

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case No. \_\_\_\_\_

_____	)
MICHELLE FENDEL,	)
	)
Plaintiff,	)
	)
	)
v.	)
	)
INMARSAT PLC,	)
INMARSAT INC., and	)
ANDREW J. SUKAWATY,	)
	)
Defendants.	)
_____	)

Removed from the Circuit Court  
in and for the 11th Judicial Circuit for  
Miami-Dade County,  
No. 11-19912-A-15

**NOTICE OF REMOVAL UNDER 28 U.S.C. § 1441 (FEDERAL QUESTION  
JURISDICTION)**

Defendants Inmarsat PLC, Inmarsat Inc., and Andrew J. Sukawaty respectfully submit this Notice of Removal of this action to the United States District Court for the Southern District of Florida, Miami Division, under 28 U.S.C. §§ 1441 and 1446. Removal to this Court is appropriate under 28 U.S.C. § 1441 because the complaint is founded entirely on two federal statutes, 18 U.S.C. §§ 2339A and 2339B. Because plaintiff's claims arise under the laws of the United States, this Court has original federal question jurisdiction under 28 U.S.C. § 1331 and the case is thus removable under § 1441(a).

1. On June 27, 2011, plaintiff commenced this action by filing the complaint in the Circuit Court for the 11th Judicial Circuit in and for Miami-Dade County, Florida (General Jurisdiction Division). *Fendel v. Inmarsat PLC et al.*, No. 11-19912-A-15 (filed June 27, 2011).

2. Defendants Inmarsat PLC and Andrew J. Sukawaty each received a summons in this matter by Federal Express delivery on June 29, 2011. Inmarsat Inc. received a summons through its registered agent for service of process, CT Corporation System, on June 29, 2011. This removal is timely made within 30 days of defendants' receipt of the complaint pursuant to 18 U.S.C. § 1446(b).

3. Pursuant to 28 U.S.C. § 1446(a), Copies of the complaint, all process, pleadings and other papers served upon defendants in this action are attached as Exhibit A.

4. The attached complaint seeks declaratory and injunctive relief for alleged violations of 18 U.S.C. §§ 2339A and 2339B. *See* Complaint, Counts I and II. Specifically, plaintiff alleges "upon information and belief" that defendants provide satellite communications services to ships that supposedly will be used to "breach Israel's [maritime] blockade [on the Gaza Strip] and to support Hamas-controlled government in the Gaza Strip." Complaint, ¶¶ 10-11. Without further explication, plaintiff contends that defendants' "provision of satellite communications services to the Flotilla Ships directly enables and facilitates the Flotilla Ships' efforts to provide material support to Hamas . . . ." *Id.* ¶ 15. Plaintiff asserts that the provision of these communications services to the Flotilla ships "constitutes a violation of §§ 2339A and 2339B." *Id.* ¶¶ 21, 27. Plaintiff purports to have a private right to relief directly under 18 U.S.C. §§ 2339A and 2339B.

5. This Court has original jurisdiction over this claim under the federal question jurisdiction statute, 28 U.S.C. § 1331, which provides original federal district court jurisdiction over civil actions "arising under" the laws of the United States. Removal is thus proper under 28 U.S.C. § 1441, which provides that "any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the

defendants, to the district court of the United States for the district and division embracing the place where such action is pending.” *Id.* § 1441(a). Federal question cases are removable “without regard to the citizenship or residence of the parties.” *Id.* § 1441(b).

6. Promptly after filing this notice, defendants shall give written notice of the removal to plaintiff and shall file a copy of the notice with the clerk of the Circuit Court for the 11th Judicial Circuit in and for Miami-Dade County, as required by 28 U.S.C. § 1446(d).

Defendants thus give notice that this action is removed to this Court pursuant to 28 U.S.C. § 1441.

