

BEFORE THE
FEDERAL MARITIME COMMISSION

Acme Freight Services Corp.,
Complainant

v.

Total Terminals International,
Respondent.

Docket No. 22-07

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING**

Pursuant to 46 C.F.R. §§ 502.69 and 502.102, Respondent, by and through their undersigned counsel, files this Motion for an Extension of Time to extend the time within which Respondent must file their responsive pleadings (pursuant to 46 C.F.R. §§ 502.62(b), 502.69, and 502.71) to the Complaint from April 15, 2022 to April 29, 2022, and in support state as follows:

1. This Motion is timely filed. Respondent's response to the Complaint is currently due April 15, 2022.
2. The reason for the request is that Respondent's counsel is currently engaged in preparation for a number of upcoming depositions and a trial for other matters, including a series of depositions from April

18th-22nd and an upcoming trial set to start April 26th. Respondent accordingly requests a two-week extension to file a responsive pleading.

3. Pursuant to 46 CFR § 502.71(a), on April 12, 2022, counsel for the parties conferred, and Complainant's counsel consented to the requested extension.

4. Based on the foregoing, Respondent respectfully requests that this Motion for Extension of Time to File Responsive Pleading be granted allowing Respondent to file a responsive pleading to the Complaint until and including April 29, 2022.

Dated: April 12, 2022

/s/ Joseph N. Akrotirianakis

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12 day of April, 2022, a true and correct copy of the foregoing Motion for Extension of Time to File Responsive Pleading was served via email on:

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