

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

|                                    |   |                         |
|------------------------------------|---|-------------------------|
| OJ COMMERCE, LLC,                  | ) |                         |
|                                    | ) |                         |
| <i>Complainant,</i>                | ) |                         |
|                                    | ) |                         |
| v.                                 | ) |                         |
|                                    | ) |                         |
| HAMBURG SÜDAMERIKANISCHE           | ) |                         |
| DAMPFSCHIFFFAHRTS-GESELLSCHAFT A/S | ) |                         |
| & CO. KG                           | ) |                         |
|                                    | ) | <b>DOCKET NO. 21-11</b> |
| and                                | ) |                         |
|                                    | ) |                         |
| HAMBURG SUD NORTH AMERICA, INC.    | ) |                         |
|                                    | ) |                         |
| <i>Respondents.</i>                | ) |                         |
|                                    | ) |                         |

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to 46 C.F.R. §502.69, Respondents, Hamburg Südamerikanische Dampfschiffahrts-Gesellschaft A/S & Co. KG and Hamburg Sud North America, Inc., hereby move that the deadline for the filing of an answer be extended from the current date of January 7, 2022 to January 18, 2022. This brief extension is necessary in light of the unavailability of certain personnel during the Christmas/New Year holiday period. If granted, the modest extension should not adversely impact the schedule of this proceeding.

Pursuant to 46 C.F.R. §502.71, the undersigned has conferred with counsel for Complainant regarding this request, and has been authorized to represent that counsel for Complainant has no objections to the requested extension.

Accordingly, Respondent requests that it be granted until January 18, 2022 to file an answer in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne R. Rohde". The signature is written in a cursive style with a large initial 'W' and 'R'.

Wayne R. Rohde  
Kathryn Sobotta  
COZEN O'CONNOR  
1200 Nineteenth Street, NW  
Suite 300  
Washington, DC 20036  
(202) 463-2504

Dated: December 23, 2021

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of December, 2021, the foregoing Respondents'

Motion for Extension of Time to File Answer was served via electronic mail on:

Shlomo Y. Hecht  
[sam@hechtlawpa.com](mailto:sam@hechtlawpa.com)

and

Aaron Davis, Esq.  
[davis@valhallalegal.com](mailto:davis@valhallalegal.com)

A handwritten signature in black ink, appearing to read "Wayne R. Rohde", written in a cursive style. The signature is positioned above a horizontal line.

Wayne R. Rohde