

BEFORE THE  
FEDERAL MARITIME COMMISSION

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DOCKET NO. 22-35

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M.E. DEY & CO., INC.,  
*Complainant,*

v.

HAPAG-LLOYD AG and HAPAG-LLOYD (AMERICA) LLC,  
*Respondents.*

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**JOINT STATUS REPORT**

Pursuant to the Administrative Law Judge's Initial Order dated January 4, 2023 (FMC Dkt. # 4) Complainant M.E. DEY & CO., INC. ("M.E. DEY" or "Complainant") and Respondents HAPAG-LLOYD AG and HAPAG-LLOYD (AMERICA) LLC, as agent for Hapag-Lloyd AG ("Hapag-Lloyd" or "Respondents") (jointly the "Parties") hereby submit their joint status report.

***Consumer Affairs and Dispute Resolution Services***

The parties met with the Commission's Office of Consumer Affairs and Dispute Resolution Services (CADRS) on April 10, 2023. The parties were of the view that mediation is not likely to be productive at this time. However, the parties were open to the possibility of mediation at a later date, and indicated they would contact CADRS at a later date if it appears that CADRS could be of assistance.

***Initial Disclosures***

The parties exchanged initial disclosures on April 3, 2023.

***Proposed Scheduling Order***

The Parties propose the following Scheduling Order:

- May 3, 2023 – Initial Discovery Requests Due
- June 2, 2023 – Responses to Initial Discovery Requests Due
- June 13, 2023 – Depositions Begin
- July 21, 2023 – Deadline for Submission of Discovery Requests
- July 25, 2023 – Joint Status Report
- July 28, 2023 – Parties Complete Depositions
- August 24, 2023 – Close of Discovery
- September 25, 2023 – Complainant’s Brief, Proposed Findings of Fact, and Appendix
- October 25, 2023 – Respondent’s Opposition Brief, Responses to Proposed Findings of Fact, Proposed Findings of Fact and Appendix
- November 8, 2023 – Complainant’s Reply Brief and Responses to Proposed Findings of Fact

Respectfully submitted,

/s/ Brendan Collins

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*Attorneys for Complainant*

Dated: April 13, 2023

/s/ Wayne Rohde

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*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of April 2023, the foregoing Joint Status Report was served via electronic mail on:

Federal Maritime Commission  
Office of the Secretary  
secretary@fmc.gov

Federal Maritime Commission  
Presiding Administrative Law Judge  
judges@fmc.gov

/s/ Brendan Collins