

**BEFORE THE FEDERAL MARITIME COMMISSION**

SAMSUNG ELECTRONICS AMERICA, INC.	)	
	)	
Complainant,	)	
	)	
v.	)	FMC Docket No. 22-30
	)	
ZIM INTEGRATED SHIPPING SERVICES LTD.	)	
	)	
Respondent.	)	
	)	

**JOINT MOTION TO EXTEND EXPERT DISCOVERY FOR LIMITED EXCEPTION  
OF RESCHEDULING EXPERT DEPOSITION OF LEE A. CLAIR**

Complainant, Samsung Electronics America, Inc. (“SEA”) and Respondent, Zim Integrated Shipping Services Ltd. (“Zim”) (each a “Party” and collectively the “Parties”), request to extend the expert discovery deadline for the limited exception of rescheduling the deposition of Zim’s expert, Lee A. Clair, to August 2, 2023 (the “Clair Deposition”). The Parties, by their respective undersigned counsel, have conferred and endeavored to schedule all depositions before the July 28 deadline, but due to a scheduling conflict, August 2 is the first date that works for both Parties for the Clair deposition. The Parties will have completed all other expert depositions by the July 28 deadline, and respectfully request one narrow exception for the Clair Deposition.

Dated: July 25, 2023

Respectfully Submitted,

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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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