

FOREIGN TIRE SALES INC.,

v.

EVERGREEN SHIPPING
AGENCY (AMERICA)
CORPORATION, as agent for
EVERGREEN LINE,
EVERGREEN GROUP d/b/a/
EVERGREEN LINE

REQUEST FOR EXTENSION OF TIME
TO FILE ANSWER

46 C.F.R. § 502.102

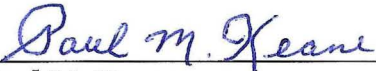
Pursuant to 46 CFR Section 502.102 Respondent Evergreen Shipping Agency (America) Corp., as agent for Evergreen Line , Evergreen Group D/B/A Evergreen Line (hereinafter “EGA” on behalf of itself and Complainant Foreign Tire Sales, Inc. requests that Respondent’s time to answer the complaint be extended up to April 30, 2022 for the reasons set out hereafter:

1. After service of the complaint, executives of Complainant and respondent have had good faith settlement negotiations and are close to entering a settlement agreement part of which will include a motion to dismiss with prejudice.
2. In order to complete settlement agreement. the parties are seeking additional time without the necessity of Respondent having to formally file an answer on April 12.
3. While Complainant’s attorney is presently overseas, he has consented to this request for extension of time. (See Attached.)

Therefore, Claimant and Respondent respectfully request an extension of time for Respondent to file an answer to the complaint to April 30, 2022.

Dated: April 5, 2022

The Law Office of Paul M. Keane
57 Summit Place, Pleasantville, NY 10570
212-344-7042 | pkeane@cckd-ny.com


Paul M. Keane

Paul Keane

Subject: FW: FTS v EVERGREEN

From: larry Inlavignelaw.com <larry@Inlavignelaw.com>
Sent: Tuesday, April 5, 2022 8:39 AM
To: Paul Keane <pkeane@cckd-ny.com>
Subject: Re: FTS v EVERGREEN

We consent

Lawrence N. Lavigne, Esq
Lawrence N. Lavigne, Esq. LLC
2444 Morris Ave., Ste 206
Union, New Jersey 07083
(908) 687-7750

From: Paul Keane <pkeane@cckd-ny.com>
Sent: Tuesday, April 5, 2022 8:34:28 AM
To: larry Inlavignelaw.com <larry@Inlavignelaw.com>
Subject: RE: FTS v EVERGREEN

Dear Mr. Lavigne

I apologize for contacting you while you are on holiday. However, Evergreen has requested that I contact you to request FTS' consent to request from the FMC an extension of Evergreen's time to reply to the complaint up to April 30 while the details of the settlement are being worked out, Please advise as soon as possible in this regard.

Best regards,
Paul

Paul M. Keane, Esq.
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From: larry Inlavignelaw.com <larry@Inlavignelaw.com>
Sent: Monday, April 4, 2022 6:11 PM
To: Paul Keane <pkeane@cckd-ny.com>
Subject: Re: FTS v EVERGREEN

Good afternoon

I am out of the country returning on 4/11

I think paragraph D is inapplicable

We can discuss the other provisions upon my return

Thank you

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