

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 22-30

SAMSUNG ELECTRONICS

AMERICA, INC.,

COMPLAINANT,

v.

ZIM INTEGRATED SHIPPING SERVICES LTD.,

RESPONDENT.

**JOINT STATUS REPORT AND
PROPOSED DISCOVERY SCHEDULE**

Pursuant to 46 C.F.R. §502.141(h) and Chief Administrative Law Judge Wirth’s October 27, 2022 Initial Order, Complainant, Samsung Electronics America, Inc. (“SEA”) and Respondent, Zim Integrated Shipping Services Ltd. (“Zim”) (collectively the “Parties”), by their respective undersigned counsel, have conferred and submit this joint status report and proposed discovery schedule.

Initial Disclosures. The Parties have made their Initial Disclosures.

CADRS. The Parties have been engaged in settlement discussions and believe that any future settlement discussions can occur directly among counsel. While the Parties are open to mediation with the Commission’s Office of Consumer Affairs and Dispute Resolution Services

(CADRS) in the future, it is not necessary to schedule a mediation at this time. The Parties will contact CADRS to request a formal mediation, if necessary.

Discovery Schedule. The Parties submit the following proposed discovery schedule.

| Event | Deadline |
|---|-------------------------------|
| Service of Requests for Production and Fact Interrogatories | January 20, 2023 |
| Complete Document Production | March 20, 2023 |
| Complete Fact Depositions | April 21, 2023 |
| Expert Discovery Phase and Cut-off | April 22, 2023 - May 18, 2023 |
| Completion of All Discovery | May 18, 2023 |

Dated: January 9, 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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Executed: January 9, 2023

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