lo único que podría salvara de esa acusación ya bastante generalizada entre la mayoría de nuestro pueblo exilado, de que usted Marieta Fandiño no es mas que una agente infiltrada del Castrocomunismo como agitadora para sembrar la discordia y el desprestigio entre nuestra comunidad exilada, le repito lo único que puede reivindicar su nombre des prestigiado por tanta difamación a personas decentes, sería que usted publicara la relación de ex-prisioneros políticos que segun usted afirmo en dicha edicion del 17 de Junio trafican con drogas.

Yo la emplazo publicamente a usted Marieta Fandiño, ante nuestro exilio, en memoria de nuestros fusilados y hermanos presos políticos aludidos en su libelo, y no hablo de ética profesional periodistica, pero ya indagué y supe que usted no es miembro del Colegio Nacional de Periodistas de Cuba en el Exilio, ni nunca fue ni tuvo nada que ver con el periodismo en Cuba, sino que era una conductora de una ruta de guagua que ha hecho carrera en este duro exilio con la diatriba, la calumnia y el chantage.

YO LA RETO PARA QUE PUBLIQUE LA LISTA COMPLETA DE LOS EX-PRISIONEROS POLITICOS QUE USTED AFIRMA ESTAN VINCULADOS AL TRAFICO DE DROGAS, DE NO HACERLO SE CONFIRMA LO QUE YA MUCHOS SOSPECHAMOS Y ES QUE USTED ES UNA AGENTE PROVOCADORA Y DIVISIONISTA DEL CASTROCOMUNISMO INFILTRADA POR NUESTROS ENEMIGOS EN EL EXILIO CUBANO.

Mil gracias a la prensa radial y escrita por el favor que haran a nuestra hermandad del Presidio Politico Cubano y al Exilio en General al publicar y dar a conocer esta declaracion que hago en momentos tan difíciles para nuestra patria desde un suelo extraño donde todos debíamos estar mas unidos y olvidar viejas o recientes rencillas politicas o personales si es que las hubiera.


Constantino Fernandez Pedraza

Causa 249 de 1963, Tribunal Revolucionario del Distrito de la Habana, seguida por delito Contra la Integridad y Estabilidad de la Nación y Contra los Poderes del Estado.

Condenado a 20 años de prisión de los cuales cumplí 18 habiéndome liberado poco antes del Mariel por donde me enviaron con mi hija, mis padres y esposa.

Mi dirección: 7761 S.W. 31 Terrace
Miami, Fla. 33155

Miami, Florida, Agosto 9 del 1983

Sra. Gloria Gil
Editora de la Cronica
G.P.O. Box 2902
SAN JUAN, PUERTO RICO 00936

Distinguida compatriota:

Ocasionalmente llegó a mis manos un periódico suyo y me ha gustado mucho la defensa que usted hace de los presos políticos y la relacion de colaborades que tiene en ese órgano de prensa.

Como he visto que usted publica verdades contra ese "vómito" del exilio que es Marieta Fandiño, cosa que aqui muy pocos se atreven por medio al escándalo, la chusmería barata y el chantaje objeto que ella hace por medio de su libelo La Verdad, que debia con razón llamarse la mentirañ por todo ello, le repito, es que le estoy acompañando mis tres cartas dirigidas a Marieta Fandiño, el alias que usa Maria Nuñez, la infiltrada castrista y la soplona de la policia, la immoral que todos conocemos.

Gracias por la amabilidad de publicar todas o la ultima carta en esta polémica con Marieta Fandiño, ese agente divisionista del castro-comunismo en Miami.

Soy de Vd. su Afmo. y S.S.

Constantino Fernández Pedraza