

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE FOLLOWING DOMAIN NAMES:

ROJADIRECTA.ORG, and
ROJADIRECTA.COM,

Defendants *in rem*.

Civil Action No. 1:11-cv-04139-PAC

**CLAIMANT'S NOTICE OF
MOTION TO AMEND AND
CERTIFY ORDER ON MOTION TO
DISMISS FOR INTERLOCUTORY
APPEAL PURSUANT TO 28 U.S.C.
§1292(B)**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Defendant Puerto 80 Projects, S.L.U (“Puerto 80”) by its attorneys Spears & Imes LLP and Durie Tangri LLP, will move this Court at such time as the Court may direct at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 20C, New York, New York, for an order granting Puerto 80’s Motion to Amend and Certify Order on Motion to Dismiss for Interlocutory Appeal Pursuant to 28 U.S.C. §1292(b).

Respectfully submitted,

DURIE TANGRI LLP

Dated: December 27, 2011

By: /s/ Johanna Calabria
Johanna Calabria

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