

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 22-30

SAMSUNG ELECTRONICS AMERICA, INC.,

COMPLAINANT,

v.

ZIM INTEGRATED SHIPPING SERVICES LTD.,

RESPONDENT.

**EXPEDITED MOTION FOR ENLARGEMENT OF TIME
TO FILE EXCEPTIONS WITH NO OBJECTION FROM RESPONDENT**

Pursuant to 46 C.F.R. §502.102, Samsung Electronics America, Inc. (“Complainant” or “SEA”), by and through its undersigned counsel, hereby submits this expedited request for a forty-eight (48) hour enlargement of time for filing exceptions.

Pursuant to 46 C.F.R. § 502.228 and § 502.102, motions for enlargement of time, including those for the filing of exceptions to the Initial Decision, “may be granted upon a showing of good cause” if “received at least seven (7) days before the scheduled filing date.” Rule 102 further provides “[m]otions filed less than seven (7) days before the scheduled filing date may be considered where reasonable grounds are found for the failure to meet this requirement.” 46 C.F.R. §502.102(a). The Initial Decision in this matter was served April 22, 2025 (Doc. No. 60) and per 46 C.F.R. § 502.227, the corresponding date for filing exceptions is today, May 14, 2025.

SEA respectfully submits good cause exists to grant a limited forty-eight (48) hour extension for filing exceptions in this proceeding. This request for an enlargement of time is made because counsel for SEA lost significant work product on its computer when finalizing and

transmitting edits to complete the exceptions work for review with its client, SEA. This technical error, on the part of counsel, will require careful recreation of work product, editing, and sharing with our client for review, approval, and submission. The enlargement request is made on an expedited basis, less than 24 hours before the deadline for filing exceptions, because the error occurred today.

Meet and Confer Certification

This afternoon, on May 14, 2025, counsel for SEA contacted counsel for Respondent ZIM Integrated Services LTD (“Respondent” or “ZIM”), to explain the circumstances for the extension request. Zim’s counsel in writing does not oppose: “ZIM will not oppose SEA’s request for a 48-hour extension of time in which to file SEA’s exceptions to the initial decision in Docket No. 22-30.”

For the foregoing reasons, SEA respectfully requests a forty-eight (48) hour extension for filing exceptions, with any exceptions to the Initial Decision for both Complainant and Respondent now due on or before May 16, 2025.

Dated: May 14, 2025

Respectfully Submitted,

HOLLAND & KNIGHT LLP

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*Counsel to Samsung Electronics America,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the execution date which appears below, the undersigned served the attached document on counsel at the following email addresses:

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Executed: May 14, 2025

/s/ Carrol P. Hand
Carrol P. Hand