Dated: July 1, 2011

**TEW CARDENAS LLP**  
*Counsel for Defendants*  
1441 Brickell Avenue, 15th Floor  
Miami, Florida 33131  
Telephone: (305) 536-1112  
Facsimile: (305) 536-1116

By: 

MATIAS R. DORTA  
Florida Bar No. 770817

JS 44 (Rev. 2/08)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

**I. (a) PLAINTIFFS**  
 MICHELLE FENDEL

**(b) County of Residence of First Listed Plaintiff** \_\_\_\_\_  
 (EXCEPT IN U.S. PLAINTIFF CASES)

**(c) Attorney's (Firm Name, Address, and Telephone Number)**  
 Isaac M. Jaroslawicz, Esq.  
 1177 Kane concourse, #222  
 Bay Harbor Islands, Florida 33154

**DEFENDANTS**  
 INMARSAT, PLC, INMARSAT, INC. ANDREW J. SUKAWATY

**County of Residence of First Listed Defendant** \_\_\_\_\_  
 (IN U.S. PLAINTIFF CASES ONLY)

**NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.**

**Attorneys (If Known)**  
 Matias R. Dorta, Tew Cardenas LLP

**(d) Check County Where Action Arose:**  MIAMI-DADE  MONROE  BROWARD  PALM BEACH  MARTIN  ST. LUCIE  INDIAN RIVER  OKEECHOBEE HIGHLANDS

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Allen Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding  2 Removed from State Court  3 Re-filed- (see VI below)  4 Reinstated or Reopened  5 Transferred from another district (specify)  6 Multidistrict Litigation  7 Appeal to District Judge from Magistrate Judgment

**VI. RELATED/RE-FILED CASE(S).** (See instructions second page):

a) Re-filed Case  YES  NO      b) Related Cases  YES  NO

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

**VII. CAUSE OF ACTION** Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

Case removed under 28 USC 1441 on the basis of federal question jurisdiction. The complaint cites 18 USC 2339A and 18 USC 2339B as basis of the claims for declaratory and injunctive relief.

LENGTH OF TRIAL via 5 days estimated (for both sides to try entire case)

**VIII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint: JURY DEMAND:**  Yes  No

**ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE** SIGNATURE OF ATTORNEY OF RECORD \_\_\_\_\_ DATE July 1, 2011

**FOR OFFICE USE ONLY**

AMOUNT \_\_\_\_\_ RECEIPT # \_\_\_\_\_ IFP \_\_\_\_\_

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

GENERAL JURISDICTION DIVISION

CASE NO.: 11-19912 CA 15

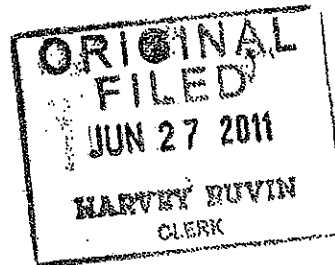
MICHELLE FENDEL,

Plaintiff,

vs.

INMARSAT PLC,  
INMARSAT INC. and  
ANDREW J. SUKAWATY,

Defendants.



COMPLAINT

Plaintiff, MICHELLE FENDEL, by and through her undersigned attorneys, sues Defendants, INMARSAT PLC, INMARSAT INC. and ANDREW J. SUKAWATY, and alleges, upon personal knowledge and, where necessary, upon information and belief, as follows:

THE PARTIES

1. Plaintiff, MICHELLE FENDEL, is a natural person, and is a United States citizen and a resident of Sderot, Israel, where her husband, Rabbi David Fendel, also a United States citizen, serves as the Dean of the Sderot Yeshiva (rabbinical academy).
2. Defendant, INMARSAT PLC, is a foreign corporation, having its principal place of business in the United Kingdom. Upon information and belief, Defendant, INMARSAT PLC, is engaged in continuous and systematic general business activities in the State of Florida, directly and/or through its agent and subsidiary Defendant INMARSAT INC.

3. Defendant, INMARSAT INC., is a Florida corporation, having an office in Miami-Dade County, State of Florida.

4. Defendant, ANDREW J. SUKAWATY ("Sukawaty"), is a natural person and, upon information and belief, is a resident of and owns real properties in Boca Grande, State of Florida. Sukawaty is also the Chief Executive Officer and Chairman of Defendant INMARSAT PLC.

#### JURISDICTION AND VENUE

5. This is an action for injunctive and declaratory relief and is therefore within the subject-matter jurisdiction of this Court.

6. Venue is proper in this Court, since Defendants INMARSAT PLC and INMARSAT INC. have an office, agents and other representatives in Miami-Dade County.

#### THE UNDERLYING FACTS

7. In 2007, the Hamas terrorist organization seized power in the Gaza Strip, and began to carry out systematic rocket and missile attacks against civilian targets in southern Israel, including, especially, civilian targets in the town of Sderot, which attacks killed and injured a large number of civilians and caused extensive property damage.

