

Before the
FEDERAL MARITIME COMMISSION
Washington, D.C. 20573
Docket No. 22-08
ACHIM IMPORTING COMPANY INC. v.
YANG MING MARINE TRANSPORT CORPORATION

**SECOND JOINT MOTION FOR EXTENSION OF INITIAL
DISCOVERY RESPONSE DEADLINE PENDING SETTLEMENT**

Pursuant to 46 C.F.R. Section 502.141 and the Presiding Officer’s June 28, 2022 Order Granting Extension to Respond to Discovery in this action, Complainant Achim Importing Company Inc. (“Achim”) and Respondent Yang Ming Marine Transport Corporation (“Yang Ming”) (each a “Party” and, collectively, the “Parties”), by their respective undersigned counsel, jointly write to inform the Presiding Officer that the Parties and undersigned counsel are continuing to work diligently and collaboratively to finalize the documentation necessary to give effect to the Parties’ previously reported agreement in principle to settle this action, which they anticipate moving for leave to file confidentially for the Presiding Officer’s consideration and approval under 46 C.F.R. Section 502.72(a)(3).

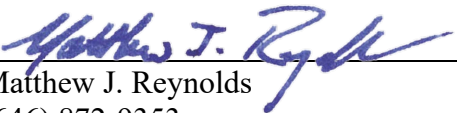
In light of these ongoing efforts by the Parties and their respective counsel, which are nearly complete and currently focused on a single remaining matter, as well as the Parties’ continued mutual desire to avoid unnecessary effort and expense in connection with this action, the Parties respectfully request that the Presiding Officer extend the current deadline for the Parties to serve objections and responses to each other’s initial written discovery requests, and permitting depositions to begin to be noticed, from July 25, 2022 to August 8, 2022. This requested extension

is particularly important because Respondent's initial written discovery requests to Complainant included numerous requests for admission, which under 46 C.F.R. Section 502.147 would be, absent stipulation of the Parties and/or order of the Presiding Officer, deemed admitted unless answered by the current July 25, 2022 deadline set by the Presiding Officer's June 28, 2022 Order. The Parties jointly stipulate to the extension requested herein under 46 C.F.R. Section 502.141(I), but for the sake of clarity and certainty also seek the Presiding Officer's approval under that section and 46 C.F.R. Section 502.147(a)(3).

The Parties currently anticipate filing joint motions for confidential treatment and approval of their pending settlement on or before August 8, 2022.

Dated : July 19, 2022

HUTH REYNOLDS LLP

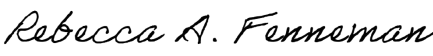

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on the 19th day of July, 2022, a true and correct copy of the foregoing document was served by email on all counsel of record in accordance with 46 CFR Part 502 and the Commission's Order of May 12, 2020 as follows:

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