

**BEFORE THE
FEDERAL MARITIME COMMISSION**

OJ COMMERCE, LLC,

Complainant,

DOCKET NO. 21-11

v.

HAMBURG SÜDAMERIKANISCHE
DAMPFSCHIFFFAHRTS-GESELLSCHAFT A/S & CO KG

and

HAMBURG SUD NORTH AMERICA, INC.,

Respondents.

SECOND JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE

Pursuant to 46 C.F.R. § 502.141(h) and the Presiding Officer's February 18, 2022 Order, Complainant and Respondents (collectively referred to as the "Parties"), by their respective undersigned counsel, have conferred and submit this joint status report and proposed discovery schedule.

On January 25, 2022, the Parties exchanged the initial disclosures required by 46 C.F.R. § 502.141(b). The Parties do not currently anticipate needing depositions or interrogatories more than the amounts contemplated by 46 C.F.R. §§ 502.143 (*i.e.*, no more than 20 depositions) and 502.145 (*i.e.*, no more than 50 written interrogatories), respectively.

Complainant has served its initial discovery requests, and Respondents will do so in the near future.

The Parties propose the following schedule, which begins at the top of the next page:

Event	Deadline
Disclosure of initial expert reports	June 3, 2022
Last day to serve discovery requests	June 27, 2022
Disclosure of rebuttal expert reports	July 5, 2022
Close of all discovery, fact and expert	July 29, 2022
Motions for summary disposition due	September 16, 2022

Pursuant to 46 C.F.R. § 502.64(a), the Parties conferred jointly with the Director of the Commission's Office of Consumer Affairs and Dispute Resolution Services ("CADRS") on February 17, 2022. At that conference, it was agreed the parties would attempt to resolve this matter through non-binding mediation by CADRS. That mediation has not yet been scheduled.

Respectfully submitted,

Dated: March 8, 2022

/s/Aaron W. Davis

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