8. Hamas' rocket and missile attacks against civilian targets in Sderot continue until today, and constitute a present and on-going danger to the life, person and property of Plaintiff MICHELLE FENDEL and other residents of Sderot.

9. In order to limit Hamas' ability to receive material support enabling it to carry out such attacks, the State of Israel has imposed a maritime blockade on the Gaza Strip.

10. Following the imposition of Israel's maritime blockade on the Gaza Strip, a coalition of violent and/or militant anti-Israel organizations from the U.S. and other countries, initiated and organized efforts to breach Israel's blockade and to support the Hamas-controlled government in the Gaza Strip, by sending flotillas of ships to the Gaza Strip ("Flotilla Ships").

11. Defendants INMARSAT PLC and INMARSAT INC. (collectively: "Inmarsat") are providers of satellite communication services to ships.

12. Upon information and belief, Inmarsat provides satellite communication services to some or all of the Flotilla Ships.

13. Upon information and belief, the Flotilla Ships are legally and practically unable to sail without the satellite communication services provided to them by Inmarsat.

14. Upon information and belief, Sukawaty controls Inmarsat and controls Inmarsat's provision of satellite communications to the Flotilla Ships, and Inmarsat could not continue to provide such services without the authorization and approval of Sukawaty.

15. Inmarsat's provision of satellite communication services to the Flotilla Ships directly enables and facilitates the Flotilla Ships' efforts to provide material support to Hamas, which enhances Hamas' ability to carry out attacks against Sderot.

16. Inmarsat's provision of satellite communication services to the Flotilla Ships undermines Israel's ability to weaken Hamas' ability to carry out attacks on Sderot.

17. Inmarsat's conduct, which, upon information and belief, is authorized by Sukawaty, therefore constitutes a present and on-going danger to the life, person and property of Plaintiff MICHELLE FENDEL and other residents of Sderot.

COUNT I  
Permanent Injunction  
(against all Defendants)

18. Plaintiff repeats and re-alleges each of the foregoing allegations in paragraphs 1 through 17, and with the same force and effect as if more fully set forth herein.

19. Provision of communications services constitutes “material support or resources” within the meaning of 18 U.S.C. § 2339A.

20. Hamas is a “foreign terrorist organization” as defined in 18 U.S.C. § 2339B.

21. Therefore, the provision of satellite communications services by Inmarsat to the Flotilla Ships constitutes a violation of §§ 2339A and 2339B. *See United States v. Iqbal*, 06-CR-1054-RMB (S.D.N.Y.) (indictment and conviction for provision of satellite communication services).

22. The United States Supreme Court has determined as a matter of fact and of law that “[f]oreign organizations that engage in terrorist activity are so tainted by their criminal conduct that *any contribution to such an organization* facilitates that conduct”; that “[g]iven the purposes, organizational structure, and clandestine nature of foreign terrorist organizations, it is highly likely that any material support to these organizations will ultimately inure to the benefit of their criminal, terrorist functions”; and that it is “the considered judgment of Congress and the Executive that providing material support to a designated foreign terrorist organization – even seemingly benign support – bolsters the terrorist activities of that organization.” *Holder v. Humanitarian Law Project*, 130 S.Ct. 2705, 2724, 2727-28 (2010) (emphasis in the original).



23. Therefore, Inmarsat's provision of satellite communication services to the Flotilla Ships constitutes a present and on-going danger to the life, person and property of Plaintiff MICHELLE FENDEL and other residents of Sderot.

24. Because, as discussed above, Inmarsat's provision of satellite communication services to the Flotilla Ships is illegal and endangers the life, person and property of Plaintiff, MICHELLE FENDEL, that conduct should be permanently enjoined.

25. Because, upon information and belief, Inmarsat's conduct is controlled and authorized by Sukawaty, Sukawaty should be enjoined to prevent that conduct.

**WHEREFORE**, the Plaintiff demands a judgment against all the Defendants, granting a permanent injunction directing Defendants to immediately and permanently cease the provision of any services, including without limitation communication services, to any of Flotilla Ships, and for such other and further relief as this Court deems just and proper and as appropriate under the law, including attorney's fees to the extent permitted by law.

**COUNT II**  
**Declaratory Judgment**  
**(against all Defendants)**

26. Plaintiff repeats and re-alleges each of the foregoing allegations in paragraphs 1 through 25 with the same force and effect as if more fully set forth herein.

