

**BEFORE THE FEDERAL MARITIME COMMISSION**

**Docket No. 22-26**

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**PHILIP REINISCH CO. LLC**

**v.**

**FLEXPORT INTERNATIONAL LLC**

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**CONSENT MOTION FOR ENLARGEMENT OF TIME**

Pursuant to 46 CFR 502.69 and 501.102, Respondent, Flexport International LLC (“Respondent”), by and through their undersigned counsel, files this Consent Motion for Extension to extend the time within which Respondent must file its responsive pleadings (pursuant to 46 C.F.R. §§ 502.62(b), 502.69, and 502.71) to the Complaint until November 14, 2022, and in support state as follows:

1. Since receiving the Complaint, counsel for Respondent has engaged in good faith discussions regarding the allegations, Respondent’s review thereof, with the hope of resolving this matter without further litigation.
2. Counsel for responding has had numerous scheduling conflicts the past two week including multiple court hearings outside of Miami. In addition, lead counsel will traveling outside the country for the next 10 days.
3. As such, good cause exists for the relief sought herein.
4. The motion is submitted in utmost good faith and will not adversely impact this proceeding.
5. Pursuant to 46 C.F.R. §502.71, counsel for Respondent has conferred with counsel for Complainant regarding this request, and has been authorized to represent that counsel for

Complainant consents to the requested extension. Specifically, attorney Andrew Spector discussed this matter with counsel for complainant on October 14, 2022, with respect to the relief sought herein and confirmed via email later that day.

Accordingly, Respondent respectfully requests that it be granted until November 14, 2022 to file its response to the complaint.

Dated at Miami, Florida this 21<sup>st</sup> day of October, 2022

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Attorneys for the Respondent*

By: /s/ Robert Borak

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*Certificate of Service*

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by electronic mail a copy to each such person in sufficient time to reach such person on the date the document is due to be filed with the Commission.

Dated at Miami, Florida this 21<sup>st</sup> day of October, 2022

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Attorney for the Respondent*

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