

**BEFORE THE
FEDERAL MARITIME COMMISSION**

Globerunners, Incorporated

Complainant,

v.

Docket No. 22-27

Hoyer Global (USA), Inc.

Respondent.

**JOINT MOTION FOR
ENLARGEMENT OF TIME TO FILE BRIEF**

Pursuant to Rules 502.215, 502.102, and 502.69 of the Commission’s Rules of Practice and Procedure (46 C.F.R. §§ 502.215, 502.102, 502.69 and 502.71) Complainant Globerunners, Incorporated (“Globerunners”) and Respondent Hoyer Global (USA), Inc. (“Hoyer”) jointly move the Federal Maritime Commission to enlarge the time for Globerunners to file its opening brief by 30 days. Globerunners and Hoyer have good cause for an enlargement because the parties are very close to settling this matter and have only recently come to this agreement.

Rule 502.102 permits the extension of time to file documents “upon a showing of good cause.” The parties have good cause because of the pending settlement. The parties have been negotiating a settlement since April 26, 2023 and have lately agreed to a serious discussion to settle, although the final agreement to do that was not until May 5, 2023, when Hoyer agreed to the enlargement of time. (See attached Exhibit A.) Additionally, although this motion is filed within the seven days of the filing deadline, the parties are in agreement.

May 7, 2023

Respectfully Submitted:



Carlos Rodriguez
Julia B. Banegas
Husch Blackwell LLP
1801 Pennsylvania Ave., N.W. Suite 1000
Washington D.C. 20006
Phone no. 202-378-2365
E-mail:
carlos.rodriguez@huschblackwell.com
julia.banegas@huschblackwell.com

Counsel for Complainant, Globerunners
Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May 2023, a true and current copy of the foregoing Motion was filed via electronic mail with the Federal Maritime Commission, and a copy was served via electronic mail on the following counsel:

John J. Sullivan

Hill Rivkins LLP
45 Broadway - Suite 2110
New York, New York 10006-3776
jsullivan@hillrivkins.com



Julia Banegas
Counsel for Complainant, Globerunners