

BEFORE THE  
FEDERAL MARITIME COMMISSION

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**DOCKET NO. 22-26**

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PHILIP REINISCH COMPANY LLC  
COMPLAINANT,

v.

FLEXPORT INTERNATIONAL LLC,  
RESPONDENT.

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**JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE**

Pursuant to 46 C.F.R. § 502.141(h) and the October 4, 2022 Honorable Judge Wirth's Initial Order ("Initial Order"), Complainant, Philip Reinisch Company LLC ("Philip Reinisch") and Respondent, Flexport International LLC ("Flexport" and collectively with Philip Reinisch, the "Parties"), by their respective undersigned counsel, have conferred and submit this Joint Status Report as set forth below.

**Initial Disclosures**

The Parties have exchanged initial disclosures.

**CADRS Mediation**

The counsel for Parties contacted the Commission's Office of Consumer Affairs and Dispute Resolution Services (CADRS). Counsel for the Parties indicated the following:

1. At this time, the Parties would like to engage in private mediation;

2. While the Parties are open to mediation with CADRS in the future, it is not necessary to schedule a mediation at this time due to the intention to conduct private mediation; and
3. The Parties will contact CADRS to request a formal mediation, if necessary.

**Discovery Schedule**

The parties discussed and agreed on the following discovery schedule.

Event	Deadline
The Parties will select a private mediator and schedule mediation.	January 4, 2023
The Parties will have completed private mediation.	January 24, 2023
If mediation is unsuccessful:	
The Parties will exchange initial written discovery requests.	January 12, 2023
The Parties will submit their objections and responses to the initial discovery requests and, if applicable, privilege logs.	February 13, 2023
The Parties may begin depositions of fact and expert witnesses.	February 13, 2023
The Parties will submit initial expert reports.	March 15, 2023
The Parties will submit rebuttal expert reports.	April 14, 2023
Last day for submission of written discovery.	March 3, 2023
The Parties will complete all fact and expert depositions.	April 12, 2023
Close of discovery.	April 13, 2023
The Parties will file disposition motions.	May 19, 2023
Responses to disposition motions.	June 9, 2023
Replies to disposition motions.	June 23, 2023

Respectfully submitted,

/s/ Robert M. Borak\*

\*Permission granted on 12/13/2022

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