

**Before the**  
**FEDERAL MARITIME COMMISSION**

-----  
**Docket No. 22-14**  
-----

**MSRF, Inc.**  
**v.**  
**HMM Company, Ltd. and Yang Ming Marine Transport Corporation**  
-----

**RESPONDENT YANG MING MARINE TRANSPORT CORPORATION  
UNOPPOSED MOTION FOR CONFIDENTIAL TREATMENT OF PORTIONS  
OF ORIGINAL VERIFIED ANSWER AND EXHIBITS**

Respondent Yang Ming Marine Transport Corporation (“Yang Ming”) moves pursuant to 46 C.F.R. §§ 502.5(b) and 502.69 for the confidential treatment of the non-public version of Respondent’s Original Verified Answer (“Answer”) and Exhibits submitted therewith (“Yang Ming Exhibits”).

The Exhibits to the Answer constitute a confidential contract between Complainant and Respondent Yang Ming and a compendium of certain information therein pertaining to that contract. Each contains sensitive, confidential business information, disclosure of which would cause commercial harm to Respondent Yang Ming and to Complainant. The limited portions of the Answer marked as confidential are references to the contents of the confidential Yang Ming Exhibits, and so warrant the same protection.

Counsel for Respondent has conferred with counsel for Complainant MSRF, Inc., and Complainant does not oppose the instant Motion.

Pursuant to Rule 502.5(b), Respondent Yang Ming has contemporaneously provided a Confidential-Restricted version designating the Yang Ming Exhibits and portions of the Answer as confidential to the Presiding Officer and a Public Version to the Office of the Secretary in which the confidential information has not been included.

For the foregoing reasons, Respondent Yang Ming respectfully requests that the portions of the Answer and its exhibits identified by Yang Ming as confidential be kept confidential and not disclosed to the public.

**DATED:** July 5, 2022

Respectfully submitted,

By: /s/ Rebecca A. Fenneman

Counsel for Respondent Yang Ming Marine Transport Corporation

Eric C. Jeffrey (D.C. Bar No. 252585)

Rebecca A. Fenneman (D.C. Bar: No: 1722599)

Jeffrey/Fenneman Law + Strategy, PLLC

700 12th Street, NW Suite 700

Washington, DC 20005

Tel: (202) 904-2301

**CERTIFICATE OF SERVICE**

I certify that on the 5<sup>th</sup> 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:

**ATTORNEYS FOR COMPLAINANT:**

CLARK HILL PLC

R. Kevin Williams  
Mark R. Ludwikowski  
Mark J. Andrews

kwilliams@clarkhill.com  
mludikowski@clarkhill.com  
mandrews@clarkhill.com

312.985.5907

130 E. Randolph Street, Suite 3900  
Chicago, IL 60601

*/s/ Rebecca A. Fenneman*

Rebecca A. Fenneman  
RFenneman@JeffreyFenneman.com  
Tel: (202) 904-2301  
Jeffrey/Fenneman Law + Strategy, PLLC  
700 12th Street, NW Suite 700  
Washington, DC 20005