

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

OTO ANALYTICS, LLC,

Plaintiff,

vs.

Civil No. 23-1034

BENWORTH CAPITAL PARTNERS PR LLC,
BENWORTH CAPITAL PARTNERS LLC,
BERNARDO NAVARRO and CLAUDIA
NAVARRO,

Defendants.

**MOTION SUBMITTING TRANSLATIONS
AND IN COMPLIANCE WITH LOCAL CIVIL RULE 5(C)**

TO THE HONORABLE COURT:

COMES NOW, Defendant Benworth Capital Partners PR LLC (“Benworth PR”), specially appears without submitting to the Court’s jurisdiction, through the undersigned counsel, and respectfully submits, as exhibits to this motion, certified translations of Articles 298, 299 and 300 of the Puerto Rico Civil Code, P.R. Laws Ann. tit. 31 §§ 6231, 6232 & 6233.

The official translation of *Sucesión Almazán v. López*, 20 P.R. Dec. 537 (1914), which Benworth PR had sought from the Supreme Court of Puerto Rico, has already been submitted to the record by Plaintiff at D.E. 47-3 and 49-3.

These materials were relied upon by Benworth PR in its “Motion to Dismiss or Stay Proceedings Pending the Outcome of Arbitration” (D.E. 34).

WHEREFORE, Benworth PR requests that the Court take notice of the above and deem it in compliance with Local Rule 5(c).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, today April 26, 2023.

CERTIFICATION: The undersigned certify that this document was filed on this date with the Clerk of Court using the CM/ECF system, which will serve notice on all attorneys of record.

CASELLAS ALCOVER & BURGOS PSC

PO Box 364924

San Juan, PR 00936-4924

Tel. (787) 756-1400

Fax. (787) 756-1401

rcasellas@cabprlaw.com

cloubriel@cabprlaw.com

/s/ Ricardo F. Casellas

USDC-PR Bar No. 203114

/s/ Carla S. Loubriel Carrión

USDC-PR Bar No. 227509