

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 18-CIV-24023-TORRES

SAMUEL SCHULTZ,

Plaintiff,

v.

ROYAL CARIBBEAN CRUISES LTD., etc.,

Defendant.

---

**DEFENDANT'S OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Royal Caribbean Cruises Ltd. ("Defendant") makes the following offer to allow judgment to be taken against it in this action and in favor of Plaintiff Samuel Schultz ("Plaintiff") on the following terms:

1. Defendant shall pay to Plaintiff the gross sum of Three Hundred Thousand Dollars (U.S. \$300,000.00), exclusive of attorneys' fees and costs, less any withholdings required by law.

2. In addition to the payment to Plaintiff specified in Paragraph 1, Defendant shall pay Plaintiff's reasonable attorneys' fees and recoverable costs through the date of this Offer of Judgment, as determined by the Court in this action.

3. Defendant's Offer of Judgment is made to fully and finally resolve all claims asserted against it in this action.

4. Pursuant to Rule 68, this Offer of Judgment shall be deemed withdrawn or rejected if it is not accepted in writing by Plaintiff within 14 days after being served.

5. This Offer of Judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and shall not be construed as an admission that Defendant is liable in this

action or that the Plaintiff has suffered any damage. This Offer of Judgment, if accepted, shall not constitute an adjudication on the merits against Defendant, and shall not operate as res judicata or to collaterally estop Defendant in any lawsuit, arbitration, administrative or other proceeding or government action.

Dated: June 21, 2021

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.  
Counsel for Defendant  
Two Datan Center  
9130 South Dadeland Boulevard, Suite 1625  
Miami, Florida 33156  
(305) 374-0506  
(305) 374-0456 (fax)

s/ David M. DeMaio \_\_\_\_\_  
David M. DeMaio  
Florida Bar No. 886513  
david.demaio@ogletreedeakins.com  
Gregory R. Hawran  
Florida Bar No. 55989  
gregory.hawran@ogletreedeakins.com  
Kelly M. Peña  
Florida Bar No. 106575  
Kelly.pena@ogletreedeakins.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 21, 2021, I served this document by email on all counsel of record or *pro se* parties identified on the attached Service List.

s/ David M. DeMaio \_\_\_\_\_  
David M. DeMaio

**SERVICE LIST**

SAMUEL SCHULTZ v. ROYAL CARIBBEAN CRUISES LTD., ET AL.  
United States District Court, Southern District of Florida  
CASE NO.: 2018-CIV-24023-TORRES

Cathleen Scott, Esq.  
cscott@scottwagnerlaw.com  
Lindsey Wagner, Esq.  
lwagner@scottwagnerlaw.com  
SCOTT WAGNER & ASSOCIATES, P.A.  
250 South Central Boulevard  
Jupiter Gardens, Suite 104-A  
Jupiter, FL 33458  
Telephone: 561.653.0008  
Facsimile: 561.653.0020

Kathleen Peratis, Esq.  
KP@outtengolden.com  
OUTTEN & GOLDEN LLP  
685 Third Avenue, 25th Floor  
New York, New York 10017  
Telephone: 212.245.1000  
Facsimile: 646.509.2071

*Counsel for Plaintiff*

Method of Service: via email

47545898.1