27. As discussed above, Inmarsat's provision of satellite communication services to the Flotilla Ships constitutes a violation of 18 U.S.C. §§ 2339A and 2339B and endangers the life, person and property of the Plaintiff.


**WHEREFORE**, Plaintiff demands judgment against Defendants INMARSAT PLC and

INMARSAT INC. declaring that their provision of satellite communication services to the Flotilla Ships constitutes a violation of 18 U.S.C. §§ 2339A and 2339B and endangers the life, person and property of the Plaintiff, and granting such other and further relief as this Court deems just and proper, including attorney's fees to the extent permitted by law.

**DEMAND FOR A JURY TRIAL**

Plaintiff demands a jury trial on all issues so triable.

June 27, 2011

  
Isaac M. Jaroslawicz, Esq. (Florida Bar Number: 979510)

E-mail address: Isaac@MyLawyerIsaac.com

**JAROSLAWICZ LAW OFFICES**

1177 Kane Concourse, #222

Bay Harbor Islands, Florida 33154

Telephone: (305) 398-7739

Facsimile: (786) 206-3575

Attorneys for Plaintiff, MICHELLE FENDEL

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

CASE NO.: 11-19912 CA 15

MICHELLE FENDEL,  
Plaintiff,

vs.

INMARSAT PLC,  
INMARSAT INC. and  
ANDREW J. SUKAWATY,

Defendants.

RECEIVED: DATE	6/29/11	TIME	
SERVED: DATE	6/29/11	TIME	10:40 AM
D#	678	PERSON SERVED	CK
CAPACITY	16		

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint in this lawsuit on defendant INMARSAT INC., by serving its Registered Agent: C T CORPORATION SYSTEM, 1200 SOUTH PINE ISLAND ROAD, PLANTATION FL 33324.

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

**JAROSLAWICZ LAW OFFICES**  
1177 Kane Concourse #222  
Bay Harbor Islands, Florida 33154  
T: 305.398.7739 F: 786.206.3575

within 20 days after service of this summons on that defendant, exclusive of the date 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.

DATE: June 27, 2011

JUN 27 2011

HARVEY RUVIN  
as Clerk of said Court

By: MICHELLE FENDEL  
Deputy Clerk

2011011320

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

CASE NO.: 11-19912 CA 15

MICHELLE FENDEL,  
Plaintiff,

vs.

INMARSAT PLC,  
INMARSAT INC. and  
ANDREW J. SUKAWATY,

Defendants.

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

~~YOU ARE~~ **COMMANDED** to serve this summons and a copy of the complaint in this lawsuit on defendant INMARSAT PLC, by serving:

its President, Andrew Sukawaty, at 99 City Road, London XxEC1 Y-1AX, United Kingdom.

or an authorized officer or director at 175 SW 7th Street, Suite 1910, Miami, FL 33130

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

**JAROSLAWICZ LAW OFFICES**  
1177 Kane Concourse #222  
Bay Harbor Islands, Florida 33154  
T: 305.398.7739 F: 786.206.3575

within 20 days after service of this summons on that defendant, exclusive of the date 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.

DATE: June 27, 2011

JUN 27 2011

HARVEY RUVIN  
as Clerk of said Court

By: BANITA DANIEL  
Deputy Clerk

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

CASE NO.: 11-19912 CA 15

MICHELLE FENDEL,  
Plaintiff,  
vs.

INMARSAT PLC,  
INMARSAT INC. and  
ANDREW J. SUKAWATY,  
  
Defendants.

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this alias summons and a copy of the complaint in this lawsuit on defendant ANDREW SUKAWATY, by serving him at:

8 Seawatch Drive, Boca Grande, FL 33921

or

5000 Gasparilla Rd. Bldg. 5041-Unit 22-B, Boca Grande, FL 33921

Or

99 City Road, London EC1Y 1AX, United Kingdom.

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

**JAROSLAWICZ LAW OFFICES**  
1177 Kane Concourse #222  
Bay Harbor Islands, Florida 33154  
T: 305.398.7739 F: 786.206.3575

within 20 days after service of this summons on that defendant, exclusive of the date 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.

DATE: June 27, 2011

HARVEY RUVIN  
as Clerk of said Court

JUN 27 2011

By: BARBARA DANIEL  
Deputy Clerk