

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

JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE

Pursuant to 46 C.F.R. Section 502.141(h), 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, have conferred and submit this joint status report and proposed discovery schedule.

The Parties have already exchanged the initial disclosures required by 46 C.F.R. Section 502.141(b). Consistent with Paragraph 18 of the Presiding Officer’s April 4, 2022 Initial Order in this case, the Parties have conferred concerning a stipulation regarding treatment of confidential documents and information exchanged and used in this case.

The parties propose the following schedule:

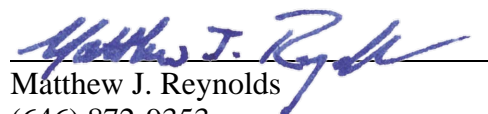
Event	Deadline
Parties may begin to discuss potential stipulations of fact	May 31, 2022
Parties may serve initial written discovery requests	June 10, 2022
Parties to serve objections and responses to initial written discovery requests and may begin to notice depositions	July 11, 2022
Complainant to serve initial expert report(s), if any	August 22, 2022
Last date to serve supplemental written discovery requests	September 16, 2022

Event	Deadline
Respondent to serve rebuttal expert report(s), if any	September 23, 2022
Parties to serve objections and responses to supplemental written discovery requests served by September 16, 2022; close of discovery	October 6, 2022
Parties' opening briefs due	December 6, 2022
Parties' reply briefs due	January 10, 2023

Pursuant to 46 C.F.R. Section 502.64(a), the Parties have respectively conferred with the Director of the Commission's Office of Consumer Affairs and Dispute Resolution Services concerning whether the matter may be resolved through mediation. Counsel for the Parties are continuing with direct communications concerning the possibility of settlement, and therefore are not scheduling a mediation at this time.

Dated: May 31, 2022

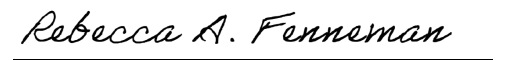
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on the 31st day of May, 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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