

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. 22-30

SAMSUNG ELECTRONICS AMERICA, INC.

COMPLAINANT,

v.

ZIM INTEGRATED SHIPPING SERVICES LTD.

RESPONDENT

RESPONDENT'S MOTION OF EXTENSION OF TIME TO FILE ANSWER

Pursuant to 46 C.F.R. §502.69, Respondent ZIM Integrated Shipping Services Ltd. ("ZIM") hereby moves that the deadline for the filing of an answer be extended from the current date of November 21, 2022 to December 19, 2022.

Senior representatives of the parties met in person on Wednesday, November 16 to discuss the possibility of an amicable resolution of the matters which are the subject of the complaint in this proceeding. Both parties are of the view, based on that meeting, that there is a realistic possibility of reaching agreement on a resolution of this matter by year's end.

As the Presiding Officer is aware, the filing of an answer triggers a number of procedural deadlines that the parties would be required to expend time and resources to meet. In order to enable the parties to pursue settlement discussions without simultaneously expending resources on this litigation, Respondent requests this extension of time to file an answer. If granted the

extension (which is relatively modest in light of the upcoming Thanksgiving holiday week) should not adversely impact the schedule of this proceeding.

Pursuant to 46 C.F.R. §502.71, the undersigned has conferred with counsel for Complainant regarding this request, and has been authorized to represent that counsel for Complainant has no objections to the requested extension.

Accordingly, Respondent requests that it be granted until December 19, 2022 to file an answer in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne R. Rohde". The signature is written in a cursive, flowing style.

Wayne R. Rohde
Christopher Raleigh
Kathryn Sobotta
COZEN O'CONNOR
1200 Nineteenth Street, NW
Suite 300
Washington, DC 20036
(202) 463-2507

Dated: November 18, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th Day of November, 2022, the foregoing Motion for Extension of Time to File was served via electronic mail on:

Christopher R. Nolan, Esq. (chris.nolan@hklaw.com)

Gerald A. Morrissey III (gerald.morrissey@hklaw.com)

Alison N. Skopec (allison.skopec@hklaw.com)

A handwritten signature in black ink, appearing to read "Wayne R. Rohde", is written above a horizontal line.

Wayne R. Rohde